Ono Pharmaceutical Code of Practice

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[Preamble]

Ono Pharmaceutical is committed to contributing to the improvement of the health and welfare of people in Japan as well as globally through the development of innovative, highly useful, and safe drug products. To reach this goal, we strive to build relationships of mutual trust with researchers, healthcare professionals, patient organizations, and other stakeholders in an appropriate academic-industrial alliance, enabling optimal medical care that is ethical and is provided in the patient's best interests.
The company has introduced the "Ono Pharmaceutical Code of Practice" (hereinafter referred to as "this Code of Practice") to ensure high ethical standards in all corporate activities as well as thorough compliance with laws and regulations.

[Ethics]

Competition among companies in most markets can often "heat up" too much; it cannot be denied that, in the past, the same conduct could be seen in the promotion of drug products. Therefore, various legal regulations and self-imposed rules are currently in place to curb this behavior, such as the Law on Securing Quality, Efficacy and Safety of Products Including Pharmaceuticals and Medical devices (hereinafter "Pharmaceuticals and Medical Devices Act"); the Revision of the Standard for Adequate Advertisement of Pharmaceutical Products (PSEHB Notification No. 0929-4 dated September 29, 2017; hereinafter "Standard for Adequate Advertisement of Pharmaceutical Products"); the Guidelines for Sales Information Provision Activities, the Fair Competition Code concerning Restriction on Premium Offers in Ethical Pharmaceutical Drugs Marketing Industry (hereinafter "Fair Competition Code"); the Guidelines for the Preparation of Product Information Brochure of Ethical Drugs (hereinafter "Preparation Guidelines"); and the Guidelines for MR Education and Training.

It is well known that drugs have the following characteristics:

(1) Quality cannot be confirmed by its appearance alone.
(2) Drugs produce both desired effects and adverse reactions, and the occurrence varies among individuals.
(3) Therefore, drugs cannot fulfil their function appropriately without correct drug information.
(4) Consumers consist of only patients who need drugs therapeutically, and additional market value cannot be generated through promotions.

Due to these characteristics, it is necessary for drug manufacturers to comply with the aforementioned legal

regulations and self-imposed rules.
We have to keep in mind that the market environment of pharmaceutical companies has been diverse and complicated, and often, events that cannot be addressed by conventional means have occurred. Moreover, society requires a fairer and more transparent relationship between pharmaceutical companies and healthcare professionals. In this situation, if the characteristics of drugs are ignored, it may cause serious damage for individual patients and to society as a whole, such as serious health hazards and unnecessary medications. In this instance, the social credibility of drugs and the entire pharmaceutical industry will be greatly damaged by its own hands, which could also lead to unfortunate consequences for both the company and society. It is therefore clear that the company will acquire nothing and even lose everything due to such actions. In other words, the company should not simply accept these legal regulations and self-imposed rules as "objects to be complied with," but should rather accept and comprehend them as a "reflection of the image for pharmaceutical companies expected by society" from a broader perspective, based on the purpose and background of these regulations.
Corporate activities based on ethical standards will create an invaluable foundation in the form of "social credibility" for drugs and pharmaceutical companies. This is easier to understand if you look at the pharmaceutical industry from the perspective of a patient or member of society. Each person has a role to play as a member of the society to which they belong (home, workplace, community, or other places or settings). Our society is built on the premise that people play the role that is expected of them, and society will crumble if this premise is compromised.
The same is true for our company. Considering our company's drug products, people in society receive medical care on the premise that excellent drugs are used appropriately, regardless of the presence or absence of legal regulations and self-imposed rules. "Corporate Social Responsibility" should also be understood as an important proposition, especially in the pharmaceutical industry.
There is a Chinese character included in a Japanese phrase—"Rinri (ethics)"—which refers to the human and social relationships that we expect from each other. The company is required to not only comply with legal regulations and self-imposed rules, but also to actively respond to the expectations of society.

[Basic philosophy]

Advances in both medical and pharmaceutical sciences and improvements in public health are built upon interactions aimed at sharing information throughout the entire healthcare community, including researchers, healthcare professionals, patient organizations, wholesalers, and our company. Integrity is essential to these interactions, and conviction regarding the idea that decisions are made ethically and in the patient's best interests is always required.

The Japan Pharmaceutical Manufacturers Association (JPMA) provides the basic principles of corporate activities in the JPMA Code* to ensure that member companies have appropriate interactions with external stakeholders (hereinafter "stakeholders").

