

Fair Opportunities Policy



Fair Opportunities Policy of **PENTAX** Medical

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PREAMBLE

At PENTAX Medical, we believe that fair opportunities are the foundation of a high-performing, inclusive, and human-centered workplace. As a medical technology company with a global footprint, we recognize that diversity strengthens our ability to serve patients, innovate responsibly, and contribute to health and well-being globally.

This Policy reflects our commitment to providing every employee — regardless of gender, origin, religion, disability, age, sexual orientation, or background — with equal access to opportunities for growth, contribution, and belonging. It is aligned with our **ESG Goal 10: Ensure fair opportunities for all employees, and our broader values as part of the HOYA Group.**

Fairness is not a static condition. It is a long-term journey of continuous awareness, intentional action, and cultural evolution. We believe that inclusion is everyone's responsibility — and that the best results emerge when all individuals are empowered to contribute as their full selves.

Stephanie Rossow
Chief Human Resources Officer

PART I: Purpose and Scope

This Policy applies to all employees of PENTAX Medical, across all functions and geographic regions. It defines our commitments to fairness, equal opportunity, inclusion, and respect for diversity in every aspect of the employee experience — from recruitment and career progression to compensation, wellbeing, and leadership.

We recognize the uniqueness of each region's legal, social, and cultural framework. Our policies are designed to provide a consistent foundation while enabling local adaptation where appropriate. Our commitment is to ensure that no employee is disadvantaged because of who they are, and that everyone has a chance to thrive.

PART II: Guiding Principles

Be you! We strongly believe that companies that are diverse in age, gender, gender identity, race, sexual orientation, physical or mental ability, ethnicity, national origin, religion and perspective are better companies. More importantly, creating an environment where everyone, from any background, can do their best work is the right thing to do. Everyone is welcome—as an inclusive workplace, our employees shall feel comfortable bringing their authentic whole selves to work.

Our approach is guided by the following five principles:

1. **Equal Access:** Fair and open access to opportunities, roles, and responsibilities.
2. **Respect and Dignity:** Zero tolerance for harassment, discrimination, or exclusionary behavior.
3. **Representation and Inclusion:** Recognizing and valuing different voices, backgrounds, and experiences.
4. **Transparency and Accountability:** Clear expectations, measurable goals, and open dialogue.
5. **Global Commitment with Local Sensitivity:** Unified standards with cultural awareness.

PART III: Our Commitments in Practice

We translate our principles into concrete actions through:

Gender Representation: We aim to achieve balanced gender representation, especially in management roles. While PENTAX Medical does not impose rigid quotas, we actively support efforts to improve representation. This includes our support of HOYA Group's 'Minkatsu' Diversity Project in Japan, which has set a target of 18% female leaders by 2026.

Equal Parental Leave: We are committed to enabling all male employees to take parental leave by 2026, subject to local laws and norms. We recognize caregiving as a shared responsibility.

Inclusion of Persons with Disabilities: We ensure reasonable workplace adjustments and inclusive work design to support individuals with physical or psychological disabilities.

Training and Awareness: Anti-harassment education is mandatory for all employees. In FY2023/24, 100% of employees completed an anti-harassment training.

Equal Pay and Transparency: We regularly assess pay structures to address unjustified pay gaps and ensure fair remuneration practices across roles and regions.

Ethical Labor Standards: We strictly prohibit child labor, forced labor, and human trafficking. Our recruitment procedures include age verification, and we ensure that young workers are provided with safe working conditions.

Protection of Minorities and Vulnerable Groups: We are committed to creating a workplace that reflects the diversity of society. We support initiatives that improve representation of underrepresented groups in hiring and leadership, consistent with local legislation.

PART IV: HOYA Group Framework and Shared Direction

As part of the HOYA Group, PENTAX Medical upholds the principles outlined in the HOYA Human Rights Policy (2022), which reaffirms our responsibility to respect internationally recognized human rights throughout our operations and

supply chains.



We are further guided by the HOYA Code of Conduct, which sets expectations for ethical behavior, respect, and compliance with applicable laws. Both documents inform our practices and are available publicly:

- HOYA Human Rights Policy: https://www.hoya.com/wp-content/uploads/2022/11/HOYA_Human-Rights-Policy_2210127.pdf
- HOYA Code of Conduct: https://www.hoya.com/wp-content/uploads/2024/08/HOYA_COC_FINAL_042822_English-1.pdf

We align our own goals with HOYA's broader sustainability vision, including the promotion of safe workplaces, employee wellbeing, social inclusion, and ethical leadership. As we grow together, we remain committed to translating these values into everyday practice.

PART V: Roles and Responsibilities

All employees are responsible for contributing to a culture of fairness and inclusion. This includes respectful conduct, openness to others, and proactive reporting of inappropriate behavior.

Managers and leaders are expected to:

- Model inclusive behavior.
- Ensure equitable hiring, evaluation, and promotion processes.
- Act immediately on any complaints or signs of unfair treatment.

HR and Compliance teams provide the policies, processes, and oversight to monitor progress, deliver training, and ensure consistency across the organization.

PART VI: Zero Tolerance for Harassment

At PENTAX Medical, we are committed to maintaining a respectful, safe, and inclusive workplace. Any form of harassment—whether physical, verbal, or non-verbal—is strictly prohibited and fundamentally opposed to our values. This includes harassment based on gender, origin, age, religion, sexual orientation, disability, or any other protected characteristic.

Power harassment, meaning the misuse of authority or hierarchical position to intimidate, demean, or unfairly disadvantage others, is a particularly serious violation of our standards. Leaders carry a special responsibility to use their influence respectfully and to foster a work culture based on trust and fairness.

All employees are encouraged to speak up against harassment and to support those who may be affected. PENTAX Medical provides safe and confidential channels for reporting incidents—including the HR team, designated trusted persons, and the global HOYA Helpline.

Our zero-tolerance policy is not only about protecting individuals; it's about building a culture where everyone can thrive and reach their full potential.

PART VII: Reporting Channels & Safe Environment

Employees can raise any concerns or suspected misconduct through the following confidential channels:

- Local Human Resources
- Manager or Supervisor
- Compliance Team
- HOYA Helpline: <https://secure.ethicspoint.eu/domain/media/en/gui/51981/report.html>

The Helpline is accessible 24/7, available in multiple languages, and may be used anonymously where permitted by law.

PENTAX Medical prohibits any form of retaliation against employees who report concerns in good faith. Ensuring a safe, respectful and non-discriminatory workplace is a shared responsibility.

PART VIII: Monitoring and Continuous Improvement

We track and review key indicators on a regular basis, including:

- Participation in Anti-harassment training.
- Gender and minority representation in leadership roles.
- Pay equity assessments and compensation transparency.
- Survey feedback on inclusion and respect.
- Reports of discrimination or harassment (anonymized).

Results inform internal reviews and external ESG reporting. Continuous improvement is embedded in our approach, and feedback from employees is a valued part of this process.

PART IX: FINAL PROVISION

This Fair Opportunities Policy enters into force on June 1st, 2025. It will be reviewed and, if necessary, updated on an annual basis.

The Policy serves as a corporate guideline for all employees of PENTAX Medical. In case of any conflict between this Policy and local laws or statutory requirements, the local legal provisions shall always prevail.



Stephanie Rossow
Chief Human Resources Officer