



Policy Statement on Global Anti-Bribery and Anti-Corruption

Purpose

Santen is always expected to act with integrity and make ethical decisions in all aspects of our business based on Santen's Values, Code of Practice, Global Compliance Policy, and all applicable anti-bribery/anti-corruption laws. Santen shall not tolerate and strictly prohibits, bribery, corruption, and improper influence to Government Officials (GOs) in our direct business dealings, or by a third party acting on our behalf. For the purpose of avoiding bribery and corruption, Santen does not distinguish GOs and employees of private sector organizations. Also, in the context of bribery and corruption, GOs are usually very broadly defined so our customers, such as Healthcare Professionals (HCPs), may be considered as GOs in some cases. This policy reinforces our global commitment to maintaining a fair and high ethical standard when interacting with GOs, HCPs and the healthcare community.

Policy

1. Prohibitions of Bribes

Santen shall comply with all applicable laws, rules, regulations, codes, and guidelines related to anti-bribery and anti-corruption in all jurisdictions in which they operate.

Santen must recognize that GOs are often subject to rules and restrictions that do not apply to persons who operate in the private sector. Any relationship with GOs must be in strict compliance with the rules and regulations to which they are subject.

Santen shall not, directly or indirectly, offer, promise, give, solicit, authorize, or accept bribes in any form. This may include payments, or anything of value, to any GOs, HCPs, private individuals, healthcare institutions, or corporations for the purpose of obtaining or retaining business or improperly influencing any decision or action of the recipient. An improper payment or anything of value can include, but not limited to, financial payments, gifts, entertainment, services, meals, and travels.

2. Gifts, Entertainment and Hospitality

Gifts for the personal benefit (e.g., cash, cash equivalents such as gift cards, sporting or entertainment tickets, electronics items, social courtesy gifts, etc.), including provision of personal services of HCPs and GOs (whether direct or indirect) are prohibited.

Entertainment, social activities, and recreational events may not be organized for any HCPs or GOs.

Business meals with HCPs and GOs may be provided only when conducting a meeting/event for



a legitimate business purpose and must be modest as judged by applicable local laws/regulations and industry standards.

3. Grants, Charitable Contributions, Political Contributions and Other Funding

Santen may not use Grants, Charitable Contributions, political contributions, or other funding to illicitly gain or secure a business advantage or influence the decision making by a GO, HCP, or any healthcare and or governmental organization. Where allowed under applicable local law, industry codes, and or acceptable local customs and practices, requests for such funding will be subject to review in accordance with the relevant Santen internal review processes and or approval committees.

4. Facilitation payments

Santen prohibits facilitation payments irrespective of local laws and or industry codes that may permit facilitation payments.

5. Third Parties

When Santen interacts with GOs, HCPs and or any healthcare and or governmental organization through a third party, it is required that such third party complies with all requirements, standards, and guidelines set forth in Santen's policies. Additionally, Santen may never circumvent applicable laws, regulations and/or our policy, by using a third party to do what Santen cannot itself do lawfully, or in compliance with internal policies and guidelines.

6. Books and Records

Santen must prepare and maintain books and records that accurately reflect transactions, payments, expense for anything of value in reasonable detail.

This policy statement summarizes our internal policies, guidelines, and SOPs for the captioned matter for ease of understanding material points.

*This policy has been approved by the Board of Directors.