The JPMA Code is helpful in ensuring that member companies contribute greatly to public health—not only in Japan, but also in the world—while complying with a code of conduct based on high ethical standards. It serves as a standard for all interactions between member companies and stakeholders.

The company is responsible for performing corporate activities with a high level of ethics and transparency and is also required to ensure that the JPMA Code is recognized by the public—including researchers, healthcare professionals, patient organizations, and wholesalers—and to promote activities based on the JPMA Code and this Code of Practice.
The company should always judge activities based on whether they are in accordance with the spirit of the JPMA Code and this Code of Practice, regardless of the presence or absence of specific descriptions in these codes.
In case of an emergency such as a large-scale disaster, for example, it is necessary to implement flexible responses by prioritizing human lives above everything else.

* The International Federation of Pharmaceutical Manufacturers & Associations (hereinafter "IFPMA") developed the "IFPMA Code of Practice" (hereinafter "IFPMA Code"), which involves not only marketing activities but also interactions with healthcare professionals, medical institutions, and patient organizations as well as the promotion of drugs, in place of the existing IFPMA Code of Pharmaceutical Marketing Practices. In association with this development, JPMA has developed the "JPMA Code of Practice" (hereinafter "JPMA Code"), which covers interactions between all officers and employees of member companies and researchers, healthcare professionals, and patient organizations, among others, further expanding the former JPMA Promotion Code for Prescription Drugs in line with the intent of the revision of the IFPMA Code.

I-1 Ono Pharmaceutical Code of Practice

Considering that our company is engaged in corporate activities under the public medical insurance system as a member of the life-related industry, the company will comply with not only related laws and regulations (e.g., the Pharmaceuticals and Medical Devices Act), the Standard for Adequate Advertisement of Pharmaceutical Products, and the Guidelines for Sales Information Provision Activities, but also with self-imposed rules (e.g., the Fair Competition Code, Code of Practices for Pharmaceutical Industry, the JPMA Charter for the Activities of Pharmaceutical Companies, and the JPMA Compliance Program Guidelines). It will also perform its activities in line with high ethical standards.

1. Scope and definition of promotion

1.1. Scope

This Code of Practice not only applies to promotional activities for ethical drugs, but also to all interactions between the company and researchers, healthcare professionals, medical institutions, patient organizations, and wholesalers. The company will—based on this Code of Practice—comply with the JPMA Code and respect the IFPMA Code, the code of the organization to which JPMA belongs. Moreover, the company will always judge activities based on whether they are in accordance with the spirit of this Code of Practice, regardless of the presence or absence of specific descriptions in it.

1.2. Definition of promotion

“Promotion” does not refer to so-called “promotion of sales” but rather to the “provision to, collection from, and communication with healthcare professionals of drug information to promote the appropriate use and diffusion of ethical drugs based on this information.”

2. Responsibility of top management.

The top management of the company will implement the following:

(1) Lead the initiative concerning the matters specified in this Code of Practice, thoroughly disseminate them to the relevant stakeholders, and organize the company structure based on this code, understanding that top management must take responsibility for the activities of all officers and employees and recognizing that it is their function to take action based on the “Basic philosophy.”
(2) Resolve problems, investigate the cause, and prevent recurrence of these problems on their own responsibility if a situation that goes against the spirit of this Code of Practice occurs.
(3) Require divisions that handle non-pharmaceutical products to conduct corporate activities in accordance with the spirit of this Code of Practice.
(4) Require subsidiaries that manufacture and market drugs in Japan to comply with this Code of Practice.
(5) Express compliance with this Code of Practice to partner companies and subsidiaries, among others, that market pharmaceutical products in Japan and internationally and seek understanding on it from them.

3. Basics of interactions

3.1. Basics of interactions

Advances in medical and pharmaceutical sciences and improvements in public health are built on interactions aimed at sharing information throughout the entire healthcare community, including researchers, healthcare professionals, patient organizations, wholesalers, and our company. Integrity is essential for these interactions. In such interactions, society should be able to trust that decisions are made ethically and in the patient’s best interests. The company will strive through its actions to be trusted by the government, healthcare professionals, and patients, among others, to always conduct its activities ethically.

