Measures to Prevent the Recurrence of Human Rights Violations and Related Misconduct

In connection with our operation of MangaONE, our webcomic website, we first suspended and later ended publication of a manga series by an author who had previously engaged in serious sexual misconduct. Nevertheless, we later re-engaged the same author under a different pen name as the original story writer for another manga series (the **“MangaONE Case”**). Other similar cases also came to light.

In light of the MangaONE Case and these similar cases (collectively, the **“Cases”**), we concluded that an objective and impartial investigation was necessary to establish the relevant facts, identify the underlying causes, and obtain recommendations for preventing recurrence. Accordingly, on March 19, 2026, an independent Third-Party Committee chaired by attorney Toshihiko Itami was established. The Third-Party Committee began its investigation on the same day, and we received its investigation report on August 3, 2026. Among other matters, the investigation report noted that SHOGAKUKAN did not necessarily have sufficient awareness of the need to view issues from the perspective of victims of human rights violations; sufficient regard for the need to prevent the facilitation of or contribution to human rights violations; sufficient recognition of the human rights risks inherent in the power imbalances that may arise between editors and authors or other business partners; or adequate systems for making organization-wide decisions regarding material risks, including human rights risks, and for managing and overseeing such risks.

On August 3, 2026, we received the investigation report from the independent Third-Party Committee established in response to the Cases. In light of the factual findings and recommendations set out in the investigation report, we have determined how our directors, officers, and employees will be held accountable and formulated measures to prevent the recurrence of similar cases. We hereby announce the details below.

Once again, we extend our deepest apologies to all those who suffered harm. We also sincerely apologize to our readers, authors and creators, business partners, and all other stakeholders for the considerable inconvenience and distress we have caused.

The measures announced below are intended to translate the recommendations of the Third-Party Committee into specific actions. Our objective is to place respect for human rights at the core of our corporate activities and to carry out fundamental reforms covering human rights education, our corporate culture, and our management and governance structures.

We deeply regret what occurred. Everyone within our company will work together to implement these measures steadily and responsibly. We will also continue to review their effectiveness and make improvements where necessary, with the aim of transforming our organization so that similar cases never occur again.

We would once again like to express our sincere gratitude to everyone who continues to support us. Going forward, we will work to regain your trust by consistently making appropriate decisions and acting with integrity. In doing so, we will fulfill our responsibilities as a company.

SHOGAKUKAN Inc.
Nobuhiro Oga
Representative Director and President

I. Our Response to the Investigation Report

As stated in the investigation report, the Cases were extremely serious matters involving human rights. We recognize that the Cases raise serious questions about whether we gave due consideration to those who suffered harm, whether our understanding of and judgment concerning human rights were adequate, and whether our corporate governance and crisis management systems functioned effectively.

We do not regard the Cases as problems limited to a particular department or individual. Rather, we recognize the Cases as company-wide issues involving decision-making within our editorial divisions, information-sharing systems, the involvement of our corporate support departments, and the effectiveness of management oversight.

As a company that seeks to contribute to society through the works and content we publish, our business is founded on relationships of trust with our readers, authors and creators, business partners, and other stakeholders. In the Cases, however, we failed to fulfill our social responsibilities adequately.

We regard respect for human rights as one of our highest priorities. Accordingly, we will give the utmost priority to supporting those who suffered harm and providing appropriate remedies, while taking responsibility for implementing the organizational improvements and measures to prevent recurrence set out below.

II. Accountability of Directors, Officers, and Employees

We take the factual findings and recommendations in the investigation report extremely seriously. To clarify management accountability, the following directors and officers will voluntarily forgo a portion of their monthly remuneration:

- **Representative Director and President:** 50% of monthly remuneration for three months
- **Two Senior Managing Directors:** 30% of monthly remuneration for three months
- **Three Managing Directors:** 30% of monthly remuneration for three months
- **Three Managing Directors:** 20% of monthly remuneration for three months

- **Two Directors:** 30% of monthly remuneration for three months
- **Thirteen Directors:** 20% of monthly remuneration for three months
- **Two Audit & Supervisory Board Members:** 20% of monthly remuneration for three months

With respect to employee accountability, we will take strict and appropriate action in accordance with our Rules of Employment.

III. Measures to Prevent Recurrence

In light of the factual findings and recommendations in the investigation report, we will implement the following measures to prevent recurrence.

