

# Ono Pharmaceutical Global Anti-Bribery and Corruption Policy

## Chapter 1: General Provisions

### (Purpose)

Article 1. The purpose of the Global Policy is to comply with laws and regulations as stipulated by the Ono Pharmaceutical Code of Conduct, as well as to maintain a fair relationship with society from the perspective of preventing bribery and corruption.

### (Scope)

Article 2. The Global Policy applies to corporate officers, employees, contracted employees, loaned employees, advisors and temporary employees of Ono Pharmaceutical Co., Ltd. and its subsidiary companies (hereinafter "Officers and Staff of the Ono Pharmaceutical Group" or "We").

### (Practice of the Prevention of Bribery and Corruption)

Article 3. We shall prevent bribery and corruption in conducting corporate activities, in accordance with the Global Policy, as well as the Anti-Bribery and Corruption Code of the Ono Pharmaceutical Group.

### (Code and Guidance)

Article 4. The Anti-Bribery and Corruption Code shall be established as general provisions for the prevention of bribery and corruption in our corporate activities, while the detailed rules on Anti-Bribery Due Diligence for Third Parties and the detailed rules on Provision of Business Entertainment and Gifts shall be established as detailed rules.

## Chapter 2: Organizational Framework for Promoting the Prevention of Bribery and Corruption

### (Organizational Framework for Promoting the Prevention of Bribery and Corruption)

Article 5. Persons responsible for and persons doing the actual work of preventing bribery and corruption shall be appointed at the Ono Pharmaceutical Group, and be charged with their respective duties, in order to promote the prevention of bribery and corruption.

## Chapter 3: Implementation of the Prevention of Bribery and Corruption

### (Prohibition on Bribery and Corruption)

Article 6. "Public officials" as referred to in the Global Policy shall include:

- individuals engaged in the official duties of a government or a local public organization,
- full-time officials at government-affiliated organizations,
- individuals engaged in official duties at public corporations and
- individuals who have been commissioned or delegated duties or authority by a government.

2 "Money or Other Gains" as referred to in the Global Policy shall not be limited to gains of assets

but shall also correspond to anything that serves to satisfy the demands and desires of an individual including tangible, intangible and financial benefits. Such financial benefits may include financial gain, free rent on houses and buildings, provision of entertainment and dining, and provision of collateral, while such intangible benefits may include non-financial gains such as position or status.

- 3 We shall not offer, promise to provide or provide any Money or other Gains through direct or indirect involvement, to any Public Official no matter if domestic or foreign:
  - for the purpose of acquiring illicit gain in business,
  - for the purpose of obtaining or retaining business or an advantage in business by doing so,
  - with the intention of influencing Public Officials in the improper performance of their duties,
  - as compensation for the improper performance of their duties or
  - with the awareness that providing such Money or other Gains could constitute improper performance of their duties.
- 4 We shall not request, promise to receive or receive any Money or other Gains through direct or indirect involvement, from any counterparty no matter if domestic or foreign:
  - for the purpose for the counterparty to acquire illicit gain in business,
  - for the purpose for the counterparty to obtain or retain business or an advantage in business by doing so,
  - with the intention of influencing Officers and Staff of the Ono Pharmaceutical Group in the improper performance of their duties,
  - as compensation for the improper performance of their duties or
  - with the awareness that receiving such Money or other Gains could constitute illicit performance by Officers and Staff of the Ono Pharmaceutical Group of their duties.

(Business Entertainment and Gifts)

Article 7. When providing or receiving entertainment or gifts to or from business partners, we shall comply with laws and regulations as well as corporate codes and not engage in extravagant or excessive behavior based on social standards.

- 2 Relating to entertainment and gifts, we shall comply with internal corporate rules, obtain approvals and accurately record payments made.

(Facilitation Payments)

Article 8. "Facilitation Payments" as referred to in the Global Policy shall refer to payments to Public Officials to circumvent irrational, discriminatory or disadvantageous treatment. This may include payments in small amounts made to low-ranking officials in order to facilitate administrative procedures relating to permits, licenses, or customs clearances.