3.2. Transparency of interactions

As life science companies, pharmaceutical companies are required to have high ethical standards, and our company needs to achieve accountability for our interactions with researchers and healthcare professionals. Moreover, our collaborations with patient organizations must be ethical and honest. The company will maintain transparency of corporate activities and be accountable to society according to our rules based on the JPMA Transparency Guidelines for Medical Institutions, the Guidelines for Collaboration with Patient Organizations, and the Transparency Guidelines for Patient Organizations.

4. Interaction with healthcare professionals

Concerning interactions between our company and healthcare professionals, we set as our top priority

contributing to the benefit, health, and welfare of patients, aim at contributing to advances in medical/pharmaceutical sciences and improvements in public health, and focus on drug information services, medical/pharmaceutical science-related academic exchanges, and research supports. Moreover, even when promoting industry-academia collaboration for advances in medical/pharmaceutical sciences, the company will establish relationships of trust with researchers, healthcare professionals, and patient organizations, and will not conduct corporate activities that may inappropriately influence decisions on prescriptions.

5. Prohibition of information provision before approval and recommendation of off-label use

Drugs must not be promoted until they are approved in Japan. Further, off-label use must not be recommended.

6. Information service activities

As a life science company, the company will provide scientific and objective information on drugs at appropriate times. When providing information, we shall endeavor to ensure that the content and expressions used are easy for users to understand, and we shall also comply with legal regulations and self-imposed rules. Furthermore, the Pharmaceuticals and Medical Devices Act and the Standard for Adequate Advertisement of Pharmaceutical Products prohibit advertising prescription drugs to non-healthcare professionals. Therefore, even in the case of information service activities—such as press releases, disease awareness-raising activities for the general public and patients, and information provision to investors—we shall scrutinize the contents from the planning stage to ensure that they are not suspected to be advertising ethical drugs or recommending unapproved drugs or off-label use. Activities to provide information to healthcare professionals are stipulated in “I -2 Ono Pharmaceutical Promotion Code for Prescription Drugs.”

Regarding the Guidelines for Sales Information Provision Activities, the Compliance Promotion Department will be responsible for ensuring that each division complies with the guidelines.

6.1. Promotional materials (including electronic media)

The company will comply with the related laws and regulations as well as self-imposed rules, such as the Preparation Guidelines, when preparing promotional materials, including electronic media (hereinafter “promotional materials”).

6.2. Social media

Considering the use of digital communications such as social media, the company will be entirely responsible for the contents. Therefore, we shall only implement the operations after confirming compliance with this Code of Practice together with relevant subsidiaries, partner companies, planning companies, agents, and officers and employees of the company.

7. Lecture presentations and meetings

The company may provide lecture presentations to communicate, for example, medical/pharmaceutical or

disease awareness information. When providing lecture presentations, the Fair Competition Code and legal regulations will be complied with, such as selecting appropriate content and venues, among others, as a pharmaceutical company.
Furthermore, when the company calls a meeting in which healthcare professionals are invited to seek professional advice for its activities, the meeting will not be used as a means of engaging in promotional activities. The number of attendees will be minimized and the appropriate persons selected according to the purpose of the meeting.

8. Consignment of operations

The company can consign operations—such as research, clinical trials, post-marketing surveillance, consultation/advice, participation in meetings, chairing or lecturing at a lecture presentation, or giving instruction at a training course—to researchers, healthcare professionals, medical institutions, or patient organizations and provide compensation or expenses. However, a contract must be concluded to assign these operations. The contract must meet all of the following criteria:

(1) A written contract specifying the purpose of the operations and the grounds for payment of compensation or expenses for these operations must be concluded.
(2) The legitimate need for these operations must be specified beforehand.
(3) A consignee is directly related to the specified need, and should be able to provide technical knowledge during operations.
(4) The number of consignees is appropriate to achieving the specified need.
(5) The assignment is not to invite the prescription, purchase, or recommendation of particular drugs.
(6) The compensation for operations consigned is appropriate for the operations.

9. Provision of goods and money

The company will not provide goods or money—directly or indirectly—that may improperly influence the decision-making of stakeholders in the medical community. This includes researchers, healthcare professionals, medical institutions, patient organizations, and wholesalers.
Further, even if this does not apply, the company will not provide goods or money that may harm the value and quality of any drug that would make it difficult to gain understanding and acceptance within society.

10. Drug samples

Drug samples serve the purpose of providing drug information and to convey the external characteristics of drugs to healthcare professionals or for them to be used to help confirm and evaluate the quality, efficacy, and safety of the drugs.
Therefore, when providing a drug sample, the quantity provided will be the minimum necessary, along with information on the drug.

