



Compliance Handbook

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About This Handbook

This handbook is provided to all JCR executives and employees of JCR Pharmaceuticals Co., Ltd. and its group companies (“Company” or “JCR”) for use in conducting our business in Japan and worldwide. Each and every one of us is requested to understand the content of this handbook and put it into practice daily. When compliance-related problems arise in a workplace, they should be resolved at the workplace in principle. However, when you feel it difficult to consult or speak up at your workplace, you are encouraged to consult with the hotline desk rather than remaining alone and silent. The hotline desk shall handle all cases in a manner that strictly respects the confidentiality of each individual.

I. Statement

Corporate Philosophy

Contributing towards human healthcare through pharmaceutical products.

Core Values

Reliability

We strive to establish a reliable company for all stakeholders by actions with high sense of duty in addition to compliance.

Confidence

We take a unique approach in advancing our research and development and provide high-quality products and information with confidence in the aim of providing world-class pharmaceuticals.

Belief

We aim for further corporate growth in the belief of "Think by oneself, Act by oneself" under the basic philosophy.

Importance of Compliance

JCR's mission is to deliver therapeutic drugs to patients worldwide suffer from a variety of diseases through the development of proprietary technologies and creation of innovative products. Motivated by these challenges, we must continue our business activities for the sake of patients waiting for therapeutic drugs.

We define compliance as: "All of the Company's executives and employees acting in accordance with laws and regulations (including rules, guidelines, voluntary industry standards, JCR's corporate philosophy and internal rules, etc.) with an ethical spirit for the Company to fulfill its social mission, meet the demands of society, realize sound, sincere management, and achieve sustainable development."

Let us strive to develop and maintain a corporate culture that fosters a high sense of ethics and a sound, high-quality enterprise system and to fulfill our social responsibilities by properly restraining ourselves and our organization, and seeking for continued improvements and growth day by day.

What is most important in promoting compliance?

It is most important not to turn a blind eye when you encounter situations where you have doubts about compliance related issues. In recent years, the media has reported a series of corporate scandals showing that **a single violation of compliance could threaten the continued existence of our Company.** We will neither hide our problems, nor try to turn them into a personal responsibility, but shall work together to resolve them. While there is a tendency to forget about such doubts in the course of our busy daily operations, we should constantly review what we are doing, what we have done, and what we are trying to do in the future from the perspective of "creating a sincere team at JCR." By resolving problem whenever they arise, we shall realize our vision for the Company. This Compliance Handbook will serve as our compass for this purpose.

II. Top Message

Message from CEO



What do you think about compliance? Do you have a strong awareness that even in your daily life, as a member of JCR engaged in life-related businesses, there are rules that you must observe as members of society? Based on our Corporate Philosophy of "contributing towards people's healthcare through pharmaceutical products," our mission is to continuously devote our energetic efforts to research and development for patients awaiting therapeutic drugs and maintain a high level of quality for drugs developed over a long period of time, produce drugs in a specified manner, and deliver them without fail to patients who need them. In all of these processes, no compromise can be tolerated, and we must conduct our business in accordance with extremely high ethical standards, laws and regulations applicable to pharmaceuticals, regenerative medicine products and medical devices, corporate ethics, and corporate regulations. For this reason, it is very important for all employees to understand this. In particular, managers should always consider how to avoid problems and how to deal with them when they arise. Our business depends on the trust of patients and society. If you have any questions or doubts in your daily work, go back to the "Corporate Philosophy" and "The Standard for JCR Compliance Behavior." To ensure that we remain a company that will continue to be trusted and grow sustainably in the future, please read this Compliance Handbook carefully so that you can fully understand and act correctly, by understanding not only its text but also its purpose.

April 2022

Shin Ashida

Representative Director, Chairman, President and CEO

A handwritten signature in black ink, appearing to read "S. Ashida", written over a horizontal line.

Message from Chief Compliance Officer (CCO)



I believe that all employees are fully aware of the importance of compliance. One of JCR's management policies is "Management Following Laws and Internal Rules based on Social Commonsense". Although compliance is a simple word and easy to understand at first glance, it is not easy to actually understand and follow it while conducting business. The laws, regulations, and guidelines that pertain to our business cover a wide range of areas, and are revised and becoming complicated every year. Furthermore, while in the past it was sufficient to be aware only of domestic laws and regulations, the scope of compliance that must be covered is now extending to global (multi-regional and multi-lingual) as it literally shows, with globalization of our business. It is no longer sufficient to just keep compliance in the back of our mind as we go about our work; we must constantly check relevant laws, guidelines, and SOPs.

