



## Policy Statement on Transparency

### Purpose

Santen is always expected to act with integrity and make ethical decisions in all aspects of our business based on Santen's Values and Code of Practice. Santen conducts medical/pharmaceutical research and development of our products that at times, requires collaboration with Healthcare Professionals (HCPs) and/or Healthcare Organizations (HCOs). Additionally, we also disseminate information on the proper use of our products and services and our medical findings to HCPs and HCOs through activities such as, academic lectures, speaker programs, and in-office/out-of-office HCP interactions. These interactions with HCPs and HCOs are essential to help improve patient care and often require financial relationships including payment of fees for their professional services. With that, Santen maintains full compliance with applicable laws, regulations and industry codes and discloses such information to avoid potential perceptions that the objective judgment of HCPs/HCOs could be influenced or that potential conflicts of interest, either real or perceived, could exist. This policy defines our commitment to achieve greater transparency in the financial relationships with HCPs/HCOs in research, education, clinical practices and all aspects of such HCP interactions. Santen is responsible for the accurate and timely recording and reporting of transfers of value and/or payments to HCPs and HCOs in accordance with applicable local laws/regulations and industry standards.

### Policy

#### Transparency Reporting

Santen must collect and disclose payments and other transfers of value provided to HCPs and HCOs in the country of residence and registration, respectively, in accordance with applicable laws, regulations and industry standards.

Special attention is needed to the timing of reporting, i.e., before, immediately after, or at a specified due date, of the engagement.

Subject to applicable laws, regulations and industry codes, reportable transfers of value may include, but are not limited to:

- Meals
- Educational items and Items of medical utilities
- Compensation for services and expenses relating to the provision of services
- Travel and lodging
- Research funding or grants
- Sponsorships of events
- Charitable contributions/donations
- Royalties
- Ownership or investment interests
- Space rental or facility fees



Santen will utilize applicable processes, systems and tools to capture and document potentially reportable transfers of value.

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