11. Studies and research activities

Studies and research activities—including non-clinical studies, clinical research, epidemiological research,

and clinical studies (clinical trials and post-marketing clinical studies)—must comply with high ethical standards and have legitimate scientific purposes at each stage, in accordance with laws and regulations and ethical guidelines stipulated by the government. Research and development expenses and academic research grants arising from the implementation of these studies/research are subject to information disclosure stipulated in the Transparency Guidelines for Medical Institutions. Therefore, appropriate accountability will be upheld according to the guidelines.
To ensure the transparency of clinical study information, the information will be disclosed in accordance with the "Joint Position on the Disclosure of Clinical Trial Information via Clinical Trial Registries and Databases (2009)" and the "Joint Position on the Publication of Clinical Trial Results in the Scientific Literature (2010)," which are joint guidelines of JPMA, IFPMA, European Federation of Pharmaceutical Industries and Associations (EFPIA), and Pharmaceutical Research and Manufacturers of America (PhRMA).
Further, to reduce adverse reactions to drugs as much as possible, we will develop safer and more effective drugs and at the same time further improve the research and development system for conducting appropriate self-management of laboratory animals necessary for development from the perspective of animal welfare.

12. Collaboration with patient organizations

The company will adhere to high ethical standards in every collaboration with patient organizations and respect the independence of these organizations. Efforts will also be made to mutually understand the purpose and content of collaborations with patient organizations. Therefore, when collaborating with patient organizations, rules will be established based on the Guidelines for Collaboration with Patient Organizations to be used as a code of practice for the company.
Regarding financial and other support provided by the company to patient organizations, the company's involvement will be disclosed to be widely recognized that the support activities contribute to the activities and development of the patient organizations. We shall also agree on the purpose and content in writing and ensure transparency by keeping appropriate records. When providing financial support to patient organizations, the company will disclose the information after the establishment of the standards of our company based on the Transparency Guidelines for Patient Organizations.

13. Relationship with wholesalers

Relationships between pharmaceutical companies and wholesalers must be fair business relationships and must comply with legal regulations, such as the Antimonopoly Law, as well as self-imposed rules. Additionally, considering that transactions take place within the public medical insurance system, the relationship must ensure higher ethical standards and transparency than those in other industries. Therefore, the company will voluntarily formulate and comply with appropriate standards when providing money, goods, food/beverages, or other similar products to wholesalers, or receiving these from them.

14. Internal procedure and education

The company will establish and maintain appropriate internal procedures to comply with the relevant laws and regulations as well as the JPMA Code, and provide appropriate education to all officers and employees of the company, according to their roles or positions.

15. Inquiries, complaints, and reactions

If there is an inquiry or complaint concerning the JPMA Code or this Code of Practice or a suspected violation of these codes, the Ono Pharmaceutical Code of Practice Steering Committee will take measures to address the inquiry, complaint, or violation.

16. International activities

16.1. Rules applicable to activities conducted outside of Japan

The company will adhere to this Code of Practice even during activities outside of Japan and comply with relevant laws and regulations as well as the pharmaceutical industry code, if any, of the country concerned. If there is no such code, the IFPMA Code will be complied with.

16.2. Provision of drug information outside of Japan

Regarding drug information provided to international healthcare professionals directly or indirectly through agents, for example, the company will provide the information—which applies internationally—according to relevant laws and regulations as well as the pharmaceutical industry code, if any, of the country concerned, or the IFPMA Code if there is no such code.

16.3. Accommodating domestic healthcare professionals abroad and international healthcare professionals in Japan

The company will comply with this Code of Practice when accommodating domestic healthcare professionals at lecture presentations or academic conferences held in other countries. Moreover, when inviting international healthcare professionals to lecture presentations and the like held in Japan, the company will comply with the relevant laws and regulations as well as the pharmaceutical industry code, if any, of the country concerned, or the IFPMA Code if there is no such code.

16.4. Actions by overseas subsidiaries, licensees, and agents

When an international subsidiary operates in another country, the company will require the subsidiary to comply with the relevant laws and regulations as well as the pharmaceutical industry code, if any, of the country concerned, or the IFPMA Code if there is no such code. Furthermore, when foreign licensees and agents are engaged in activities in their country under a license or agency agreement, the company will require them to comply with the relevant laws and regulations as well as the pharmaceutical industry code, if any, of the country concerned, or the IFPMA Code if there is no such code.