A. Basic Principles

1. We will give the highest priority to safeguarding the dignity and safety of those who suffered harm.
2. We will provide employee training that prioritizes respect for human rights and will establish a corporate culture in which human rights violations are not tolerated.
3. We will review our processes for commissioning work from external creators and other business partners and for deciding whether to continue working with them.
4. We will strengthen oversight by management and our corporate support departments, and enhance our corporate governance, risk management, and crisis management systems.
5. We will strengthen and promote the use of our internal reporting systems and introduce a grievance mechanism—a system for receiving complaints from, and providing remedies to, persons who are suffering or have suffered harm as a result of human rights violations in connection with our business activities. Through these measures, we will establish an environment in which those who are suffering or have suffered harm feel able to speak up.

B. Specific Measures to Prevent Recurrence

1. Formulation of a Human Rights Policy, Establishment of a Human Rights Committee, and Implementation of Human Rights Due Diligence

- On March 19, 2026, we adopted the SHOGAKUKAN Human Rights Policy (the **"Human Rights Policy"**). In the Human Rights Policy, we affirmed our commitment to giving due consideration to fundamental human rights, including privacy, at every stage of planning, production, and provision of content, while respecting freedom of expression.
- To advance our efforts to respect human rights in accordance with the Human Rights Policy, we will establish a Human Rights Committee that includes external experts. The Human Rights Committee will formulate policies for preventing, mitigating, and remedying human rights

violations, including sexual misconduct, as well as serious compliance violations and similar misconduct (collectively, **"Human Rights Violations and Related Misconduct"**).

- The Human Rights Committee will conduct human rights due diligence covering all aspects of our publishing activities in order to systematically identify and assess human rights risks. Based on its results, we will identify specific areas of risk relating to human rights violations within our business and promote efforts to prevent, mitigate, and remedy such violations.

2. Expansion of Human Rights Training and Reform of Our Corporate Culture

- We will regularly provide all directors, officers, and employees with training on respect for human rights, the prevention of sexual violence and harassment, how to respond appropriately to and support those who are suffering or have suffered harm, and whistleblowing and other reporting systems. We will introduce separate training programs for managers to enable them to make appropriate decisions and exercise effective supervision and guidance in accordance with their respective roles and responsibilities. We will also establish guidelines governing interactions with external stakeholders and require compliance with those guidelines.
- We will continue to conduct human rights seminars to raise awareness of respect for human rights throughout our company and establish a corporate culture in which misconduct is not overlooked.
- We will also provide external creators, including authors, original-story creators, writers, and other freelancers, with opportunities to participate in human rights seminars and similar educational programs.

3. Review of the Processes for Engaging External Creators and Other Business Partners and for Deciding Whether to Continue Working with Them

- We will continue to communicate the substance and objectives of our Human Rights Policy to external creators and other business partners and work to foster their understanding and cooperation.
- Whenever we engage an external creator or other business partner, we will ensure that the relevant contract includes an express provision requiring respect for human rights.
- With respect to any concerns that arise regarding possible Human Rights Violations or Related Misconduct involving an external creator or other business partner, we will establish clear rules requiring the employee responsible for the relationship to promptly report the matter to, and consult with, their supervisor and the relevant corporate support departments.
- To address such concerns, we will clearly define the company-wide decision-making process and lines of authority for decisions on whether to engage or continue working with the external creator or other business partner. The process will involve the Legal Office and other relevant corporate support departments, together with the relevant editorial division.

- If such concerns arise, we will treat the protection of those who are currently suffering or have suffered harm, the prevention of further harm, and our responsibilities to society as mandatory considerations in deciding whether to engage or continue working with the external creator or other business partner. In particular, where a person is being subjected to or has suffered serious human rights violations and we determine that engaging or continuing to work with the relevant external creator or business partner would be ethically unacceptable, we will not enter into or continue such an engagement.
- If such concerns arise, we will investigate the relevant facts and make an overall determination based on all the circumstances. We will first request appropriate corrective action and then decide whether to proceed with a new engagement or suspend or discontinue an existing one.