In FY2021, a number of compliance issues by pharmaceutical companies were reported. Some of them resulted in a transfer of business license to 3rd party or a long-term suspension of manufacturing/marketing. In many cases, third-party committee reports were disclosed to the public. After reading them, I strongly feel that there were few cases of fraud based on pure malicious intent, and that many of the fraudulent procedures and decisions were made out of a desire to avoid shortage of products or inconveniencing patients in the clinical practices. For a moment, it may seem "understandable," but the measures taken are serious and not excusable, such as ignoring procedures and double recording, which may invalidate the company's quality system itself.

What I would like to ask you all to do to prevent such incidents from occurring in JCR is to "cultivate a workplace culture in which it is easy to ask for advice". I would like to ask you to create a highly transparent workplace culture in which people can voice their opinions, such as "This sounds strange," "Should it be like this?", or "This must be wrong," and their superiors can take such opinions seriously and discuss them. In such an environment, I hope that each of you will carefully read the regulations and SOPs and promote highly law-abiding business operations. Let's work together to open up the future.

April 2022

Yoshio Hiyama

Senior Executive Director and CCO

A handwritten signature in black ink that reads "Y. Hiyama". The signature is written in a cursive, flowing style.

III. JCR Compliance Policy

1. Human Rights and Workplace Environment

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| 1 | Respect for Human Rights | We always protect the human rights of every person involved in our business activities and respect the dignity and worth of each individual. |
| 2 | Prohibition of Harassment | We do not tolerate acts of harassment in any form (including sexual harassment, harassment associated with pregnancy, childbirth and childcare, elderly care and the like, and workplace bullying). |
| 3 | Equal Employment Opportunities | We hire and evaluate our employees fairly based on their ability, aptitude and motivation. We do not tolerate any form of discrimination on the grounds of ethnicity, origin, gender, etc. |
| 4 | Health and Safety of Workplaces | We comply with laws and regulations related to occupational health and safety, as we strive to maintain and improve our workplace environments so our employees can work safely and even more comfortably and productively. |
| 5 | Safety and Disaster Readiness | We will implement various measures to prevent accidents such as fires. If there is a disaster, we will act rapidly and effectively to stop the spread of the disaster in accordance with operating procedures and manuals on disaster mitigation measures established for each business site. |

2. Responsibility to Society and Stakeholders

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| 6 | Disclosure of Corporate Information | We provide timely and accurate disclosure of corporate information on matters such as management policies and the status of business activities in accordance with relevant laws and regulations. In addition, we listen closely to the requests and opinions we receive from society and reflect such feedback in our business activities. |
| 7 | Tax Payments | We comply with tax laws and regulations applicable in the countries where we operate and pay taxes appropriately. |
| 8 | Response to Criminal Organizations | We never have relationships with criminal organizations or groups and resolutely stand up to such entities. |
| 9 | Prohibition of Conflicts of Interest | We never use our positions in the Company or any information obtained in the course of our duties for personal gain or commit any acts conflicting with the interests of the Company. |
| 10 | Contributing to Society | We remain aware of our role as a good corporate citizen as we seek to realize a sustainable society. With this in mind, we actively interact with society and conduct activities that contribute to society. |
| 11 | Conserving the Environment | We always remain mindful of how we impact the global environment and local communities as we conduct our business activities, contribute to the sustainable development of society, and fulfill our responsibilities to future generations. |

3. Fair Trading and Competition

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| 12 | Commitment to Fair Trading and Competition | We conduct fair and legitimate corporate activities in compliance with laws and regulations for maintaining competition and fair trading in the market. |
| 13 | Prohibition of Unfair Competition | We do not engage in the unauthorized acquisition or use of the trade secrets of other companies or act in a manner which would impair the business reputation of other companies. |
| 14 | Entertainment and Gifts | We maintain sound and fair relationships with our suppliers and other business partners, without providing or receiving entertainment or gifts in excess of accepted social norms and comply with relevant laws and regulations. |
| 15 | Prohibition of Corruption and Bribery | We are aware that we are subject to regulations stipulated by public organizations and are required to establish proper relationships with public organizations. |