- 2 We are required to refuse solicitations for Facilitation Payments. Payments may however, be approved in the event there is a potential threat of physical violence when a Facilitation Payment is not made or there is no practical means to avoid unfair violations involving human life, physical well-being or personal property.
- 3 We shall report to our supervisors and the corporate officers in charge of compliance at Ono

Pharmaceutical Co., Ltd., when a Facilitation Payment has been solicited. Reporting after the fact shall be deemed sufficient for payments that correspond to the small amounts described in the preceding paragraph.

(Procedure for Appointing Third Parties)

Article 9. A "Third Party" as referred to in the Global Policy shall be an entity such as a subcontractor or an agent, who may contact Public Officials or Health Care Professionals (HCPs) on behalf of the Ono Pharmaceutical Group.

2 A "Red Flag" as referred to in the Global Policy shall be any situation that suggests the potential for an inappropriate action to be taken by a Third Party with regards to bribery and corruption.

3 An anti-bribery and corruption clause shall be included in any contract with a Third Party, to ensure that such a Third Party does not engage in any act of bribery or corruption. The bribery and corruption prohibition clause may be omitted, however, with the consent of the Legal Department of the Ono Pharmaceutical Group. We shall convey the standards relating to the prevention of bribery and corruption to the Third Party and request that it abide by them.

4 The individuals responsible for the prevention of bribery and corruption at each Ono Pharmaceutical Group entity shall perform due diligence to see if there is any Red Flag when appointing a Third Party. The method for the implementation of due diligence shall be stipulated by the Anti-Bribery and Corruption Code of the Ono Pharmaceutical Group.

(Prevention of Accounting Fraud)

Article 10. All transactions pertaining to corporate assets shall be entirely categorized with the appropriate accounts, recorded and organized in an orderly and clear manner.

2 We shall establish appropriate internal controls in order to prevent and detect bribery and corruption at the Ono Pharmaceutical Group.

3 Personnel in charge of accounting duties at each Ono Pharmaceutical Group entity shall pay attention, to detect signs of bribery and corruption when recording payments and details relating to transactions.

(Education and Training)

Article 11. Education and training related to bribery and corruption prevention shall be provide to Officers and Staff of the Ono Pharmaceutical Group based on the plans established for each fiscal year.

(Disciplinary Actions)

Article 12. In case of a violation of the Global Policy, disciplinary actions shall be taken against such Officers and Staff in accordance with the corporate codes including the Employment Rules of the Ono Pharmaceutical Group.

(Reporting)

Article 13. When any of the Officers and Staff of the Ono Pharmaceutical Group detects or suspects a violation of the Anti-Bribery and Corruption Code of the Ono Pharmaceutical Group, such person shall notify any of the following entities:

1. the relevant supervisor,
2. an executive officer of a group company or

3. the Compliance Hotline.
- 2 In connection with investigations of bribery and corruption reports made by any of the Officers and Staff of the Ono Pharmaceutical Group, details related to the privacy of the person(s) who made the report, such as names and the details of the report, shall not be disclosed to any party other than those who require the information for the investigation.
- 3 The Ono Pharmaceutical Group shall not allow disadvantageous treatment of any of the Officers and Staff of the Ono Pharmaceutical Group who have made a report as described in paragraph 1 of this article.

(Investigations for Bribery and Corruption Prevention)

Article 14. The Chief Compliance Officer of Ono Pharmaceutical Co., Ltd. shall conduct investigations periodically or when needed on the implementation status of bribery and corruption prevention at the Ono Pharmaceutical Group. This Officer may request that Ono Pharmaceutical Co. Ltd. perform an internal audit of the Ono Pharmaceutical Group.

(Supplementary Provision)

This policy was established on April 1, 2017.

- 2 The Global Policy shall be established, revised and terminated by resolution of the Board of Directors of Ono Pharmaceutical Co., Ltd.