



Policy Statement on Ethical Interactions with Patients and Patient Organizations

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 Santen Code of Practice. As a life-science company that looks to maximize our contributions to society and advance patient care, Santen places high values on understanding the needs and desired outcomes of patients by listening to their perspectives, and collaborating with organizations representing voices from patients and their families/caregivers. When interacting with patients and patient organizations, Santen always tries to understand their purposes and activities, while ensuring we acknowledge and respect their independence. Santen is committed to ensuring that all such interactions with patients and patient organizations are done so in a compliant and ethical manner that is in line with this policy and all relevant local laws/regulations, guidelines and industry codes. Additionally, to increase social awareness of our activities and enhance transparency, Santen accurately records financial relationships with them and discloses it as required by applicable local laws/regulations, guidelines and industry codes.

Policy

1. Interactions with Patients and Patient Organizations

When working with patients and/or patient organizations, Santen must ensure that the involvement of the company and the nature of that involvement are clear from the outset and made transparent throughout the interactions.

Santen may provide financial support for patient organization meetings provided that the primary purpose of the meeting is professional, educational, and scientific in nature, or otherwise supports the mission of the patient organization, unless prohibited or restricted by local laws/regulations, guidelines and industry code. Santen will not provide sole (exclusive) financial support of patient organizations or any of its programs.

If Santen provides financial support or in-kind contribution to patient organizations, a written letter of agreement setting out the nature of support, including the purpose of any activity and its funding is required. Depending applicable local laws/regulations, guidelines and industry code, such support or contribution must be disclosed under transparency reporting requirements.

Consultant arrangements may also be executed with patients or patient organizations. All engagements must be based on a legitimate need for the service and confirmed in a written agreement signed by both parties before commencing any services. Compensation for services must be reasonable in relation to the services rendered.

The venue and location of any meetings for patients or patient organizations must be appropriate and conducive to informational communication.

Any meals or refreshments provided by Santen at a meeting for patients or patient organizations must be modest and socially acceptable as judged by local standards.



Santen must treat patient information with respect and protect confidentiality.

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