4. Business Activities

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| 16 | Drug Discovery Research | We actively pursue research activities in accordance with relevant laws, regulations, and internal rules aiming to eradicate diseases, improve the quality of human health and daily lives, and contribute to the future of healthcare. |
| 17 | Export and Import | We implement appropriate export and import procedures in compliance with export- and import-related laws, regulations, international treaties, and other arrangements. |
| 18 | Clinical Development | In course of conducting clinical trials, we respect the human rights of clinical trial subjects and secure their safety, along with ensuring the quality and reliability of data, in accordance with relevant laws, regulations, and internal rules. |
| 19 | Product Quality | Our top priority is to steadily supply high-quality products with an emphasis on efficacy and safety to patients around the world. We provide a timely and appropriate supply of products in accordance with relevant laws, regulations, and internal rules. |
| 20 | Management of Information Related to Product Efficacy, Safety, and Quality | We provide timely and accurate information related to product efficacy, safety, and quality in accordance with relevant laws, regulations, and internal rules with the aim of ensuring proper use of the products manufactured and sold by the Company. |
| 21 | Promotion Activities | When providing medical or pharmaceutical information to healthcare professionals, we provide, gather, and communicate accurate information based on solid medical and pharmaceutical evidence in accordance with relevant laws, regulations, our industry's Code of Practice, and internal rules. |
| 22 | Evaluation of Business Partners | We are required to appropriately evaluate suppliers and other third parties with whom we trade. |

5. Information Management

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| 23 | Respect for Intellectual Property | Recognizing that intellectual property is an important asset of the Company, we take appropriate steps to protect our intellectual property. In addition, we respect the intellectual property rights of others and will not engage in infringement or unauthorized usage. |
| 24 | Handling of Confidential Information | We recognize that confidential information, such as non-public information, know-how and customer information, is an important asset of the Company. Therefore, we use and control such confidential information appropriately in accordance with relevant laws, regulations, and internal rules. |
| 25 | Use of Communication Channels | We take responsibility for the outcome and impact on social reputation arising from the use of communication channels, including social media, regardless of whether it is for business or personal use. |
| 26 | Prohibition of Insider Trading | We do not commit acts that violate insider trading regulations or acts that could be suspected of violating such regulations. |
| 27 | Handling of Personal Information | To protect the interests of individuals, we appropriately handle the personal information of customers, patients, clinical trial subjects, donors of human cells, tissue and other biological samples, shareholders, and employees in accordance with relevant laws, regulations, and internal rules. |

1

Respect for Human Rights

We always protect the human rights of every person involved in our business activities and respect the dignity and worth of each individual.

We respect the human rights of all people who come into contact with us through our work and do not behave in any way that would harm the dignity of individuals. We strictly refrain from behavior that would disrespect others and will not tolerate any acts of harassment. We treat others with respect as colleagues working together.

- In order to realize a fair and sound workplace free from discrimination, we strive to understand various human rights issues (ethnicity, nationality, gender discrimination, etc.) and respect diversity.
- We make every effort to improve mutual communication, respect each other's fundamental rights and recognize individual differences and personalities.
- We take appropriate corrective measures when we recognize that human rights have been infringed.

2

Prohibition of Harassment

We do not tolerate acts of harassment in any form (including sexual harassment, harassment associated with pregnancy, childbirth and childcare, elderly care and the like, and workplace bullying).

We strive to create a workplace environment free from harassment, where everything can be discussed openly.

We do not commit acts of harassment. If you see any incident that would negatively affect the workplace environment or improperly interfere with business operations, you should report it to your supervisor or to the internal reporting office with the assurance that your reporting will remain confidential.

- We do not tolerate any actions which disrespects the dignity of others, intimidating or aggressive remarks or behavior, or sexual harassment in the workplace or in extended places of business, such as outings, banquets, etc.
- We regard each of our colleagues as business partners, always consider things from the other's point of view, and try to eliminate communication gaps between colleagues.

3

Equal Employment Opportunities

We hire and evaluate our employees fairly based on their ability, aptitude and motivation. We do not tolerate any form of discrimination on the grounds of ethnicity, origin, gender, etc.

We maintain fairness and impartiality in hiring, evaluating and training our employees based on their ability and aptitude for their duties, as well as their performance and motivation.

