

Corruption and Bribery Prevention Policy

Seikagaku Corporation recognizes that high ethical standards are required of a pharmaceutical company that supplies the world with safe and useful pharmaceuticals and other products. In accordance with this Corruption and Bribery Prevention Policy, we will engage in appropriate business operations by building and maintaining fair, highly transparent, and sound relationships with our stakeholders.

1. Scope of application

This Policy applies to all directors, officers, and employees of Seikagaku Corporation and its subsidiaries.

2. Legal compliance

We comply with anti-bribery laws, regulations, and industry standards applicable in all countries and regions where Seikagaku Corporation engages in business activities.

3. Prohibition of corruption

We do not engage in corruption. Our personnel are expected to avoid any conflicts of interest, illegal actions, whether for individual or organizational gain, including fraud, money laundering, or insider trading.

4. Prohibition of bribery

We do not offer bribes to, or demand or accept bribes from, other individuals including, government officials, public servants, medical practitioners, and company representatives, either directly or indirectly, for the purpose of securing or maintaining a business benefit.

5. System for the prevention of corruption and bribery

To prevent corruption and bribery, we provide education and training to directors, officers, and employees of Seikagaku Corporation in accordance with this Policy and, through our internal reporting system, appropriately deal with questions or allegations of corruption or bribery.

6. Violations

If any violation of this Policy occurs, the company may impose discipline on the directors, officers, or employees in accordance with the rules of employment. We will also strive to prevent any reoccurrence.

April 1, 2023

President & CEO

A handwritten signature in black ink, appearing to read 'C. Minato', is positioned below the printed name of the President & CEO.