



Policy Statement on Conflicts of Interest

Purpose

Santen is always expected to act with integrity and make ethical decisions in all aspects of our business based on Santen's Values, Santen Code of Practice. Santen respects its employees' rights and choices and does not wish to interfere with their personal lives. Having a conflict of interest itself is not always necessarily wrong, however, making business decisions or pursuing actions that place one's own personal interest ahead of the Company's interest, would damage our business, our stakeholders' rights and benefits and may potentially have legal and regulatory consequences. Santen must address such conflicts of interest in a professional and ethical manner to ensure that business decisions are conducted in the right way. This policy establishes our global commitment to ensure that our personal interests do not influence our business judgement or decision-making.

Policy

Conflicts of Interest

Santen have an obligation to conduct business within this policy, or any other Santen policies or procedures, or laws, regulations or industry codes, relating to conflicts of interest that prohibit actual or potential conflicts of interest.

Santen employees and those acting on behalf of Santen, may never place their own personal interests ahead of Company business interests when selecting business partners and trading with them for the Company. When doing business, Santen employees and those acting on behalf of Santen must always exercise professional judgment in the best interests of the Company and should never seek personal gain as a condition of establishing or continuing a business relationship for neither themselves nor their families.

An actual or potential conflict of interest occurs when a Santen employee or any other person(s) acting on Santen's behalf, is able to influence a decision that may result in a personal gain for that person(s), as a result of Santen's business dealings. If employees or any persons acting on Santen's behalf, have any influence on transactions, including but not limited to purchases, contracts, or leases through access to confidential information or participation in the decision-making process, it is imperative that they disclose to internal resources such as their supervisor, manager or to Legal, Compliance, Human Resources the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

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