

Sumitomo Pharma Sustainable Code of Conduct for Business Partners

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Sumitomo Pharma Co., Ltd.

Introduction

To our business partners (request for sustainability initiatives)

Sumitomo Pharma Group has put forth "Mission" of "To broadly contribute to society through value creation based on innovative research and development activities for the betterment of healthcare and fuller lives of people worldwide." We define "Sustainability management" as the practice of its Mission that contributes to the realization of a sustainable society and leads to the sustained enhancement of its corporate value. In addition, we have set "Declaration of Conduct" as the code of conduct to be observed by all executives and employees of Sumitomo Pharma Group in daily work. In the "Declaration of Conduct," we have declared that we comply with laws and regulations and conduct transparent and fair corporate activities with a good sense of ethics. In order to ensure the practice of compliance in this Declaration, Sumitomo Pharma has established the "Compliance Standards" and set it as a concrete code of conduct in our business activities.

Sumitomo Pharma believes that business partners are important partners for us and that it is only possible to promote sustainability in the entire value chain with the understanding and cooperation of our business partners. Based on the above "Declaration of Conduct" and "Compliance Standards", we have compiled five priority categories that we expect our business partners to work on from the perspective of sustainability in this Code of Conduct. We expect our business partners to comply with this Code of Conduct and we promote collaboration with business partners who adopt and apply this Code of Conduct.

1. Ethics

We request Business Partners to comply with laws and regulations, conduct transparent and fair corporate activities with a good sense of ethics.

1.1 Prohibition of Bribery and Corruption

We request Business Partners not to engage in corruption such as bribery. We request Business Partners not to provide, request or promise any unfair profits (money, goods, entertainment, benefits, etc.) in violation of applicable domestic and foreign anti-corruption laws and regulations. We request Business Partners to make their relationships with their business partners fair and sound, and not to illegally or unreasonably provide profits, or make requests or promises regarding their professional status or authority.

1.2 Prohibition of Unfair Trading

We request Business Partners to comply with all applicable anti-trust laws and conduct fair, legitimate and transparent corporate activities. We request Business Partners to comply with relevant laws and regulations and ensure fairness with accurate and sincere content and expressions without falsehood or exaggeration to carry out advertising and publicity activities.

1.3 Animal Welfare

We request Business Partners to try to reduce pain and stress as much as possible for animals. We request Business Partners to consider alternatives that do not use animals, reduce the number of animals used, and reduce pain, before animal testing. We request Business Partners to adopt alternatives, whenever scientifically valid and acceptable to regulators.

1.4 Information Management (Personal Information, Confidential Information, etc.)

We request Business Partners to comply with applicable privacy and data protection laws, handle confidential and personal information properly, protect the privacy rights of worker, patient, subject and donor of human samples, and ensure information security.

1.5 Management of Conflicts of Interest

We request Business Partners to avoid situations where the interests of the company may conflict with the personal interests of officers and employees, and take appropriate measures to avoid improperly prioritizing personal interests.

2. Respect for Human Rights and Labour

We request Business Partners to respect the human rights of their employees and treat them with dignity and respect.

2.1 Prohibition of Forced Labor and Child Labor

We request Business Partners not to use forced and bonded labor. Also, we request Business Partners not to employ any children under the minimum legal age for employment stipulated in local laws and regulations.

2.2 Non-Discrimination

We request Business Partners not to discriminate or engage in harassment based on race, nationality, ethnic or social origin, ancestry, ethnicity, age, religion, faith or belief, sex and gender, sexual orientation, gender identity, marital status, academic background, disability, disease, employment status, or any other status. We request Business Partners not to discriminate during the process of job hiring and employment.

2.3 Fair Treatment

We request Business Partners not to provide a workplace where they undermine the dignity of an individual by any form of harassment, including sexual harassment or workplace bullying, and inhumane treatment.

2.4 Wages and Working Hours

We request Business Partners to pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. We request Business Partner to communicate with their employees in a timely manner regarding compensation standards, the need for overtime and the wages to be paid for overtime.

2.5 Freedom of Association

We request Business Partners to respect the worker's right to organize, as set forth in local laws, as a means of realizing communication between labor and management regarding the working environment and compensation. We request Business Partners to respect the freedom to associate, to join a trade union, and to participate in a workers' council, without harassment, based on local law.

