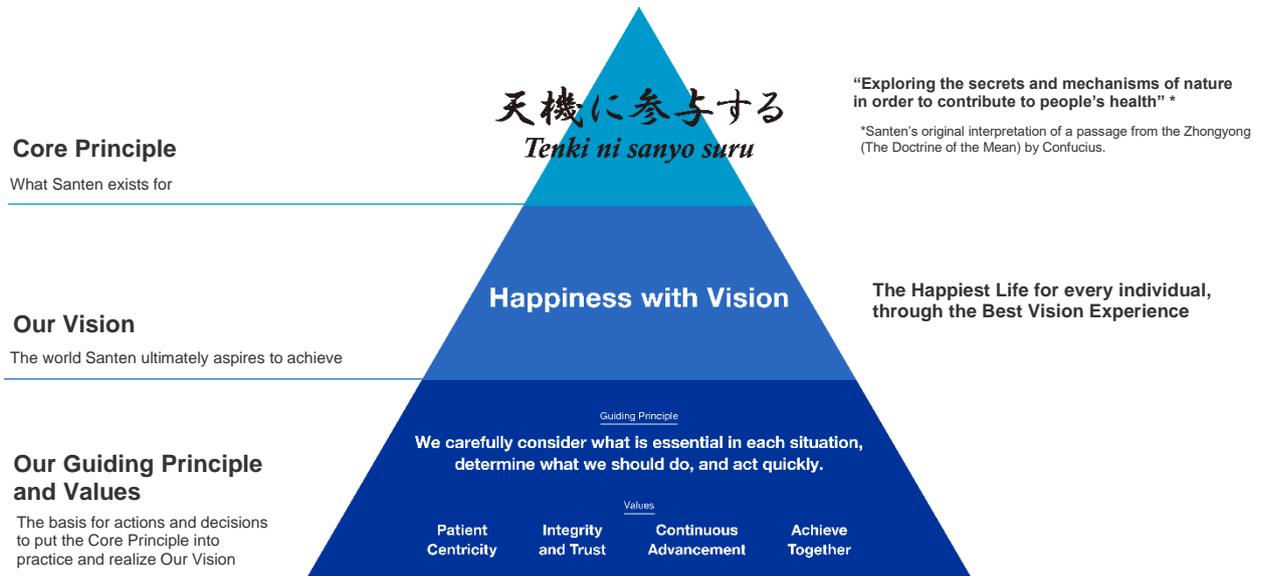


Santen Code of Practice

Santen's Corporate Philosophy Framework



Our Guiding Principle and Values



Guiding Principle We carefully consider what is essential in each situation, determine what we should do, and act quickly.

Values

Patient Centricity Always contributing to the happiness of patients and their loved ones whenever we think, decide and act

Integrity and Trust Being committed to fulfilling our responsibility as a member of society, improving the quality of our work and earning the trust of the people around us

Continuous Advancement Striving for growth and challenge, cultivating knowledge and organizational skills unique to Santen, and continuing to create new value

Achieve Together Bringing together diverse internal and external capabilities and working tenaciously to achieve results

Santen Code of Practice

The Santen Code of Practice presents the specific norms of conduct to be observed in connection with our business activities, here referring to compliance with laws and regulations as well as the actions based on Santen's Fundamental Philosophy and required of individuals working in the Santen Group. The Basic Principles for Internal Control (system established to ensure proper business) determined by Santen's Board of Directors also specifies guidelines for conduct in connection with our corporate activities.

The Code of Practice comprises the Declaration of Corporate Behavior and Code of Conduct. The Declaration of Corporate Behavior expresses how we at Santen intend to act with regard to customers, employee responsibility, and our society. The Code of Conduct orients decision-making with regard to specific actions.

Declaration of Corporate Behavior

I. Building Trust with Customers

1. We pursue timely and efficient research and development to produce useful and innovative pharmaceuticals and related products that our customers desire in order to maintain and enhance people's health.
2. We efficiently and stably provide high-quality pharmaceuticals and related products with excellent efficacy and safety that our customers may trust.
3. We promptly provide accurate and reliable information on quality, efficacy, safety, and other matters about pharmaceuticals and related products as part of our fair sales and marketing activities in order to promote the optimal use of pharmaceuticals and related products.

II. Promoting Employee Responsibility and Growth

1. We create a safe and comfortable workplace environment that is also proactive, humane, and enriching by pursuing self-improvement, fulfilling our expected roles, and respecting individual rights, personalities, and characteristics.
2. We protect, manage, and effectively utilize Santen's assets, funds and information with full recognition of their value and according to applicable rules.
3. We promote mutual understanding with our stakeholders, and build and maintain fair, transparent, and free relationships with them that merit society's trust.

III. Maintaining Harmony with Society

1. We protect nature and actively work to preserve the global environment.
2. As a responsible corporate citizen, we engage in activities that contribute to society, promote dialogue, and progress in harmony with society.

