

The Kyowa Kirin Group Code of Conduct

Introduction

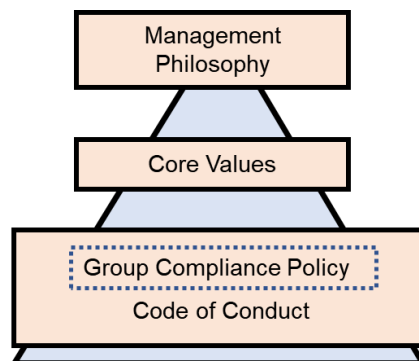
1. Purpose of this Code of Conduct

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 creating new values and fulfilling its social responsibilities based on our core values and high ethical standards 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 clarifies the actions that should be followed by all officers, trustees, managers and employees which is including temporary or contracted worker, or otherwise, whether full-time or part-time in business activities.

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

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 Kyowa Kirin Group Compliance Policy.



2. Scope of this Code of Conduct

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

3. Role of Officers

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

- 1) Officers are responsible for disseminating this Code of Conduct to their own companies and group companies, 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 management goals and conduct business in line with actual business conditions so as not to cause situations that violate this Code of Conduct.
- 3) If a situation that violates this Code of Conduct occurs, officers will take the initiative in solving the problem, investigate the cause, and strive to prevent recurrence.

4. Role of Managers

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 hard to resolve the questions and concerns that our members have raised or they have found themselves.
- 3) Managers shall not just ignore questions or concerns, even beyond the scope of their authorities, but convey them to their supervisors or appropriate departments or the appropriate local whistle-blowing procedure.

5. Raising questions or concerns

We believe that have an important responsibility to raise questions or concerns when they do not know the appropriate course of action to take or when they feel that 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 have already consulted or reported a non-compliance issue under (1) or (2) above and continue to encounter difficulties 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 or the appropriate local whistle blowing equivalent”.

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

Our Group will strictly prohibit treating anyone reporting, being reported, investigating, or cooperating with the investigation of concerns relating to compliance, 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

If the acts of an officer, a trustee, a manager or an employee do not comply with the provisions of this Code of Conduct then Our Group will take the necessary or other appropriate action 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 satisfy the relevant patient population and all of the people who support patients such as 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 patient participatory medicine]; and
- e) We will only conduct necessary experiments on animals as required by medical or regulatory guidelines taking the welfare of animals into full consideration.

2) We will maintain legal and ethical relationships with patients, all of the people who support patients such as families and healthcare professionals, 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 in countries and areas where we have business activities and contribute to the development of the local community.

- 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 mental and physical 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;
- 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 do business while acting in good faith and maintaining the highest ethical standards.

1) We will abide by any applicable laws, regulations, rules, and social norms wherever we do business and will strive toward continuously updating this knowledge.

- a) We will never pursue profits that may be obtained by violating any applicable laws, regulations, rules, and social norms wherever we do business;
- b) We will never use Our Group's property for private purposes or apply expenses in an improper manner; and
- 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.

2) We will conduct appropriate transactions, distribution, and responsible procurement with 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 characteristics 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 to address environmental problems as a mutual task of all the people and, in doing so, recognize that addressing such matters are an essential requirement for a corporation's existence and operation.

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

d) We will curb the amount of waste produced and engage in resource 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 businesses.

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

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 properly manage it.

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 intra-company 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 the intra-company 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.

End

<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*

