



# The Kyowa Kirin Group Code of Conduct

First edition: Established on October 28, 2016

Revised on April 1, 2021

Kyowa Kirin Co., Ltd.

## Management Philosophy

The Kyowa Kirin Group companies strive to contribute to the health and well-being of people around the world by creating new value through the pursuit of advances in life sciences and technologies

## Core Value

### Commitment to Life

Work for the most precious presence on this planet. Create value for patients, caregivers, healthcare professionals and customers.

### Integrity

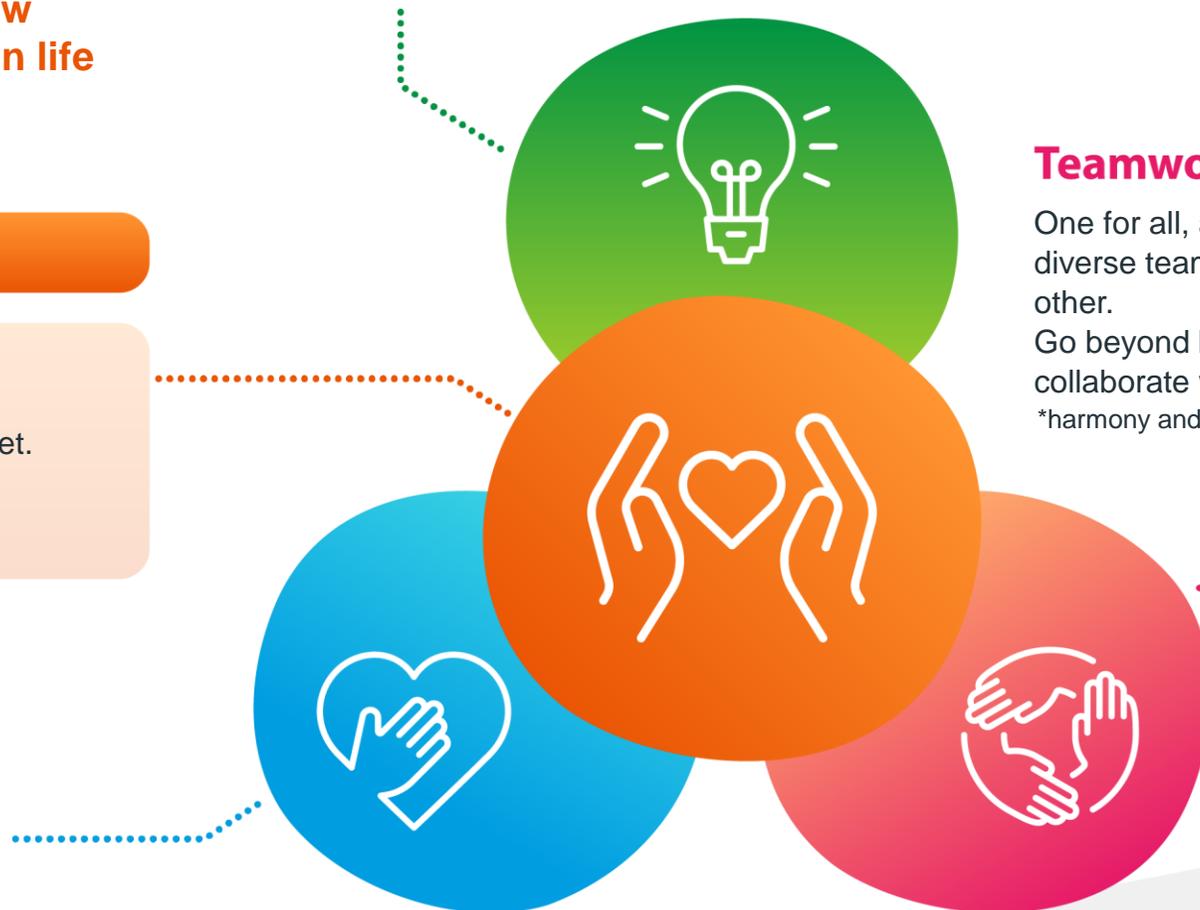
Do the right things. Be sincere and ethical consistently. Make a better world through good business practices.

## Innovation

Transform lives with passion and excitement. Challenge the status quo in all of our work.

