



Policy Statement on Ethical Interactions with Healthcare Professionals

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. This policy defines our global commitment to advancing patient care and to enhancing the practice of medicine through ethical interactions with Healthcare Professionals (HCPs) that meet with the highest standard of integrity and comply with applicable laws and regulations.

As a global ophthalmic company operating worldwide, in a highly regulated healthcare industry, Santen is committed to fully complying with applicable laws, regulations and guidance issued by regulatory authorities when interacting with HCPs, Healthcare Organizations (HCOs) and the healthcare community at large. Additionally, all such interactions must not be intended to unlawfully induce or influence them to prescribe, recommend, purchase, supply or administer products or services of Santen.

Policy

1. Fee for Service and Fair Market Value

Santen will only engage HCPs/HCOs on a fee for service basis for a legitimate business need, which is a bona fide need the Company has for reviewing, examining, discussing, pursuing, executing and implementing its business and strategy. HCPs/HCOs to be engaged need to have qualifications and/or equipment appropriate for a legitimate business need, and the number of HCPs engaged, and the aggregate services contracted must be appropriate to achieve the legitimate business need. Fee for service arrangements must never be used as a way to disguise a payment that would not otherwise be allowed such as promoting or prescribing a product or other activity that violates any laws or regulations.

Santen may not pay HCPs/HCOs a fee greater than the Fair Market Value (FMV) that has been established, for the services provided by the HCPs/HCOs.

All services to be provided and the fees associated with such services must be clearly documented in a written agreement, which must be fully executed by both parties before services or payments are exchanged.

2. Meetings and Events

The purpose and focus of all meetings and events organized or sponsored by Santen (including, but not limited to symposia, congresses and other promotional, scientific or professional meetings) must be to provide scientific, medical or educational information and/or to inform HCPs about products and disease areas.

Santen organized events must be held in an appropriate venue that is conducive to the purpose and scientific or educational objectives of the meeting or event.

Santen sponsored events may not take place outside of the HCP's country of practice unless it is appropriate and justified to do so from a logistical or security point of view. Events at international scientific congress and symposia that involve participants from many countries are permitted.

Each HCP in attendance at a Santen organized or sponsored meeting must have an objective and



legitimate business need to attend the meeting. For Santen organized meetings and events, guests of HCP attendees (e.g., family members and friends) are not permitted.

3. Meals, Travel and Accommodations

Any meals or refreshments with HCPs may be provided only when conducting a meeting/event for a legitimate business need, and may never be used as an incentive for HCPs/HCOs to prescribe, use or recommend Santen products and services.

Such business meals must be held in an appropriate venue and must be occasional and modest in accordance with applicable local laws and industry standards.

When paying for or reimbursing a HCP for expenses of travel necessary for attending a meeting/event or providing services for Santen, such expenses must not be extravagant in a manner that is consistent with applicable laws, regulations and industry codes and its reimbursement requires appropriate documentation.

Santen will not provide financial support such as meals, travel and accommodations for spouses or family members or guests of HCPs.

4. Gifts and Entertainment

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

Entertainment, social activities and recreational events may not be organized for any HCP.

5. Promotional Aids

Providing or offering promotional aids (such as brand reminders, pens, notepads, sticky notes, mouse pads, calendars, mugs, and other items with the Company or a product name or logo) to HCPs in relation to the promotion of prescription only medicines or medical devices is prohibited. Notwithstanding the prohibition, pens and notepads can be provided to HCPs in the context of Santen organized events for the purpose of taking notes during the meeting. They must not bear the name of any product but may bear the name of the Company. In addition, they must be of minimal value and only the necessary quantity may be distributed.

For over-the-counter products, providing promotional aids of minimal value is permissible if relevant to the practice of the HCP.

6. Educational Items and Medical Utilities

Santen may provide informational or educational items, and/or items of medical utility only for education of HCPs and patients on disease and its treatments or for enhancing medical treatment and such items should not be offered on more than an occasional basis to a given HCP. These items can include the company name, but must not be product branded, unless the product's name is essential for the correct use of the item by the patient.

Informational or educational items designed primarily for the education of HCPs and patients on disease and its treatments should not have independent value. Such items as the value of books, subscriptions and other informational or educational items must be reasonable.

Items of medical utility with modest value and beneficial to enhancing the provision of medical services and patient care should not be provided if they are expected to be supplied by the HCPs or their employers in the course of routine business practice.