17. Revision, abolishment, and management

(Attachment: Ono Pharmaceutical Code of Practice Steering Committee Regulations)

I-2 Ono Pharmaceutical Promotion Code for Prescription Drugs

Ono Pharmaceutical's Promotion Code for Prescription Drugs (hereinafter "ONO-P Code") was established to clarify the code of practice that pharmaceutical companies should comply with when promoting ethical drugs and to ensure that all officers and employees of the company conduct appropriate promotion. "Promotion" does not refer to so-called "promotion of sales" but rather refers to the "provision to, collection from, and communication with healthcare professionals of drug information to promote the appropriate use and diffusion of ethical drugs based on this information." The company should always judge activities based on whether they are complying with the spirit of the ONO-P Code, regardless of the presence or absence of specific descriptions in the promotion code. Moreover, any act that violates legal regulations, the Standard for Adequate Advertisement of Pharmaceutical Products, the Guidelines for Sales Information Provision Activities, or self-imposed rules for promotions, will be deemed to be in violation of this Code of Practice, even if there is no specific description concerning the violation.
The ONO-P Code will be revised in accordance with the establishment, revision, or abolition of the IFPMA Code, legal regulations, and self-imposed rules as well as changes in other regulations or the environment of the promotional activities.

1. Responsibility of the company in promotional activities

The company takes full responsibility for promotions, including the activities of medical representatives (hereinafter "MR"). The company will establish an internal system to ensure appropriate promotion based on this awareness and that all officers and employees adhere strictly to this system.
The ONO-P Code applies not only to promotional activities but also to activities that are regarded as promotion, regardless of whether the organization that conducts these activities is a sales division.

(1) Appoint an appropriate person as an MR and provide continuous education and training for the appropriate use and diffusion of drugs.
(2) Refrain from developing an evaluation/remuneration system that may induce unethical behavior in MRs.
(3) Provide information considering the indications, and dosage and administration, among others, of drugs in an appropriate manner based on the latest data with clear scientific grounds and within the scope of approval for the drugs.
(4) Collect and distribute drug information appropriately and promptly.
(5) Establish an internal system to comply with legal regulations and self-imposed rules.

(Attachment: Ono Pharmaceutical Code of Practice Steering Committee Regulations)

2. Code of practice for MRs

MRs will implement the following in good faith, being fully aware of their social mission as someone partly responsible for medical care and their position to provide drug information on behalf of the company.

(1) Make concerted efforts to acquire knowledge on package inserts of the company's own products and medical/pharmaceutical knowledge as a basis and cultivate the ability to properly provide such knowledge.
(2) Conduct promotions in accordance with the contents and methods specified by the company.
(3) Provide information on the indications, and dosage and administration, among others, of drugs fairly and within the approved range without bias to promote efficacy and safety.
(4) Collect and distribute drug information appropriately and promptly.
(5) Do not slander or defame other companies and their products.
(6) When visiting a medical institution, comply with the rules established by the medical institution and act in an orderly manner.
(7) Act as an MR in a sensible manner, complying with legal regulations and self-imposed rules.

3. Preparation and use of printed promotional materials and advertisements

We recognize that printed promotional materials, advertisements in scientific journals, websites for healthcare professionals, audiovisual materials such as slides and motion pictures, and other promotional materials prepared by the company are important means of providing drug information. Therefore, when preparing and using these materials, we shall comply with the Pharmaceuticals and Medical Devices Act, administrative notifications, and self-imposed rules such as related preparation guidelines. The company will also ensure that the descriptions are accurate, fair, and objective based on scientific grounds and that they comply with the following principals.

(1) Do not describe indications, and dosage and administration, among others, beyond the approved range.
(2) To ensure efficacy and safety, do not use false or exaggerated expressions or misleading displays, layouts, and expressions. Avoid using expressions that particularly emphasize or guarantee safety.
(3) Describe information on safety such as adverse reactions fairly without placing disproportionate emphasis on efficacy.
(4) Compare with other drugs based on objective data and using generic names in principle.
(5) Do not use descriptions that slander or defame other companies or their products.
(6) Do not use expressions that create the impression that exceptional data are general facts.
(7) Do not use photographs or illustrations that may cause misunderstandings or that may damage the value and quality of the drug.
(8) For printed promotional materials or advertisements, establish an internal management system led by an individual responsible for the management of ethical drug product information brochures and use only those that have undergone review.