2.6 Respect for Indigenous Peoples' Lives and Communities

We request Business Partners to respect the unique culture and heritage and respect the rights of indigenous peoples when doing business in an indigenous area. We request Business Partners to consider not only ethnic issues but also adverse impacts on local

communities.

3. Safety and Health

We request Business Partners to provide a safe and healthy working environment, including - where applicable - for any company-provided living quarters.

3.1 Safety and Health Authorizations and Permits

We request Business Partners to be sure to comply with all applicable safety and health laws, regulations and standards, comply with the required permits, licenses, information registrations and restrictions, and report to the government as required.

3.2 Worker Protection

We request Business Partners to prevent occupational accidents and health problems of workers in the workplace and in any company-provided living quarters.

We request Business Partners to protect workers from risks (danger and harmfulness) caused by construction, equipment, raw materials, dust, chemical substances (including pharmaceutical compounds and pharmaceutical intermediates), as well as manufacturing processes and other work, through engineering measures, procedure maintenance, education and training.

We request Business Partners to strive to maintain and improve the mental and physical health of workers.

Also, we request Business Partners to provide workers with access to potable water.

3.3 Emergency Preparedness and Response

We request Business Partners to assume emergencies (serious occupational accidents, leakage of chemical substances and biohazard, accidents such as fires, explosions, etc.) in the workplace and any company-provided living quarters, prepare emergency countermeasures, and inform workers of the countermeasures through the education and training.

4. Environment

We request Business Partners to conduct environmentally friendly business activities and minimize adverse impacts on the environment. We encourage Business Partners to save resources, avoid the use of harmful substances as much as possible, and reuse and recycle.

4.1 Environmental Authorizations and Permits

We request Business Partners to be sure to comply with all applicable environmental laws, regulations and standards, comply with the required permits, licenses, information registrations and restrictions, and report to the government as required.

4.2 Waste and Emissions

We request Business Partners to have systems and procedures to manage the safe handling, movement and storage of waste, wastewater discharge and air emissions, and the recycling and reuse of waste. We request Business Partners to appropriately manage and treat any waste, wastewater discharge and air emissions that may have an adversely impact on humans or the environment, prior to release into environment.

Also, we request relevant Business Partners to apply the appropriate management and treatment to environmental emission of wastes and wastewater discharge in the manufacture of antibacterial agents in the term of reducing the risk of AMR (antimicrobial resistance).

4.3 Environmental Efficiency

We request Business Partners to strive to save energy and resources (waste, water, etc.) to reduce their consumption as much as possible. Also, we request Business Partners to strive to set voluntary targets for greenhouse gas reduction and promote reduction measures.

4.4 Spills and Releases

We request Business Partners to have systems in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.

4.5 Sustainable Sourcing and Traceability

We request Business Partners to ensuring traceability of sources of raw materials and rare resources that are important in terms of environmental consideration for promotion of sustainable resource procurement and conserving biodiversity, and promote legal and sustainable procurement.

5. Management Systems

We request Business Partners to use management systems to ensure compliance with the expectations of this Code of Conduct and continuous improvement.

5.1 Commitment and Accountability

We request Business Partners to identify the responsible department and personnel and demonstrate commitment to the concepts described in this Code of Conduct.

5.2 Legal and Customer Requirements

We request Business Partners to identify and comply with applicable laws, regulations, standards and relevant customer agreements.

5.3 Risk Management

We request Business Partners to identify the risks in the categories addressed by this Code of Conduct, strive to prevent them from occurring, and establish a system to take appropriate measures when they occur.

5.4 Documentation

We request Business Partners to maintain documentation to confirm compliance with applicable regulations and this Code of Conduct.

5.5 Training and Competency

We request Business Partners to conduct education and training so that management and workers acquire enough knowledge, skills and abilities to work on what is expected in this Code of Conduct.

5.6 Continual Improvement

We request Business Partners to continue to improve through the setting and progress management of goals, evaluation from inside and outside the company, audits, and necessary corrective actions for deficiencies identified by management reviews.

5.7 Identification of Concerns

We request Business Partners to establish a reporting and consultation system where any concerns in the workplace, illegal activities or deviations from this Code of Conduct can be reported without retaliation or harassment, and take appropriate corrective actions.

5.8 Communication

We request Business Partners to have effective systems to communicate this Code of Conduct to workers, contractors and suppliers.