- We encourage our employees to exercise their rights to maternity or paternity leave, childcare leave and elderly care leave for their precious family members. We do not treat employees exercising such rights unfairly with respect to personnel evaluations or promotions.
- Our hiring and personnel evaluations are based on the ability, aptitude and motivation of applicants and employees. We do not discriminate against applicants or employees in hiring and personnel evaluation for the reasons below:
 - Matters for which individuals are not personally responsible (birth and family related matters, etc.), and
 - Matters of personal freedom (religion, ideology, belief, etc.).

4

Health and Safety of Workplaces

We comply with laws and regulations related to occupational health and safety, as we strive to maintain and improve our workplace environment so our employees can work safely and comfortably.

We strive to create a comfortable work environment that eliminates occupational accidents and enables employees to work in a safe and healthy manner. We comply with laws and regulations related to workplace safety and health and promote occupational health and safety management systems to prevent occupational accidents. In addition, every one of us endeavors to maintain a high level of awareness for occupational safety and health, always striving to conduct our work in good mental and physical health. If you feel unease, irritation, or job-related stress, please consult with your supervisor or an internal specialist or counselor.

- Each employee strives to maintain a good work environment, to ensure thorough implementation of safety activities, and to identify and improve problems. If you become injured in the course of performing your duties, you should report even a minor injury to your supervisor and relevant personnel in charge of occupational safety and health.
- We comply with local laws and regulations regarding occupational health checks, if any.
- You should make efforts to promote your health by consciously taking exercise and refreshing yourself.

5

Safety and Disaster Readiness

We will implement various measures to prevent accidents such as fires. If there is a disaster, we will act rapidly and effectively to stop the spread of the disaster in accordance with operating procedures and manuals on disaster mitigation measures established for each business site.

Fires, chemical leaks, and other serious disasters not only have a significant impact on business operations, but can also cause anxiety, harm, and health damage to nearby residents and impact the community. Above all, it is important to prevent such disasters from occurring. In addition to complying with relevant laws and regulations, we conduct education and training in accordance with internal operating procedures and disaster response manuals.

- We strictly comply with laws and regulations related to safety and disaster prevention.
- When introducing new equipment or using new chemical substances, we evaluate them from the viewpoint of safety and disaster prevention and take appropriate measures to prevent accidents and disasters.
- In the event of an accident or a large-scale natural disaster at any of our business sites, we will mobilize all our resources to prevent the damage from spreading and promptly contact and report matters to the relevant authorities. In addition, employees are required to report the status of their safety using the established safety confirmation system.

6

Disclosure of Corporate Information

We provide timely and accurate disclosure of corporate information on matters such as management policies and the status of business activities in accordance with relevant laws and regulations. In addition, we listen closely to the requests and opinions we receive from society and reflect such feedback in our business activities.

We provide appropriate explanations of our activities to all stakeholders. Above all, as a listed company, we disclose information required for investor decisions promptly, accurately, and fairly in accordance with applicable laws, regulations and the rules of the securities market. In the event that a benefit to the public or a need for urgency is recognized, we will proactively disclose relevant information on our own initiative to fulfill our corporate social responsibilities.

- We disclose information appropriately in accordance with relevant laws and regulations. We also emphasize our relationship with society and strive to voluntarily disclose information expected by society.
- To ensure accurate data collection, which serves as the basis for information disclosure, we conduct business reporting and accounting processes accurately based on the actual facts.
- We take requests and opinions from outside the Company seriously and strive to reflect them in our corporate activities.

7

Tax Payments

We comply with tax laws and regulations applicable in the countries where we operate and pay taxes appropriately.

We comply with applicable tax laws and regulations, file tax returns and pay taxes appropriately in the countries where we engage in business activities. By meeting these obligations, we fulfill our important corporate social responsibilities to contribute to the economic development of the countries where we operate.

- We do not implement tax planning, utilize tax havens, or engage in the transactions via tax havens for tax evasion purposes.
- We conduct our intragroup transactions appropriately in accordance with the Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (the OECD Transfer Pricing Guidelines) and other applicable local transfer pricing taxation laws and regulations.
- We disclose information appropriately in accordance with relevant laws and regulations to ensure the transparency and reliability of tax reporting to the tax authorities of each jurisdiction.
- When uncertain tax situations arise, we will consult with tax authorities in advance as necessary, and strive to resolve such uncertain tax matters.