Code of Conduct

I. Building Trust with Customers

1. We pursue timely and efficient research and development to produce useful and innovative pharmaceuticals and related products that our customers desire in order to maintain and enhance people's health.

1-1 Research and development

We conduct research and development on pharmaceuticals and related products while compiling accurate and highly reliable data on efficacy, safety, and other matters in full consideration of ethics in human life.

We conduct animal testing only in absolutely necessary cases from the standpoint of animal welfare, using as few animals as possible, while at the same time devising ways to mitigate animal suffering and developing alternative testing methods.

1-2 Clinical studies

We conduct clinical studies while respecting the human rights of participating subjects and giving full consideration to safety.

We assess the results of clinical studies objectively and with the greatest scientific rigor.

1-3 Post-marketing studies

Upon manufacturing and marketing our products, we collect, evaluate and analyze scientifically verified information on their quality, efficacy, and safety from domestic and international sources, and devise necessary measures to prevent the emergence or spread of potential health hazards as well as to promote optimal use.

I. Building Trust with Customers

2. We efficiently and stably provide high-quality pharmaceuticals and related products with excellent efficacy and safety that our customers may trust.

2-1 Manufacturing

We conduct sufficient manufacturing and quality control throughout the entire manufacturing process to ensure an efficient and stable supply of highly reliable quality pharmaceuticals and related products.

In the case of a quality issue with a pharmaceutical or related product, we will promptly conduct a fact-finding investigation to determine the causes and devise the necessary response.

2-2 Quality assurance

We assure high levels of quality, efficacy and safety in our pharmaceuticals and related products that is backed by the latest science and technology.

2-3 Distribution

We assure the quality of pharmaceuticals and related products during distribution.

We engage appropriately in exportation and importation that complies with applicable domestic and international laws and regulations.

I. Building Trust with Customers

3. We promptly provide accurate and reliable information on quality, efficacy, safety, and other matters about pharmaceuticals and related products as part of our fair sales and marketing activities in order to promote the optimal use of pharmaceuticals and related products

3-1 Promotion

We conduct sales and marketing activities in a transparent and fair manner in compliance with the Fair Competition Code, which is the pharmaceutical industry's voluntary rules, and Santen's own Promotion Code and other relevant standards.

3-2 Safety controls on pharmaceuticals and related products

We obtain information concerning the safety of pharmaceuticals and related products as rapidly as possible, and prevent the spread of undesirable side-effects and other forms of damage.

3-3 Dissemination of information on pharmaceuticals and related products

We rapidly disseminate accurate scientifically verified information on the quality, efficacy and safety of pharmaceuticals and related products.

3-4 Advertising and public announcements

We conduct advertising and public announcements in a creative and appropriate manner that does not mislead customers or the general public.

II. Promoting Employee Responsibility and Growth

1. We create a safe and comfortable workplace environment that is also proactive, humane, and enriching by pursuing self-improvement, fulfilling our expected roles, and respecting individual rights, personalities, and characteristics.

1-1 Respect for individuals

We do not engage in discrimination against or harassment of individuals based on their nationality, race, skin color, religion, creed, sexual orientation, age, education, family background, place of birth, disability, health problems, social position, or other characteristics.

We respect individual personalities and do not engage in sexual, moral, or any other kind of harassment in the workplace.

1-2 Safe, comfortable, and motivating working environment

We create an efficient and motivating workplace environment and ensure humane working conditions in compliance with applicable laws, regulations, as well as internal and external rules relating to labor, health, and safety, and in consideration of employee safety and health.

We respect the Road Traffic Act and other traffic rules and driving safety.

1-3 Work and evaluation

We perform our work with full understanding of the roles and functions expected of us in consideration of Santen's business objectives and goals, while continuously acquiring and improving specialized knowledge and skills required for the work.

We evaluate work performance and personnel in a fair and appropriate manner based on clearly indicated criteria.

II. Promoting Employee Responsibility and Growth

2. We protect, manage, and effectively utilize Santen's assets, funds and information with full recognition of their value and according to applicable rules.

2-1 Protection of assets

We use Santen's assets such as equipment, machinery, instruments, systems and other supplies solely for our business activities, and take care of these assets in order to prevent their damage, theft or misuse.

2-2 Utilization of funds

We use Santen's funds in the most advantageous ways for our company, always in consideration of cost effectiveness, after obtaining approval for expenditures in accordance with the procedures set forth in Santen's Settlement Regulations.

2-3 Confidentiality

We protect Santen's important information with care and caution, and manage it according to applicable in-house rules.

We use technical and scientific information concerning products, and exclusively held company information such as business and sales plans, profit and other financial data solely in connection with our company's business activities.

We will not publicly disclose, use, or transfer to a third party such information without Santen's permission during our employment with or after resignation or retirement from Santen.

2-4 Respect for third-party confidential information

We respect confidential information of any third party, including other companies and organizations, and do not illegally acquire, use, or publicly display such information.