7. Product Samples, Evaluation Products and Demonstration Products

To enable HCPs to evaluate and/or familiarize themselves with Santen products, Santen may provide limited quantities of free pharmaceutical or medical device products to HCPs in accordance with local law/regulations and industry standards. Such Free Products (Free Product) are usually called product samples, evaluation products and demonstration products. Free Product should never be provided to improperly induce HCPs/HCOs to do business with Santen and provision of Free Product may be made only to the qualified HCPs/HCOs in reasonable quantities and frequencies for the legitimate purpose under the circumstances. Provision of Free Product will be accurately recorded and tracked.

8. Grants and Charitable Contributions/Donations

Grants and charitable contributions/donations must never be offered or provided as a reward or incentive for past, present or future use or purchases of Santen products and they must be free from commercial influence and must not be linked to any commercial activity. Such grants and charitable contributions/donations cannot be provided to individual HCPs but be provided to organizations unless otherwise noted in local laws, regulations and industry code, and also must be properly documented.

Grants may be provided to support a bona fide medical education program and/or events related to current disease states, patient care, or scientific and independent medical information, and studies. Requests for Grants must be unsolicited and independently submitted by applicants so that Santen may not influence or assist with the development of the medical education program or the research for which grant is sought. Grants may not support recreational events, entertainment, promotional activities, or fee for service activities.

Charitable contributions/donations may be made to support initiatives and organizations that are aligned with Santen's focus on improving patient health in Santen's therapeutic areas and more generally. Such charitable contributions/donations may not be provided to support individual HCPs, groups of HCPs or physician practices, nor may they be provided to organizations with political or religious association.

9. Commercial Sponsorship

Commercial sponsorship is arranged between Santen and an organization in exchange for a tangible benefit such as exhibit booths or advertising, and must be given only to an external, independent organization. The level of sponsorship should reflect a commercially reasonable fee in exchange for the marketing and promotional benefits received by Santen, with consideration for the size of the exhibition space, expected number of attendees, duration of the exhibition, etc. All requests for commercial sponsorships must be unsolicited by Santen and submitted officially by the requesting organization in writing to Santen.

10. Sponsorship for HCPs (Direct Sponsorship)

Direct sponsorship may be provided to HCPs to support their attendance at third party educational event or company standalone event for the purpose of advancing the standards of healthcare, providing HCPs with educational information, enhancing medical knowledge and improving the quality use of medicines/device, always subject to applicable local laws, regulations and industry codes. In a country/region where direct sponsorships are permissible for pharmaceuticals but not for



medical devices, then the direct sponsorship for pharmaceuticals is only permissible if operations are separate from those of the medical device business. Arrangement between pharmaceutical and medical device operations to bypass these restrictions is not permissible. Direct sponsorships should never be an inducement to prescribe, purchase, use, or recommend Santen products. Direct sponsorship agreements must be executed between Santen and the HCP or event organizer, specifying the payments/items that are sponsored by Santen. No payments are made to compensate HCPs for the time spent in attending the event.

11. Investigator Sponsored Trials

Santen's funding of Investigator-Sponsored Trials (ISTs) is intended to enhance clinical and/or scientific knowledge of disease, therapy, and Santen products to ultimately benefit patients. IST funding should never be used as an incentive for HCPs to prescribe, purchase, use, or recommend Santen products, and Santen's sales and marketing function cannot influence IST funding or discuss IST with investigators. An IST agreement must be executed before providing IST funding.

12. Interactions with Third Parties

Santen may engage a third party only for legitimate business needs and may not ask, induce, or knowingly permit a third party to take actions that are not permitted by applicable laws and regulations or by this Policy. Santen may never circumvent applicable laws, regulations, and this Policy, by using a third party to do what Santen cannot itself do lawfully or in compliance with internal policies and guidelines.

No payment may be made or promised to a third party except in exchange for legitimate services to be done by it. Any such payment must be in an amount that is not greater than the Fair Market Value of the legitimate services to be received. All payments must conform to the requirements of local law and should be properly documented.

Santen must ensure that appropriate contracts or other comparable documents are in place for all business arrangements with third parties. Such documents must clearly set forth all material terms and conditions and never be created as a false record to pursue an improper purpose.

13. Interactions with Government Officials (GOs)

Engagement of HCPs who are GOs must be in strict compliance with the rules and regulations and Santen's internal relevant policy to which they are subject.

14. Cross-Border Interactions with HCPs/HCOs

With regard to the region in which a HCP is licensed and/or practices or where a HCO is registered, interactions with HCPs and HCOs remain subject to applicable laws, regulations and industry codes of such region including approval and disclosure requirements and limitations related to HCP/HCO fees and expenses, regardless of where an interaction occurs or which country's company engages a HCP/HCO.

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