8

Response to Criminal Organizations

We never have relationships with criminal organizations or groups and resolutely stand up to such entities.

We have taken a resolute stance of "having no relationship at all" with any criminal organizations that pose a threat to the order and safety of society. We shall not deal with any criminal organizations, nor provide money or other benefits to any criminal organizations, even when faced with acts of extortion, coercion, or harassment by them.

- We shall not provide any benefit to criminal organizations for any reason, based on the three "No" principles of "no fear," "no money," and "no use."
- We do not provide direct benefits such as money or goods to criminal organizations, engage in money laundering or provide any indirect benefits aiding the activities of criminal organizations.
- In the event of an improper request from criminal organizations or contact from a suspicious organization, you should report it to your supervisor and act in cooperation with the related departments, and not make any judgment or try to respond on your own..

9

Prohibition of Conflicts of Interest

We never use our positions in the Company or any information obtained in the course of our duties for personal gain or commit any acts conflicting with the interests of the Company.

We strictly distinguish between our professional duties in the Company and our private activities and will not use the Company's assets for private gain or engage in any conduct that conflicts with the interests of the Company. We do not abuse our positions in the Company or use for personal purposes any property entrusted to us or any information obtained in the course of our duties. We properly use and manage the Company's assets, whether tangible or intangible, and do not use them for personal purposes.

- We do not use any information obtained in the course of our duties in the Company for private gains or for the benefit of any third party.
- We do not engage in transactions that compete with the Company's business, or commit any acts that compete with the Company, such as becoming an executive or major investor of a competing enterprise.
- If you or your related party (such as a relative, or a company or organization managed by you or your relative) have any dealings with the Company, you will not use your position in the Company to gain any benefit for yourself or your related party, and will not engage in any acts that may harm the interests of the Company.
- We do not provide improper benefits to specific suppliers or customers (such as conducting business on terms that deviate from reasonable limits for the Company) or receive improper benefits (such as receiving money from a supplier or customer).
- We properly use and manage the Company's assets, whether tangible or intangible, and do not use them for any purpose other than business, and do not appropriate them for private purposes. We do not improperly use the Company's IT systems or use the Company's properties or business expenses for private purposes.

10

Contributing to Society

We remain aware of our role as a good corporate citizen as we seek to realize a sustainable society. With this in mind, we actively interact with society and conduct activities that contribute to society.

We aim to contribute to human health through sustainable development, and as a corporate citizen, we actively interact with local communities and engage in activities that contribute to society. We support a variety of activities, making the most of our unique characteristics as a company involved in an industry that supports human life.

- We conduct sustainable activities that help solve social problems and contribute to the development of local communities where our businesses are located.
- We collect and disseminate information inside and outside the Company to deepen the understanding of rare diseases, and promote cooperation and support activities with patient associations and rare disease support organizations.
- In collaborating with patient groups, we maintain high ethical standards, transparency and respect for the independence of each group.

11

Conserving the Environment

We always remain mindful of how we impact the global environment and local communities as we conduct our business activities, contribute to the sustainable development of society, and fulfill our responsibilities to future generations.

We use genetically-modified organisms and various other materials, which may have a significant impact on our environment in case of accident or other incident. To preserve our environment, we proactively cooperate with various measures and initiatives while understanding the importance of environmental issues as well as complying with environmental laws and regulations in our sustainable corporate activities.

- We comply with all laws, regulations, ordinances, and agreements related to conservation of our environment, including biodiversity.
- We establish proper metrics related to environmental conservation, measure progress accurately, and report the results appropriately.
- To promote environmental conservation activities, we work seriously at every stage of our business activities to save resources, conserve energy, reduce waste, recycle, properly manage chemical substances, and create environmentally-friendly products with the aim of reducing environmental impact.

12

Commitment to Fair Trading and Competition

We conduct fair and legitimate corporate activities in compliance with laws and regulations for maintaining competition and fair trading in the market.

Restricting free corporate activities and competition, and business transactions using unfair means are strictly prohibited by the relevant regulations of each jurisdiction. In the event of a violation, serious penalties are imposed on not only the Company but also the person in charge. We engage in fair and free competition in the market and do not commit any violations, such as cartels, bid rigging, restrictions on resale prices or purchasers, exclusion of certain business operators, abuse of a dominant bargaining position, or unfair discriminatory treatment.

