



As a wholly owned subsidiary of Hisamitsu, Noven adheres to the same Human Rights Policy set forth by our Parent Company. Noven is committed to the complete compliance of all laws and regulations applicable to the following guidelines.

Together, Noven and Hisamitsu aim to promote “TE-A-TE Culture” worldwide, which translates to placing your hand upon the injury of a loved one to mend, while wishing for a well and swift recovery. “TE-A-TE” is the practice of compassion to others. Ever since its inception, Hisamitsu has emphasized it as the fundamental value of a “topical patch,” a form of compassionate treatment.

Hisamitsu Pharmaceutical Co., Inc. Human Rights Policy

1. Introduction

The corporate philosophy of Hisamitsu Pharmaceutical Co., Inc. (“Hisamitsu”) is “Delivering a Better QOL to the World.” Furthermore, to adapt to dynamic changes and meet diversifying customer needs, Hisamitsu has updated our company mission to “Promoting ‘TE A TE’ Culture Worldwide,” and will actively expand its business activities from its established foundation in transdermal patch technology. Respecting the human rights of people associated with Hisamitsu's business activities is consistent with our management philosophy and is an important endeavor of Hisamitsu. Hisamitsu is fully committed to contributing to the development of a sustainable society by continuously conducting management and business activities based on respect for human rights.

- **Scope of Application**

The policy applies to officers and employees of Hisamitsu. Hisamitsu will also seek alignment from all business partners involved in our business to comply with this policy.

2. Core Concept for Human Rights

Hisamitsu formulated this policy based on “Guiding Principles on Business and Human Rights”; and the respect of human rights declared in the “International Bill of Human Rights” (“Universal Declaration of Human Rights,” “International Covenant on Civil and Political Rights,” and “International Covenant on Economic, Social and Cultural Rights”) of United Nations; core labor standards of the “ILO Declaration on Fundamental Principles and Rights at Work” of the International Labor Organization (ILO); and the “Declaration of Helsinki” of the World Medical Association (hereinafter referred as “international human principles”). These human rights must be protected and respected by employees, business partners, and all people involved with Hisamitsu products or services. To this end, Hisamitsu will avoid causing or perpetuating negative impact on human rights and will address forthright any situation of such impact arising. Hisamitsu will also endeavor to prevent or reduce negative impact on human rights that are directly connected to business, products, and services of Hisamitsu through business transactions. This policy complements the description of “Hisamitsu Pharmaceutical Corporate Charter” and incorporates the concept of respecting



human rights into our business activities. We will provide appropriate education and training to our employees to ensure this policy is understood and implemented effectively.

3. Execution of Responsibility to Respect Human Rights

- **Implementation of Human Rights Due Diligence**
To fulfill our responsibility to respect human rights, Hisamitsu will continue to conduct human rights due diligence, targeting negative impacts on human rights associated with our business activities.
- **Dialogue and Consultation with Stakeholders**
Hisamitsu will make use of external knowledge experts on human rights to conduct meaningful dialogues and discussions with stakeholders.
- **System/Responsible Person**
Hisamitsu will take appropriate measures based on the results of the assessment of the negative impact on human rights by establishing a system necessary for implementing this policy and clarifying the person(s) responsible.
- **Correction**
If it becomes clear that Hisamitsu has caused or promoted a negative impact on human rights, we will work to correct this through appropriate measures.
- **Disclosure of Information**
Hisamitsu will monitor the implementation of corrective actions and disclose progress of these measures regularly.
- **Applicable Law**
Hisamitsu complies with laws and regulations applicable to the countries and regions of operations. However, if the laws and regulations of each country and region conflict with the principles of international human rights, Hisamitsu will pursue methods to respect the principles of international human rights to the greatest extent possible.

NAKATOMI Kazuhide
President & CEO
Hisamitsu Pharmaceutical Co., Inc.
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