## Teamwork/Wa\*

One for all, all for one. Work in diverse teams and respect each other. Go beyond boundaries and collaborate with stakeholders.  
\*harmony and loop among people



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## 1

## Purpose of this Code of Conduct

Pharmaceutical companies play an important role in the realization of a sustainable society through continuous development and stable supply of quality medicines on the basis of fair and free competition. The Kyowa Kirin Group (hereafter referred to as “Our Group”) is committed to realizing the successful creation and delivery of life-changing value by the diverse team of experts with shared passion for innovation and high ethical standards based on our core values to thereby fulfill our management philosophy of making contributions to the health and well-being of people all over the world.

Our Group has set forth the Code of Conduct, which explains specific actions taken in accordance with the Kyowa Kirin Group Compliance Policy and the Kyowa Kirin Group Risk Management Policy. The Code of Conduct also clarifies the actions that should be followed by everyone working in Our Group.

In Our Group “compliance” refers to acting ethically and with integrity in a socially responsible manner, with respect to all business activities of Our Group.

“Risk” in Our Group refers to effect of uncertainty on management objectives, including opportunity and threat.

This Code of Conduct provides model behavior that complies with laws, internal and external regulations, rules, and policies, to fulfill legal requirements and ethical responsibilities to society.

Our Group also encourages all supply chain partners with whom we work to follow the principles of the Code of Conduct.

Management  
Philosophy

Core Values

Group Compliance Policy  
Group Risk Management Policy

Code of Conduct

## 2

## Scope of this Code of Conduct

This Code of Conduct shall apply to everyone working in Our Group, regardless of country or region, position or title, such as officer, employee, fixed-term or dispatched employee, or full time or part time.

## 3

## Role of Officers

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Officers are responsible for implementing the spirit of this Code of Conduct.

- 1 Officers are responsible for disseminating this Code of Conduct to all companies of Our Group, ensuring they comply with this Code of Conduct and encouraging all supply chain stakeholders to comply with this Code of Conduct.
- 2 Through recognizing changes in social demands, officers will listen to the voices of employees, set business plans, and conduct business, in line with actual business conditions so as not to cause situations that contradict this Code of Conduct.
- 3 If a situation that contradicts this Code of Conduct occurs, officers will take the initiative in solving the problem, investigate the cause, and strive to prevent a recurrence.
- 4 Officers shall demonstrate their commitment to risk management and are accountable for enterprise risk management.



## 4

## Role of Managers

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Managers are responsible for observing this Code of Conduct and serving as a model in the workplace.

- 1 Managers will build an “open” and reliable workplace where employees can raise questions and concerns without fear of retaliation.
- 2 Managers will consider and work diligently to address and resolve the questions and concerns raised by members or based on their own insights.
- 3 Managers shall not leave questions or concerns even beyond the scope of their authorities, but will report them to their supervisors or to the appropriate departments or the local whistle-blowing procedure.
- 4 Head of each organization is accountable for the risk management of their organization and will deal with risks appropriately.

## 5 Raising questions and concerns

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We believe that it is one of our important responsibilities to raise questions and concerns when we do not know the appropriate course of action to take or when we feel something is wrong.

- 1 We will ask our superiors or appropriate departments for instructions, guidance, advice or clarifications.
- 2 When we become aware of non-compliance with this Code of Conduct or of any other unlawful or unjust actions, then we will promptly report it to our superiors, appropriate departments or use the appropriate local whistle-blowing procedure.
- 3 When we encounter difficulties in solving the non-compliance issue, then we will report it to the Headquarters of Our Group (CSR management department of KKC in charge) through the “KKC Group Compliance Line”.

For details of the KKC Group Compliance Line, please refer to the website indicated below:

**KKC Group Compliance Line URL:**  
<https://ml.helpline.jp/kyowakirin-complianceline/>

## 6 Prohibition of retaliation

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Our Group will strictly prohibit treating anyone reporting, being reported, investigating, or cooperating with the investigation of concerns relating to compliance or risk management, with any act of retaliation, threatening or disadvantage, and will take the necessary disciplinary or other appropriate action against anyone who takes any vindictive action or makes any threatening act against someone making such a report.

## 7 Response to non-compliant actions with this Code of Conduct

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Anyone who does not comply with this Code of Conduct may be subject to disciplinary actions based on the applicable rules of each company in Our Group.



Chapter **1**

# Relationship with Society

As a good corporate citizen, we provide new value to society through innovation and strive for sustainable economic growth and the resolution of social issues. To achieve this, we emphasize collaboration with various stakeholders.