- We do not use unfair means to exclude competitors in order to monopolize the market.
- We do not restrict competition by agreeing with our competitors on prices, production volumes, sales volumes, sales territories, or customers (including agreements with industry associations).
- We do not engage in contact with our competitors or exchange information or opinions within industry associations in a manner which would raise suspicion of involvement in a cartel.
- We do not restrict customers and the sales prices of our distributors, or unjustly restrict their sales activities.
- We deal with subcontractors by expressly specifying in writing the appropriate terms and conditions of business and do not delay payments, request unreasonable discounts, or refuse receipts of goods or services.

13

Prohibition of Unfair Competition

We do not engage in the unauthorized acquisition or use of the trade secrets of other companies or act in a manner which would impair the business reputation of other companies.

We do not illegally acquire or use trade secrets belonging to other companies. In addition, we do not slander or defame other companies in any way that may harm their reputations. Any act or conduct of unfair competition is prohibited by relevant laws and regulations applicable to each jurisdiction, and we recognize the potential liability and criminal penalties related to such violations.

- We do not acquire the trade secrets of other companies through improper means or use the trade secrets of other companies that may have been acquired through improper means. In addition, we do not request the fraudulent provision of trade secrets belonging to other companies.
- We do not harm the reputation of other companies by slandering or defaming their products or disseminating false information about them.

14

Entertainment and Gifts

We maintain sound and fair relationships with our suppliers and other business partners, without providing or receiving entertainment or gifts in excess of accepted social norms and comply with relevant laws and regulations.

We will maintain moderation and transparency in entertaining and giving gifts to ensure they are only for social courtesy. When providing entertainment or gifts, such conduct should be within the bounds of socially accepted standards, and we do not provide excessive entertainment or gifts which might impair our business judgments, nor accept such excessive entertainment or gifts.

- We comply with local laws and regulations regarding entertainment-related activities for healthcare professionals. We do not provide inappropriate gifts, money, meals, or drinks, etc. in accordance with our industry's Code of Practice and other local rules.
- We do not provide inappropriate gifts, money, meals, or drinks, etc. to our private-sector stakeholders and we comply with applicable local laws and regulations, our industry's Code of Practice and other local rules.

15

Prohibition of Corruption and Bribery

We are aware that we are subject to regulations stipulated by public organizations and are required to maintain proper relationships with public organizations.

Our businesses are subject to regulations stipulated by public organizations worldwide. We are required to maintain proper relationships with public organizations. We are aware that any act of corruption and bribery can ruin our corporate trust overnight and we should therefore never permit such acts.

- We comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, the Brazilian Anti-Corruption Act and other similar laws, as well as our policies and regulations on anti-corruption.
- We understand the objectives of relevant local regulations and do not provide any inappropriate gifts, money, meals or drinks, etc. to public officials (including persons deemed as public officials by specific legislation).
- We do not make any improper payments to any political parties, politicians, or political organizations, etc.

16

Drug Discovery Research

We actively pursue research activities in accordance with relevant laws, regulations, and internal rules aiming to eradicate diseases, improve the quality of human health and daily lives, and contribute to the future of healthcare.

We engage in research and development of pharmaceuticals and other products that contribute to the advancement of people's health and medical care. In conducting experiments and tests, it is fundamental to collect reproducible and accurate data in compliance with relevant laws, regulations, industry rules, and internal rules. We will never tolerate unauthorized discarding of or tampering with data.

- We conduct research and testing in compliance with relevant laws, regulations and internal rules, and collect accurate data to appropriately judge efficacy and safety.
- When conducting animal testing, we follow the 3R principles (Replacement: Use of alternative methods; Reduction: Reducing the number of animals used; and Refinement: reducing the distress of laboratory animals), and carry out experiments appropriately from a scientific perspective.
- In research and studies utilizing human-derived cells and tissues, such as stem cells, we give our utmost consideration to the issues of bioethics and human rights. We conduct such research after prior approval by the Ethics Review Committee.

17

Export and Import

We implement appropriate export and import procedures in compliance with export- and import-related laws, regulations, international treaties, and other arrangements.

When importing or exporting products, goods, raw materials, and samples for research and development, we respect the rules of other countries as well as Japan, and appropriately carry out customs procedures and declarations. When exporting specific products or technical materials to specific regions controlled by laws and regulations from the viewpoint of international security, we will determine whether or not such laws and regulations are applicable to such products or technical materials in advance in accordance with internal procedures and obtain government approval for export.

