

Rigaku Responsible Mineral Procurement Policy

VER.1
AS OF NOVEMBER 1, 2023
RIGAKU HOLDINGS CORPORATION

Rigaku Responsible Mineral Procurement Policy

Rigaku Group's Policy

The Rigaku group of companies is concerned about the significant social issues related to extraction of minerals such as tin, tantalum, tungsten, gold and cobalt, which can lead to funding of conflicts and causing human-rights violations such as child labor or poor working conditions in conflict-affected countries and high-risk areas. To fulfill our social responsibility, we promote responsible mineral procurement through our whole supply chain.

To promote specific efforts about these responsible mineral procurement, we are committed to the following activities.

- Based on OECD Due Diligence Guidance^{※1}, we manage and conduct our supply chain appropriately.
- We use the survey of the industry standard RMI^{※2} (Responsible Minerals Initiative) and conduct a survey and risk assessment going back through our supply chain in cooperation with primary purchasers.
- We request you, our suppliers, to procure minerals from compliant smelters/refiners based on RMAP^{※3} (Responsible Minerals Assurance Process)
- If we identify risks, we will implement corrective measures.
- Based on Section 1502 of Dodd-Frank, as a company involved in the supply chain of the US SEC registered companies, we disclose appropriate information regarding conflict minerals and other high-risk minerals by reporting to our customers based on our assessment of the supply chain.

We ask our business partners to understand the policy of the Rigaku group of companies and request that they work to comply with this policy.

- ※1 OECD Due Diligence Guidance: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
 - OECD: Organization for Economic Co-operation and Development: international organization with membership from Europe, Japan, the USA and others.
- ※2 RMI (Responsible Material Initiative): an organization which takes initiative to work on conflict minerals.
- ※3 RMAP (Responsible Minerals Assurance Process): an assessment process promoted by the RMI

Internal organization structure for Responsible Mineral Procurement

The executive officer in charge of procurement is assigned as the overall person responsible, with dedicated members assigned to promote and work for realization of this Policy. We promote activities based on "Rigaku Responsible Mineral Procurement Policy" in cooperation with our business partners.

Responsible Mineral Procurement Survey

Rigaku group of companies conducts surveys about conflict minerals with our business partners.

We use RMI survey (CMRT: Conflict Minerals Reporting Template). We analyze risks based on the CMRT returned by our suppliers. We request further information when we judge there are risks, for example in the case that smelters/refiners are not in conformity with RMAP.

In case minerals involved in conflicts are found in supply chain, we request you to avoid using them by taking measure such as seeking an alternative supplier.

We also conduct supply chain survey using RMI survey (EMRT: Extended Minerals Reporting Template) and specifying/investigating refine/refiners about other minerals such as cobalt, which have created concerns about human rights issues including child labour.