

## The Kyowa Kirin Group Code of Conduct

### Introduction

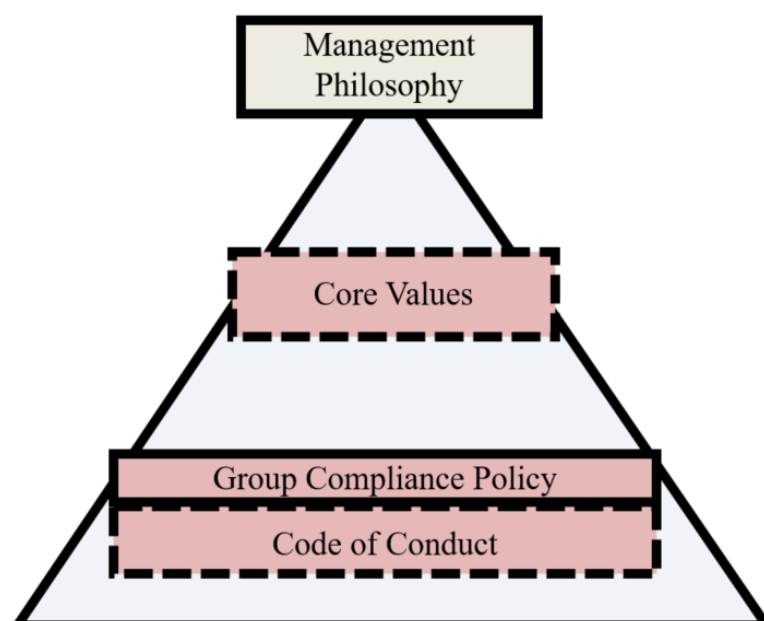
#### 1. Purpose of this Code of Conduct

A corporation should be an entity which benefits society by creating new value through fair competition and ethical business practices. We at the Kyowa Kirin Group (hereafter referred to as “KKC” and/or “Our Group”) strive to become a corporate group that is trusted by society through behavior based on high ethical standards and thereby fulfill our management philosophy of making contributions to the health and well-being of people all over the world.

In order to explain the code of conduct that must be observed by every officer and employee in their business activities, Our Group has established, along with the KKC Group Compliance Policy, this present Code of Conduct, which provides specific guidelines for behavior under the KKC Group Compliance Policy.

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.

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



<References>

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 Values

Core Concept:

“Commitment to Life”

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

Keywords:

“Integrity”

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

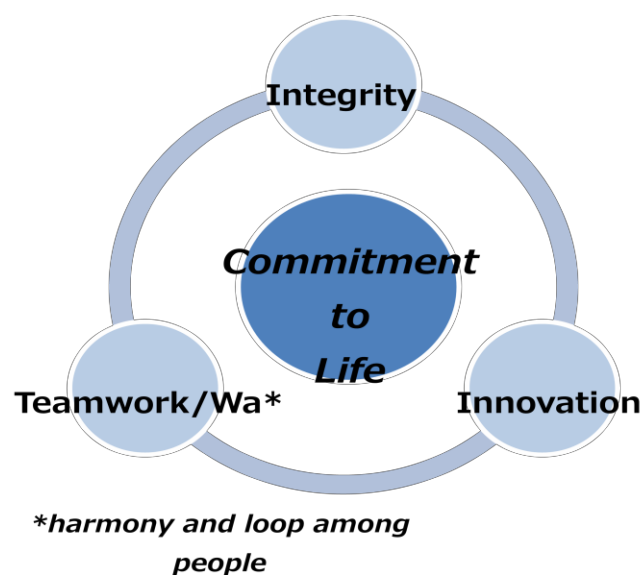
“Innovation”

- 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*



## 2. Scope of this Code of Conduct and response to non-compliant actions

This Code of Conduct shall apply to every officer and employee working in Our Group.

If the acts of an officer or an employee do not comply with the provisions of this Code of Conduct, Our Group will take the necessary disciplinary or other appropriate action based on the applicable laws, rules and regulations of each company in Our Group.

## 3. Raising questions or concerns

We believe that we have an important responsibility to raise questions or concerns when we do not know the appropriate course of action to take or when we feel that something is wrong.