- In carrying out import and export transactions, we understand and comply with relevant laws and regulations, and correctly carry out export and import procedures and declarations related to customs clearance.
- We make sure to correctly check whether or not a product or technology to be exported falls under the category of specified products or technology for which export is regulated.

18

Clinical Development

In course of conducting clinical trials, we respect the human rights of clinical trial subjects and secure their safety, along with ensuring the quality and reliability of data, in accordance with relevant laws, regulations, and internal rules.

We comply with ethical principles based on the Declaration of Helsinki and conduct clinical trials with the highest priority given to the health and safety of subjects. If it is judged that there is a problem in the conduct of the clinical trial, we will review the clinical study plan immediately to determine whether or not to continue the clinical study.

- We conduct clinical trials in compliance with relevant laws, regulations, internal rules and various procedures and in accordance with a protocol that is adequately assured of ethical and scientific validity.
- We respect the human rights of subjects, ensure their safety as the top priority, and obtain appropriate informed consents. In addition, we always consider and act from the viewpoint of the subjects, including protection of their personal information.
- We proactively disclose information on the provision of funds to medical institutions, etc., and ensure transparency in our relationships with them.
- We support studies led by researchers in compliance with applicable local laws and regulations as well as other relevant regulations and industry codes to ensure transparency.
- We strive to release publicly, after peer review, the outcome of clinical studies performed on our products under development for the purpose of providing information to medical societies and associations.

19

Product Quality

Our top priority is to steadily supply high-quality products with an emphasis on efficacy and safety to patients around the world. We provide a timely and appropriate supply of products in accordance with relevant laws, regulations, and internal rules.

As a supplier of life-related products, we are strongly aware of our social responsibility. To ensure their efficacy, safety, and quality, we manufacture our products in accordance with relevant laws, regulations, and internal rules, and provide stable supplies to medical institutions and patients. To protect the safety of patients, we take all possible measures to ensure that our products do not cause any damage to human life and health.

- We comply with all relevant laws, regulations, and internal rules through adequate manufacturing control and quality control throughout the entire production process, from the receipt of raw materials to the packaging and shipment of finished products, and ensure the timely and appropriate supply of products.
- We shall promptly report to the supervisor any concern related to the efficacy, safety, and quality, no matter how minor it may seem.

20

Management of Information Related to Product Efficacy, Safety, and Quality

We provide timely and accurate information related to product efficacy, safety, and quality in accordance with relevant laws, regulations, and internal rules with the aim of ensuring proper use of the products manufactured and sold by the Company.

To ensure the proper use of our products, we always collect and examine information on their efficacy, safety, and quality, and promptly and accurately provide such information to the regulatory authorities and medical institutions.

- We have a legal obligation to collect and report any and all information about the safety of our products, whether they are being developed or sold.
- We will immediately report information on the effectiveness, safety and quality of our products to the department in charge of pharmacovigilance and the department in charge of quality assurance.
- Inquiries about complaints and quality information will be handled with appropriate respect for personal information.

21

Promotion Activities

When providing medical or pharmaceutical information to healthcare professionals, we provide, gather, and communicate accurate information based on solid medical and pharmaceutical evidence in accordance with relevant laws, regulations, our industry's Code of Practice, and internal rules.

We act with the conviction that "the dignity of life is at all times our first priority, and we shall always fulfill society's trust in us." We conduct all promotional activities, including materials and information used for information gathering and information provision based on high ethical standards, in compliance with relevant laws, regulations, our industry's Code of Practice and internal rules.

- We acquire the necessary medical and pharmaceutical knowledge, and provide, collect, and communicate accurate and appropriate information.
- We provide information on indications, usage and dosage, etc. to the extent approved by the regulatory authorities based on scientific evidence and without bias in terms of efficacy and safety.
- We prepare and use materials for promotional activities after their review and approval in accordance with the in-house review system.

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Evaluation of Business Partners

We are required to appropriately evaluate suppliers and other third parties with whom we trade.

Before trading with a supplier or other third party, we are required to conduct screening and evaluation in an appropriate manner based on the nature of our relationship and the importance with that party.

- We evaluate our business partners based on the nature of transactions, their substance, financial positions, supply stability, quality controls and other factors.
- In cases where a supplier or third party does not meet our required standards or falls short on an issue, we request the party to meet our standards and do not start transactions with the party unless it meets our standards.
- We do not trade with any entity with human-rights problems, such as child labor or slavery.