We do not use or disclose within our company third-party confidential information acquired before joining Santen, while on loan to other companies, or on other occasions.

2-5 Protection of personal information

We protect, use, and manage personal information of health professionals, consumers, patients, shareholders, trade customers, and suppliers, as well as our directors and employees that is necessary for Santen's business activities in compliance with applicable laws as well as external and internal rules.

2-6 Handling of intellectual property

We recognize the importance of intellectual property (IP) rights and strive to protect research and development results by acquiring these IP rights.

We handle inventions by Santen employees in accordance with regulations voluntarily established beforehand.

We do not violate third-party intellectual property rights.

2-7 Accurate recording and reporting

We conduct appropriate reporting, communication, and consultation necessary for Santen's business activities.

We record and report accurate and truthful information on financial, accounting, and other business-related matters.

We fulfill our tax obligations and conduct licensing, reporting, notification, and other formalities due to competent authorities in an appropriate and accurate manner without falsification or misrepresentation.

II. Promoting Employee Responsibility and Growth

3. We promote mutual understanding with our stakeholders, and build and maintain fair, transparent, and free relationships with them that merit society's trust.

3-1 Appropriate treatment

We do not offer or receive in connection with our business activities, money, gifts or entertainment that exceeds the range considered generally acceptable by social norms.

3-2 Prohibition of bribery and corruption

We do not engage in any conduct regarded as bribery or corruption, whether directly or through a third party, that would violate applicable laws and regulations of countries concerned, including those applicable to other countries, such as the UK Bribery Act or the US Foreign Corrupt Practices Act (FCPA).

3-3 Sound relationships with trade partners

We conduct business transactions with our trade partners after sufficient consultation with respect to their positions, rights, and interests, and in compliance with relevant laws, regulations, and in-house rules.

We select and evaluate suppliers based on rational criteria covering such aspects as quality, cost, delivery, service, managerial reliability, and social responsibility.

We do not accept favors from trade partners in exchange for unfair preferential consideration of them.

3-4 Appropriate outsourcing

We outsource consultancy, expert advice, and other services to health professionals and other external specialists by always entering into an agreement with them with a written contract signed and fees proportional to the service provided.

We pay fees for services provided by health professionals in compliance with the applicable laws and regulations of the countries concerned and the pharmaceutical industry's rules, and disclose information on service fees in an appropriate manner.

3-5 Prevention of insider trading

We comply with laws, regulations, and in-house rules relating to insider trading, and refrain from purchasing or selling Santen stock or our trading partners' stock under advantageous conditions based on in-house availability of important information unknown to the general public.

We do not communicate to our families, acquaintances, or friends important information relating to our company that may influence the course of Santen's stock price.

3-6 Avoidance of conflict of interest

We take special care to avoid any conflict of interest between Santen and individual directors or employees who have a spouse, family member or close relative employed by a rival company, trade partner, or trade customer.

III. Maintaining Harmony with Society

1. We protect nature and actively work to preserve the global environment.

1-1 Global environmental protection

We strive to promote the efficient use of resources and energy as well as reduce waste based on the understanding that protecting nature and giving consideration to the global environment are basic corporate social responsibilities.

1-2 Efforts to overcome environmental challenges

We make an active effort to contribute to the conservation of biodiversity and to overcome other national and international environmental challenges.

III. Maintaining Harmony with Society

2. As a responsible corporate citizen, we engage in activities that contribute to society, promote dialogue, and progress in harmony with society.

2-1 Contribution to society

Through our business activities, we contribute to the optimization of people's medical expenses, conservation of medical resources, and advancement of medicine and medical technology. We support research necessary for the development of medicine and pharmacology from a global perspective.

As a responsible corporate citizen, we actively engage in activities that contribute to society, while promoting mutual understanding with local communities and residents.

2-2 Communication with society

We actively disclose information about our business activities and continuously improve communication with stakeholders (customers, consumers, employees, local communities and society, trade partners, shareholders, and investors)

In addition to our business reports and information literature published periodically, we disclose corporate information in an appropriate manner.

2-3 Relationships with antisocial forces and political and governmental bodies

We maintain a resolute attitude toward antisocial forces, which challenge social order and safety and attempt to draw unfair benefit from businesses, and refuse any demands from such entities.

We maintain sound and proper relationships with political and governmental bodies.

2-4 Observance of international rules

In our global activities, we observe international rules and local laws while respecting local cultures and customs, and ensuring that our business activities contribute to local development.

Santen Code of Practice

December 1999	[Establishment]
April 2002	[Revision 1]
September 2003	[Revision 2]
September 2005	[Revision 3]
March 2007	[Revision 4]
August 2010	[Revision 5]
August 2015	[Revision 6]
September 2015	[Revision 7]
March 2016	[Revision 8]
May 2016	[Revision 9]
July 2016	[Revision 10]
November 2022	[Revision 11]
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