4. Consignment of operations

The company can request lectures, writings, surveys, studies, participation in meetings organized by the company, and trainings to healthcare professionals and pay remuneration or expenses associated with these operations. However, the payment must not be unusually high considering the content of the assigned operation.

5. Implementation of post-marketing safety management and post-marketing surveillance

The company, while considering the purpose of establishing the appropriate use of drugs after marketing, will implement post-marketing safety management and post-marketing surveillance based on scientific grounds and in compliance with legal regulations and self-imposed rules without using them as sales promotion tools.

6. Provision and management of drug samples

Drug samples are means of providing drug information to stakeholders. There are two types of drug samples: a “preparation example” to convey the external characteristics of an ethical drug to healthcare professionals and a “drug sample for clinical use” to be used by doctors to confirm and evaluate the quality, efficacy, safety, and formulation properties prior to its use.

In both cases, the drug samples must be accompanied with information concerning the ethical drug and the amount must be minimal.

Specifically, as “drug samples for clinical use” are actually used in clinical practice, a strict management system must be established and operated appropriately.

Note: Drug samples will be provided in accordance with the internal operation standards that have been established separately.

7. Implementation of lecture presentations

Lecture presentations provided to healthcare professionals by the company will impart professional, academic, and scientific information to the attendees. Concerning the venue of lecture presentations, an appropriate place suitable to the purpose and located in Japan—as a general rule—will be selected. If food and beverages are provided during these lecture presentations, they will not be too luxurious and not harm the companies’ character as a pharmaceutical company. Provision of funds in association with lecture presentations will be limited to travel expenses (transportation expenses and accommodation expenses) and lecture fees for presenters.

Travel expenses for accompanying persons will not be paid and their participation in social gatherings will not be permitted. When planning a lecture presentation for the purpose of providing disease awareness information to non-healthcare professionals, it will be implemented while considering the Pharmaceuticals and Medical Devices Act and Standard for Adequate Advertisement of Pharmaceutical Products.

8. Provision of goods

The company will not provide goods that may improperly influence the appropriate use of drugs or harm the value and quality of drugs to healthcare professionals or medical institutions.

9. Provision of money

The company will not provide, directly or indirectly, money that may improperly influence the appropriate use of drugs to healthcare professionals or medical institutions.

10. Relationship with the Fair Competition Code

The company will more actively and strictly comply with the Fair Competition Code. The company will operate under high ethical standards in addition to the attitude of observing the Fair Competition Code.

Attachment

Ono Pharmaceutical Code of Practice Steering Committee Regulations

The Code of Practice Steering Committee (hereinafter "the Committee") is established under the Ono Pharmaceutical Compliance Committee.

1. Purpose

   To thoroughly disseminate the Ono Pharmaceutical Code of Practice and assess compliance.

   This Code of Practice shall be reviewed and revised as necessary, following the establishment or revision of related legal regulations and self-imposed rules.

2. Composition
   (1) The Committee is composed of the following divisions:

   Sales and Marketing

   Corporate Regulatory Compliance, Safety and Quality Assurance

   Corporate Development and Strategy

   Clinical Development,

   Discovery and Research

   CMC and Production

   Corporate Strategy and Planning

   Medical Affairs

   Corporate Communications

   External Affairs

   Compliance Management Department

   (2) The senior director of the Compliance Management Department will chair the Committee.
   (3) Members of the Committee are comprised of senior directors of the above-mentioned organizations or those who are designated by these senior directors.
   (4) The Compliance Management Department and the Strategic Sales Planning Division assume the secretariat.
3. Steering and management of the Committee
   (1) The Committee is convened by the chairperson.
   (2) The Committee shall manage this Code of Practice (revision, abolition, etc.) and report on its management status to the Compliance Committee.
4. Compliance with the code
   (1) Compliance with this Code of Practice in business operations is assigned to each committee member.
   (2) The chairperson will be responsible for the management of this Code of Practice and serve—along with the secretariat—for consultation on matters related to this Code of Practice to promote compliance with the code.
5. Reporting to the Compliance Committee

   The content of the Committee meeting will be provided to the Compliance Committee in the meeting minutes. If there are any issues that need to be reviewed by the Compliance Committee, it will be requested to hold the Compliance Committee. In the case of suspected violation of this Code of Practice, the Committee will discuss the case and report on the violation to the Compliance Committee.

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