4. Strengthening of Corporate Governance and Oversight

- The Board of Directors will receive regular reports, as well as additional reports whenever necessary, concerning human rights violations, including sexual misconduct, serious compliance violations, and similar matters, and will exercise oversight at the management level.
- If the Board of Directors becomes aware of a serious Human Rights Violation or Related Misconduct, it will oversee the response to the matter, examine whether similar cases may exist in other business divisions, and direct the development of measures to prevent recurrence.
- Proposed decisions concerning Human Rights Violations or Related Misconduct will be reviewed in advance by the Risk Management Office and the Human Rights Committee. The Legal Office will assess whether the proposed decision is appropriate and proportionate, taking into account the seriousness of the matter, the protection of those who are suffering or have suffered harm, and the prevention of recurrence. Management will respect the results of that assessment.
- Depending on the seriousness and circumstances of the matter, management will establish either an Emergency Response Committee or a Special Response Committee. We will adopt separate internal rules clearly setting out the criteria for establishing each committee, the respective roles and responsibilities of the committees, and the procedures for their operation.
- To ensure the appropriate review of Human Rights Violations and Related Misconduct and effective follow-up on efforts to resolve them, we will strengthen the staffing and other resources of the Legal Office. In cases involving serious Human Rights Violations or Related Misconduct, obtaining advice from external experts will be mandatory.
- We will take strict and appropriate action against any person involved in Human Rights Violations or Related Misconduct, in accordance with our Rules of Employment and other applicable company rules.

- We will clarify the respective roles, authority, and working relationships of the Human Rights Committee, the Compliance Committee, and the Harassment Committee and establish an operating structure that enables these committees to respond appropriately to serious cases. The decisions and discussions of each committee will be recorded in meeting minutes and retained as company records. Committee members will also receive the training necessary to enhance the effectiveness of each committee.
- When decisions are made concerning Human Rights Violations or Related Misconduct, we will clearly specify the documents and information that must be prepared, the matters that must be considered and discussed, and the information that must be included in the meeting minutes. This will ensure transparency in the decision-making process and allow decisions to be reviewed at a later stage.

5. Enhancement of Our Reporting, Consultation, and Investigation Systems

- In addition to our existing reporting systems, we will introduce a grievance mechanism in accordance with the United Nations Guiding Principles on Business and Human Rights. Through this mechanism, persons affected by Human Rights Violations or Related Misconduct, as well as other stakeholders, will be able to submit complaints regardless of whether they have a direct contractual relationship with our company. The grievance mechanism will provide a path toward dialogue, corrective action, and appropriate remedy.
- To ensure objective decision-making in the operation of the grievance mechanism, we will introduce a process through which the views of external human rights experts are obtained and appropriately reflected.
- We will reorganize and improve our existing reporting channels, including those for harassment, compliance matters, and matters covered by Japan’s Freelance Act (the Act on Ensuring Proper Transactions Involving Specified Entrusted Business Operators). We will clearly set out the availability of anonymous reporting, the use of external reporting channels, and the protective measures available to persons who report that they are suffering or have suffered harm.
- For cases involving sexual misconduct, we will establish a specialized response protocol, promptly ascertain the relevant facts, and enhance support for those who are suffering or have suffered harm, including by providing psychological counseling at their request.
- As a general rule, external experts will participate in investigations of serious Human Rights Violations or Related Misconduct in order to ensure the independence and neutrality of those investigations.
- For each of our reporting and consultation systems, we will document standard response procedures and provide ongoing information to all directors, officers, employees, and key stakeholders regarding the types of matters covered, how to use the systems, and the basic

process following a report or consultation, thereby enhancing the effectiveness of these systems. We will disseminate this information through our website and other appropriate channels. We will also introduce a system for providing relevant information to business partners and other relevant parties at the outset of a business relationship.

- For matters brought to our attention through a report or consultation, we will appropriately record and manage the number of reports and consultations received, the categories of matters raised, and an overview of the status of our responses. We will establish a framework that allows this information to be used to assess the utilization and effectiveness of these systems.

The Risk Management Office, in coordination with the Human Rights Committee, will take the lead in continuously reviewing whether these measures are being implemented effectively and whether they are achieving their intended objectives. The Risk Management Office will promote the implementation of each measure, assess its effectiveness, and report progress to the Board of Directors. We will review and improve these measures as necessary.

IV. Looking Ahead

We recognize that the Cases should not be viewed as isolated incidents; rather, they constitute a serious management issue that calls into question our very approach to respect for human rights, corporate governance, and organizational management.

Going forward, we will give the highest priority to responding to and providing appropriate remedies for those who suffered harm, while steadily implementing these measures and making appropriate public disclosures regarding their implementation.

We take the recommendations of the Third-Party Committee very seriously and will undertake fundamental reforms spanning human rights education, corporate culture, and our management and governance structures.

End