# 1

**We will provide high-quality efficacious and safe medicines to meet the needs of patients, their families and healthcare professionals.**

- a** We will endeavor to obtain the trust of society in ensuring that our first priority is safety in all our activities ranging from procurement of raw materials to research, development, manufacturing, distribution, and marketing;
- b** We will ensure the proper handling of data and strict adherence to scientifically valid principles;
- c** We will provide scientifically verified information on quality, efficacy, and safety to promote the proper use of our medicines;
- d** We will play an important role in the promotion of medical care with patients' participation; and
- e** We will only conduct necessary experiments on animals as required as a non-clinical study, taking the welfare of animals into full consideration.





## 2 We will maintain lawful and ethical relationships with patients, their families, healthcare professionals and all other people supporting patients, shareholders, investors, employees, business partners, communities, governments, and other parties concerned with our business.

- a We will never consent to any illegal or unjust demands from inside or outside Our Group in our business activities;
- b We will never tolerate any corruption such as bribery, offers of unjust profits or illegal political donations; and
- c We will never have any connection with organizations involved in crime.



## 3 We will respect the economy, society, cultures and customs of countries and areas where we conduct business activities, and contribute to the development of local communities.

- a We will abide by the laws and regulations of the countries and regions in which we carry out our business activities;
- b We will endeavor to promote mutual understanding through open communication with the people in the countries and regions in which we carry out our business activities; and
- c We will act as responsible members of the countries and regions in which we carry out our business activities.



## Chapter 2

# Relationship with Employees

We will consider people to be the source of innovation, and develop people and organizations that take on the challenge of change by continually creating new value.





1

**We will provide workplaces and opportunities where people with diverse backgrounds** (including but not limited to sex, age, national origin, language, disability, medical care, marital status, with or without dependents, religion, ancestry, color, family or medical care leave, gender identity or expression, genetic information, political affiliation, protected veteran status, race, sexual orientation, or any other characteristic protected by applicable laws and regulations) **can demonstrate their own capabilities regardless of their backgrounds.**

- a We will endeavor to create a tolerant workplace culture in which everyone can express their views freely;
- b We will endeavor to create a workplace that will help harmonize work demands with individual lives;
- c We will endeavor to create a workplace where everyone will respect each other without any harassment or discrimination;
- d We will endeavor to enhance our capabilities by improving together through mutual encouragement;
- e We will endeavor to achieve business goals by working together in close cooperation; and
- f We will respect fair appraisals and foster a culture of inclusion and diversity.





## 2 We will create and maintain a workplace that is safe and ensures the physical and mental health of employees at all times.

- a We will abide by labor environment laws and regulations and will continue to place a priority on safety;
- b We will continuously engage in activities to prevent work-related accidents;
- c We will not allow any dangerous or violent actions or actions that disturb the order in the workplace;
- d We will never use illegal medication or substances in the workplace;
- e We will never bring in or use addictive substances that affect our duties and workplace environment; and
- f We will endeavor to maintain our physical and mental health to carry out our duties.





## Chapter 3

# Compliance with Rules

As a responsible pharmaceutical company, we comply with the provisions and spirit of applicable laws, regulations, rules, and social norms wherever we conduct business while acting in good faith and maintaining the highest ethical standards.



A photograph of a middle-aged man with short grey hair, wearing a light blue dress shirt and a matching tie. He is looking off to the side with a thoughtful expression, and his right hand is placed over his chest.

# 1

**We will abide by any applicable laws, regulations, rules, and social norms wherever we conduct business and will strive toward continuously updating our knowledge of these laws, regulations, rules, and norms.**

- a** We will never pursue profits that may be obtained by violating any applicable laws, regulations, rules, and social norms wherever we conduct business;
- b** We will never use Our Group's property for private purposes or apply expenses in an improper manner;
- c** We will actively collect information on relevant rule changes, such as amendments to laws and regulations throughout the world and revisions of regulations and rules inside and outside companies; and
- d** We will review internal rules appropriately according to social demands and changes in the corporate environment.





## 2 We will conduct appropriate transactions, distribution, and responsible procurement under fair and free competition.

- a We will engage in fair, transparent, and free competition and transactions, abiding by the competition laws of the relevant countries;
- b We will never expect any special treatment in return when we make donations;
- c We will never carry out or receive improper business entertainment or gifts that may violate social norms; and
- d We will never obtain employment or engage in transactions that would place us in conflict with Our Group's interests.



## 3 We will respect intellectual property rights.

- a We will properly use Our Group's intellectual property rights;
- b We will acquire the legal rights required for, among others, inventions created in the course of carrying out our business activities, as needed, and will endeavor to protect those rights; and
- c We will never infringe the intellectual property rights of other parties.



Chapter **4**

# Respect for Human Rights

We will respect human rights and diversity of all people.