- 1) We will ask our superiors or appropriate departments for instructions, guidance, advice or explanations.
- 2) When we become aware of non-compliance with this Code of Conduct or of any other unlawful or unfair actions, we will promptly report it to our superiors, the appropriate department or use the appropriate local whistle blowing procedure.
- 3) When we have already consulted or reported a non-compliance issue under (1) or (2) above and continue to encounter difficulties solving the non-compliance issue, 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 please refer to the website indicated below:

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

- 4) Our Group will not treat anyone reporting through the KKC Group Compliance Line with any act of disadvantage or discrimination 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.

## Chapter 1 Relationship with Society

We, as good members of society, will build friendly and ethical relationships with all our stakeholders.

We will endeavor to create new value in cooperation with various stakeholders.

- 1) We will strive to maintain high quality products, and to provide products and services which will satisfy the needs of our customers.

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:

- a) We will place first priority on safety and endeavor to obtain the trust of our customers and of society; and
- b) We will ensure the proper handling of data and strict adherence to scientifically valid principles.

- 2) We will maintain legal and ethical relationships with customers, shareholders, investors, employees, business partners, communities, governments, and other parties concerned with our business:

- a) We will never accede to any illegal or unfair demands from inside or outside Our Group in our business activities;
- b) We will never be involved in any corruption such as bribery, offers of illegal 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 in countries and areas where we have business activities, so that we will be in harmony with 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 respect each member's individuality and endeavor to maintain a friendly workplace environment.

- 1) We will promote diversity and equal opportunities by providing workplaces where people can demonstrate their own capabilities regardless of their background:
  - 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 diverse human resources.
  
- 2) We will strive to maintain safe working environments:
  - 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; and
  - c) We will not allow any dangerous or violent actions, or actions that disturb the order in the workplace.
  
- 3) We will seek to improve the working environments so as to ensure our employees' physical and mental well-being:
  - a) We will never use illegal medication;
  - b) We will never use addictive substances that affect our duties and workplace environment; and
  - c) We will endeavor to maintain our physical and mental health to carry out our duties.

## Chapter 3 Compliance with Rules

We will behave with integrity and ethically, while complying with social rules.

- 1) We will abide by applicable laws, regulations, rules and policies, and strive to update our knowledge:
  - a) We will never pursue profits that may be obtained by violating any laws and regulations or internal and external policies;
  - b) We will never use Our Group's property for private purposes or apply expenses in an improper manner; and
  - c) We will promptly collect information on relevant rule changes, such as important revisions to laws concerning our business activities.
  
- 2) We will engage in fair competition and ethical business practices:
  - 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 characteristics of all people.

- 1) We are committed to a policy of non-discrimination in any shape or form:
  - 2) We will not tolerate forced labor or improper child labor: and
  - 3) We will not permit harassment of any type.
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- a) We will be fair to all people involved in Our Group's business activities;
  - b) We will not tolerate discrimination or harassment from or toward our business partners; and
  - c) We will never have relations with any customers or business partners involved in improper labor practices.

## Chapter 5 Environmental Preservation

We will actively engage in the preservation of the global environment to safely hand it over to the next generation.

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

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:

- a) We will procure resources, including raw materials and equipment, in a manner that minimizes our environmental impact;
- b) We will endeavor to reduce the amount of raw materials and energy used, in order to contribute to the conservation of natural resources and the prevention of global warming; and
- c) We will curb the amount of waste produced and engage in resource recycling.

- 2) We will respect applicable laws, regulations and rules concerning the environment.

We will endeavor to prevent environmental contamination and pollution-related health effects:

- a) We will observe environmental emission standards;
- b) We will treat waste properly; and
- c) We will handle chemical substances properly.



## Chapter 6 Information Management

We will properly manage information concerning our businesses.

- 1) We will properly manage personal data:
- 2) We will properly manage confidential information:
  - a) We will never use the personal data or confidential information we obtain in carrying out our business activities for improper purposes;
  - b) We will strictly manage the personal data or confidential information we obtain in carrying out our business activities so that they are not divulged externally;
  - c) We will store, discard and preserve intra-company documents according to the applicable laws and regulations, as well as intra-company regulations and procedures; and
  - d) 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 the intra-company rules.
- 3) We will not engage in insider trading:
  - a) When we come to know important facts about Our Group or other companies, which are not yet publicly disclosed, in our business activities, 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.
- 4) We will make timely and appropriate disclosure of information to our stakeholders in accordance with applicable laws, rules and regulations:
  - 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 never make false or misleading statements on the record; and
  - e) When a lawsuit is filed against us, or we undergo examinations by public organizations, we will properly preserve all relevant information.

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