

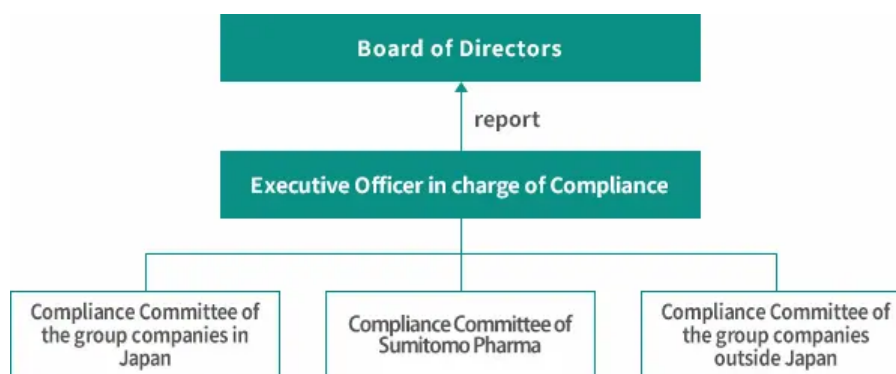
# Compliance | FY2023 Archive

## Declaration of Conduct and Compliance Standards

Sumitomo Pharma has declared in our publicly announced Declaration of Conduct our commitment to "abide by relevant laws and regulations, and conduct our business in a transparent and fair manner with the highest level of ethics." To put this declaration into practice and ensure full compliance, we have established our Compliance Standards, based on which we conduct our business.

## Framework for compliance implementation

Sumitomo Pharma has in place the organizational framework shown below for full implementation of compliance by every company of the Sumitomo Pharma Group.



One of Sumitomo Pharma's executive officers is charged with overseeing all compliance matters of Sumitomo Pharma and its group companies around the world.

We have set up three compliance committees, the Compliance Committee of Sumitomo Pharma, the Compliance Committee of the group companies in Japan and the Compliance Committee of the group companies outside Japan. The Sumitomo Pharma executive officer in charge of compliance serves as chair of each of the three committees and reports to the Board of Directors on the committee activities.

The Compliance Committee of Sumitomo Pharma deliberates on any revisions of the Compliance Standards, discusses compliance education and training programs and verifies their implementation, and reviews compliance implementation. The Compliance Committees of the group companies in and outside Japan each shares information and discusses compliance matters such as compliance policies, programs and activities.

## | Compliance Hotline

Sumitomo Pharma has set up internal and external compliance hotlines through which its officers and employees can make reports and consultations relating to incidents of real or threatened corruption, human rights issues (including harassment, etc.), and other acts of compliance violation. Similar compliance hotlines have been installed in the group companies in and outside Japan. The officers and employees of such group companies may use the Sumitomo Pharma hotlines. In addition, anonymous reports are also accepted and responded to.

Our compliance hotline is also available to our business partners, the officers and employees of our subsidiaries, and others who have served in the past. Those involved in the operation of the compliance hotline will protect the confidentiality of the reporter/ consulter. The company prohibits to treat persons disadvantageously who have reported or consulted such matters on the basis that they made such reports or consultation, and the people are protected from treating persons disadvantageously by the officers and employees of the company and its subsidiaries.

Business partners should contact the compliance hotline when they obtain information about our compliance violations or potential actions.

In advance, it should be noted that it is not possible to receive consultations and reports that describe slander against individuals, and reports and consultations that are considered not related to compliance.

In case of using the compliance hotline, please click [here](#). (Common ID: smphotline/Common Password: smphotline)

## | Compliance education and training

Sumitomo Pharma provides all its employees with annual compliance educations and training on a number of topics that include corruption, insider trading, the harmful effects of drugs, and harassment. We also conduct grade-specific education and training programs for new employees and managers (Vice Presidents and Senior Directors). A booklet about the Compliance Standards is used in compliance workshops held at the workplace level. Additionally, we require our group companies in and outside Japan to provide similar compliance education and training programs.

## | Future compliance initiatives

Sumitomo Pharma recognizes that the implementation of compliance is a major prerequisite for the continued existence of companies. We will continue to provide our officers and employees with necessary education and training to ensure that their decisions and conduct are in full compliance with relevant laws and regulations as well as our own internal rules, and are consistent with the social responsibilities and corporate ethics. Also, we will continue to improve our compliance implementation regime.

### Related information

[Compliance Standard \(PDF 299KB\)](#) 