**1 We are inclusive and do not discriminate based on race, ethnicity, national origin, social status, family origin, sex (including pregnancy), genetic information, disability, health and medical condition, thoughts and beliefs, sexual orientation, gender identity or expression, age, family or medical care leave, marital status, political affiliation, religion, employment status or any other characteristic protected by applicable laws and regulations.**

**2 We will not tolerate forced labor or child labor.**

- a** We will not countenance unfair, forced, child or other forms of slave labor; and
- b** We will not be involved with businesses or business partners who conduct unfair labor practices.



**3 We will not tolerate harassment of any type.**

- a** We will be fair to all people involved in Our Group's business activities; and
- b** We will not tolerate discrimination or harassment from or toward our business partners.

**4 We will respect the human rights of volunteers or patients in clinical studies.**



Chapter **5**

# Environmental Preservation

We will proactively initiate measures based on the recognition that addressing environmental problem is a mutual task of all the people and an essential requirement for corporate activities and survival.





# 1

## We will actively engage in environmental preservation and protection, including the promotion of resource recycling.

- a** In all our activities ranging from the procurement of raw materials to the research, development, manufacturing, distribution, and post-marketing services of products or merchandise, we will endeavor to care for the environment;
- b** We will procure resources, including raw materials and equipment, in a manner that minimizes our environmental impact;
- c** We will endeavor to reduce raw materials and energy consumption, in order to contribute to the conservation of natural resources and the prevention of global warming; and
- d** We will curb the amount of waste produced and engage in recycling.

# 2

## We will respect rules concerning the environment.

- a** We will endeavor to prevent environmental contamination and pollution-related health effects;
- b** We will observe environmental emission standards;
- c** We will treat waste properly; and
- d** We will handle chemical substances properly.



Chapter **6**

# Information Management

We will properly manage information concerning our business.





## 1 We will take sufficient measures to protect personal information and manage it properly.

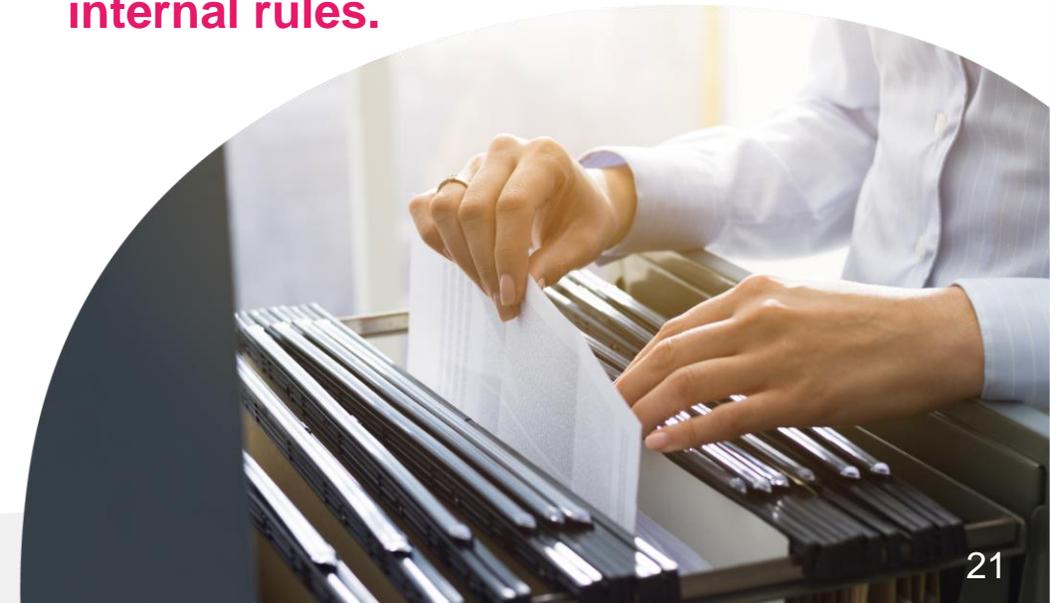
- a We will use personal information (including, but not limited to, that of patients, healthcare professionals, clinical trial participants, shareholders, business partners, and employees) obtained through our business activities, in compliance with laws and regulations; and
- b We will strictly manage personal information obtained through business activities to prevent it from being unlawfully disclosed to external parties.

## 2 We will take sufficient measures to protect confidential information and manage it properly.

- a We will use confidential information obtained from third parties in business activities in compliance with our contractual obligations; and
- b We will strictly manage confidential information obtained through business activities to prevent it from being unlawfully, accidentally, or otherwise disclosed to external parties.

