

Basic Policy on the Prohibition of Corrupt Practices

1. Objective

Under the Kissei Group Code of Conduct, Kissei Pharmaceutical Co., Ltd. and the individual companies of the Kissei Group strive to foster a corporate culture of sincerity and integrity, comply with laws, regulations, and social norms, and conduct business activities with the aim of contributing to the welfare of all customers and stakeholders.

In the belief that fair trade and healthy competition are the foundation of our business, the Kissei Group recognizes that the elimination of the corrupt practices described below, including bribery, is a key management issue and hereby establishes this Policy.

- 1) Acts of bribery, etc. of public officials or quasi-public officials, etc. that are prohibited by the Penal Code (crime of offering bribes) and the Unfair Competition Prevention Act (prohibition against the provision of wrongful gains to foreign public officials) of Japan, the Foreign Corrupt Practices Act of the United States, the Bribery Act 2010 of the United Kingdom, the Improper Solicitation and Graft Act (Kim Young-ran Act) of South Korea, the anti-corruption law and the law against unfair competition of China, and other anti-corruption laws and regulations in the countries and regions where the Kissei Group conducts its business
- 2) Acts of commercial bribery, etc. that are prohibited by the Bribery Act 2010 of the United Kingdom, the law against unfair competition of China, and other laws and regulations in the countries and regions where the Kissei Group conducts its business
- 3) Acts of directly or indirectly facilitating organized crime groups, terrorists, or any other anti-social forces that are prohibited under the Act on Punishment of Organized Crimes and Control of Proceeds of Crime, prefectural ordinances on the elimination of organized crime groups, the Act on Prevention of Transfer of Criminal Proceeds, and the Foreign Exchange and Foreign Trade Act (security trade legislation) of Japan, and similar foreign laws and regulations
- 4) Any wrongful acts equivalent to those listed above and any acts suspected of being such wrongful acts

2. Prohibition of Corrupt Practices

The Kissei Group prohibits all its officers and employees from engaging in acts of corruption as stipulated in this Policy in all its business activities.

All officers and employees of the Kissei Group prohibit or strive to prohibit corrupt practices as defined in this Policy in all its business activities with all business partners, agents, advisors, etc. who are engaged in the business of individual Kissei Group companies or that are in direct relevant contractual relationships with those companies.

All officers and employees of the Kissei Group are responsible for complying with this Policy in the performance of their respective duties.

3. Implementation of this Policy

The Kissei Group establishes appropriate frameworks for the implementation and observance of this Policy at each Group company in accordance with the nature and scale of its business and the degree of risk involved. The Kissei Group appoints a responsible officer at Kissei Pharmaceutical Co., Ltd for the operation and management of anti-corruption activities within the Group.

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Mutsuo Kanzawa
Chairman and CEO
Kissei Pharmaceutical Co., Ltd.
Representative of Kissei Group