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Respect for Intellectual Property

Recognizing that intellectual property is an important asset of the Company, we take appropriate steps to protect our intellectual property. In addition, we respect the intellectual property rights of others and will not engage in infringement or unauthorized usage.

Intellectual property such as patents and inventions, utility models and devices, designs, copyrights, trademarks, trade names and brands are the results of the efforts of companies and individuals. We take full care not to infringe upon the intellectual property rights of others, while proactively taking steps to protect the intellectual property created through our research, development and other activities.

- We do not upon the intellectual property rights of any other party. We pay careful attention to avoid unauthorized use when conducting research and development or selecting trademarks, etc.
- We manage and use trade names and trademarks appropriately in accordance with internal rules.

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Handling of Confidential Information

We recognize that confidential information, such as non-public information, know-how and customer information, is an important asset of the Company. Therefore, we use and control such confidential information appropriately in accordance with relevant laws, regulations, and internal rules.

We understand that confidential information is an important asset of the Company, and recognize the increasing risk of outflow and leakage of confidential or other information with advances in IT technology. Therefore, we pay utmost attention to the handling of such information. In addition, we respect and handle confidential information disclosed by third parties with the same care.

- We do not use confidential information for any purpose other than business and appropriately control confidential information according to its importance to prevent improper use and disclosure.
- We disclose confidential information only to persons concerned to the extent necessary for their duties.
- We execute confidentiality agreements without fail before disclosing confidential information on our products or technologies to third parties.

In addition, we shall handle confidential information disclosed by third parties in the same strict manner as the confidential information of the Company, and comply with the terms and conditions of confidentiality agreements with third parties.

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Use of Communication Channels

We take responsibility for the outcome and impact on social reputation arising from the use of communication channels, including social media, regardless of whether it is for business or personal use.

We make sensible and sound judgement before and when using communication channels.

- For business use of communication channels, we confirm strictly in advance that information will be released using proper communication channels in accordance with internal rules. We also confirm whether the information to be released will not be of a nature that will undermine our social trust.
- For the personal use of social media, we do not make any remarks that may be mistakenly considered as JCR Pharma' s promotion activities or be regarded as an official corporate position. We do not make any senseless, offensive, defamatory, or discriminatory remarks that may damage the trust of our colleagues, our customers, etc. We do not disclose any confidential or personal information through social media.

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Prohibition of Insider Trading

We do not commit acts that violate insider trading regulations or acts that could be suspected of violating such regulations.

Insider trading refers to "the purchase or sale of shares or other securities of a company, before the disclosure of information that may have a significant impact on the stock price of the company ("Material Facts") by a person who is aware of such important information." Such transactions are strictly prohibited by laws and regulations because they cause significant inequality for ordinary investors and undermine the soundness of the securities market.

- When we become aware of any Material Facts of the Company that has not yet been disclosed to the public, we do not purchase or sell any shares of the Company until such information is disclosed to the public.
- In addition to not engaging in insider trading on our own accounts, we also do not talk about Material Facts not disclosed by the Company to our family members, acquaintances and business partners, as it may lead to insider trading by such persons.
- When buying or selling shares of the Company, we must obtain internal approval in advance in accordance with internal rules, including cases where family members residing with us buy or sell the shares.

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Handling of Personal Information

To protect the interests of individuals, we appropriately handle the personal information of customers, patients, clinical trial subjects, donors of human cells, tissue and other biological samples, shareholders, and employees in accordance with relevant laws, regulations, and internal rules.

We handle various kinds of information in accordance with relevant laws and regulations, our internal rules and personal information protection policies to prevent unauthorized outflows and incidents relating to personal information.

- When acquiring personal information, we specify clearly its purpose and acquire personal information only when it is necessary for business purposes and only when we obtain the consent of the disclosing party.
- Personal information acquired will not be used for any purpose other than the authorized purpose for which it was acquired.
- We take preventative measures and appropriately control the acquired personal information to prevent its unauthorized use or leakage.
- We do not disclose acquired personal information to any third parties that are not included in the scope of consent by the disclosing party.
- We comply with applicable local laws and regulations when obtaining, transferring or providing personal information across country borders.



JCR Pharmaceuticals Co.,Ltd.