## 3 We will store, discard and preserve intra-company documents according to applicable laws and regulations, as well as internal rules.

## 4 We will use Our Group's electronic equipment, such as information systems and computers (PCs), as well as the email systems, safely in accordance with internal rules.





## 5 We will not engage in insider trading.

- a When we come to know important facts about Our Group or other companies in our business activities, which are not yet publicly disclosed, we will refrain from divulging such information or from trading in the securities of relevant companies, such as stocks and bonds, up to the public announcement of such important facts.

## 6 We will make timely, appropriate, and fair disclosure of information to our stakeholders.

- a We will promptly and appropriately disclose to our shareholders and investors information that may affect achieving our business targets;
- b When there is a serious malfunction in our products or merchandise, we will disclose relevant information promptly, candidly, and fairly;
- c We will record Our Group's transactions, financial situation, and other relevant information in an accurate, timely, and sufficient manner;
- d We will not make deliberately false or misleading statements; and
- e When a lawsuit is filed against us, or investigations by public organizations start against us, we will properly preserve all relevant information.





## Chapter 7 Risk Management

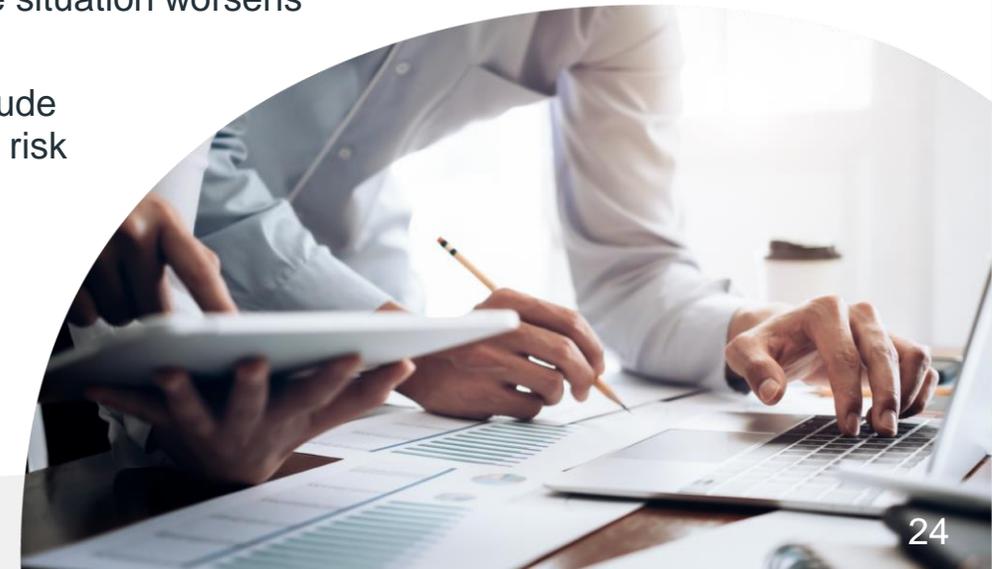
We will appropriately take necessary risks to create new value and take actions to protect Our Group and stakeholders from threats.





# 1 We will manage risks, including those we have not faced before, in a forward-looking manner by taking a proactive approach.

- a We will properly take necessary risks to realize the successful creation and delivery of life-changing value with shared passion for innovation;
- b We will thoroughly consider potential risks in order to serve the interests of ourselves, our families and colleagues, and most of all in order to avoid any betrayal of the trust invested in us by patients and the public;
- c We will define rules after understanding objectives. We recognize that failing to observe rules or to review rules despite changes in circumstances or conditions put patients and the public at risk;
- d It is when no one is aware of any problems that we are most cautious and careful to investigate whether there are any hidden or unknown potential risks;
- e We will promptly raise questions or concerns before a risk increases and the situation worsens so as to resolve the risk and improve the situation at an early stage; and
- f Understanding the courage involved in doing so, we will welcome with gratitude any questions or concerns raised by others, share awareness of any related risk and respond to it after a serious discussion of the worst-case scenario.





## 2 Officer and Head of each organization are accountable for managing crises with resilience by preventing, preparing for, early detection of, and responding quickly to crises in a comprehensive manner and will:

- a when any sign of a crisis is detected, implement crisis management in line with risk management before any crises occur so as to prevent and prepare for crises;
- b assume the worst-case scenario and plan actions that will minimize the effects and help us promptly return to normal business operations; and
- c when such sign develops into a real crisis, prioritize human life and health, and promptly and appropriately take actions that have planned in advance.

