

Kyowa Kirin North America Procurement External Provider Code of Conduct

Introduction

Kyowa Kirin, Inc. and its affiliated and wholly owned subsidiaries (collective, “Kyowa Kirin”) is aware of its corporate responsibility towards the people, communities, and environment where we and our External Providers conduct our business. We support a sustainable development policy and the conduct of our people, and our External Providers are a crucial part of that policy. The conduct of our External Provider network is part of an organizational contact policy and discovered by our business integrity policy as well as our company ethical standards.

Scope of the Code of Conduct

The code of conduct as prescribed in this document pertains to all companies and individuals that are within the definition of an External Provider as set out in this document. The code of conduct is not limited by jurisdiction or region but does not supersede any regulations or laws that might be in effect within these regions. Kyowa Kirin North expects that External Providers will apply this code of conduct to their businesses and enact similar policies to their own External Provider network. An External Provider (previously referred to as vendors or suppliers) is defined as an individual or company that provides goods and/or services to Kyowa Kirin. This includes, but is not limited to material vendors, contracted operations, and service providers.

Legal and Regulatory Compliance

- External Providers of Kyowa Kirin shall conduct their business operations according to the laws and regulations that are in place in their regions, jurisdictions, or countries while they are linked to Kyowa Kirin through an agreement.
- Strict compliance with anti-corruption laws within the countries of operation. Under no circumstances should you make illegal payments directly or indirectly to any government or corporate officials to elicit the abuse of his/her position to obtain or retain contractual business from said organizations.
- Conduct your business in full compliance with any anti-trust or fair competition regulation in place within your jurisdiction of business operations.
- Conduct your business in compliance with environmental laws and statutes when it comes to the handling of hazardous material, air emissions, waste products, and wastewater discharge. This includes the transportation, storage, disposal, and release of these waste products and materials into the environment.
- Always conduct your business in an honest and transparent manner with any agency or government officials.

Monitoring and Review

- Kyowa Kirin has a focused Supplier Relationship Management process in place that assists with the selection, monitoring, and evaluation of the supply chain network. The system is based on a risk-based methodology to determine compliance with the code of conduct as well as the internal policies and

procedures of Kyowa Kirin currently in place. This methodology is also in line with the country or jurisdiction in which the External Providers are conducting the business.

- Each External Provider will be evaluated according to this risk-based process before business operations are entered into between Kyowa Kirin and the External Provider. We will also be conducting regular assessments to review the status of each External Provider to maintain a high standard of business relationship between all parties.
- The assessments will be conducted using a self-test questionnaire as well as further in-depth evaluations if it is required. These in-depth assessments will be conducted as and when Kyowa Kirin North America Procurement deems it necessary.
- If any non-compliance is brought to the attention of Kyowa Kirin through any other means, we reserve the right to conduct independent investigations to determine the validity on a case-by-case basis. This does not limit or affect our authority or contractual rights in any way.

Standard Business Practices

- The External Providers and vendors of Kyowa Kirin will always conduct their business with integrity and in compliance with all agreements with Kyowa Kirin. Furthermore, our External Providers will do the following:
 - Accurately record all business transactions and information and comply with the relative laws and regulations pertaining to the recording and storage of this information.
 - Maintain accurate records, both created and stored, in compliance with the regulations pertaining to financial record keeping in your jurisdiction. Responsibly act on behalf of Kyowa Kirin when you are dealing with clients and other External Providers to protect the data and assets of Kyowa Kirin as well as intellectual property.
 - Use company technology and systems for authorized business transactions with clients and providers. It is strictly prohibited to use any Kyowa Kirin technology or systems to create, access, send, print, store, or solicit any abusive, sexually explicit, or offensive material that is deemed inappropriate. The production of false, derogatory, or malicious communications by means of Kyowa Kirin technology or systems is strictly prohibited.
 - Maintain security to protect the intellectual property rights of Kyowa Kirin which includes but is not limited to copyrights, patents, trademarks, or trade secrets. Any usage of software, hardware, or content, electric or otherwise must comply with the specific terms of the license agreements associated with them.
 - Conduct any press conferences or issue press releases on behalf of Kyowa Kirin only with prior authorization.
 - At all times, use good judgment when entertaining Kyowa Kirin employees. The giving of gifts or entertainment must comply with this KKNA code of conduct so as not to breach the ethical standards of Kyowa Kirin. At no time will an External Provider offer any bribes, kickbacks, or any type of barter for a business or incentive to any employee of Kyowa Kirin.
 - Maintain clear business relationships that do not appear or are in fact improper or might be seen as improper. No External Provider will conduct any business with a company if their

spouse, life partner, or any other family member is employed in a department that they deal with. This policy will extend to the negotiation of the External Provider's contract prior to a business relationship being initiated.

- Avoid any insider trading practices when buying or selling of shares of affiliates of Kyowa Kirin shares if you, as the External Provider, come into any information that has not been shared with the public or information that could influence the sale or purchase of Kyowa Kirin or its affiliates shares, products, or services.

Employment Practices

- Kyowa Kirin maintains a higher standard when it comes to human rights and equal opportunity within the workplace. We require our External Providers to comply with the standard and their employment policies as well as keep in line with current laws and regulations within their jurisdictions. The following aspects will gain special attention but will not be limited to these aspects:
 - Ensure that the workplace is free of harassment and unlawful discrimination. We will at times be focusing on creating and maintaining a work environment that does not include hiring discrimination, inequity of compensation, access to training and promotion, wrongful termination or retirement based on age, religion, disability, gender, marital status, sexual orientation, or union memberships as well as political views or legally protected categories.
 - Comply with the relative employment regulations as stipulated in the country of business legislation.
 - Maintain a safe work environment that promotes mental and physical health and compliance with all relevant health and safety regulations. This will include the usage of Kyowa Kirin premises and the interactions with any people authorized to access the property.
 - Prevent the use or possession and distribution of illegal drugs on the property associated with the business practices of Kyowa Kirin.
 - Prohibit the use of forced labor in any facilities or properties associated with the business operations of Kyowa Kirin.
 - Comply with the local minimum working age and at no time be party to child labor practices or exploitive labor practices.
 - Maintain clear written employment information for all employees that define remuneration, deductions, and terms of employment. This employment documentation should also clearly define the disciplinary actions and procedures that will govern the interactions between employer and employee.
 - Maintain proper employment records in accordance with local regulations and legislation.

Sustainability

- Kyowa Kirin believes in living up to a higher standard of social responsibility and sustainability. We are constantly striving to live up to our stewardship of the environment and this is extended to all our

External Providers and their business practices. Kyowa Kirin and External Provider will always work on finding better ways of fulfilling the commitment to the environment and business sustainability.

Code of conduct compliance

- It is the responsibility of the External Provider and its company officers to ensure that all employees and their representatives comply with the Code of Conduct contained within this document. Any transgression or violation of these policies must be reported to Kyowa Kirin to prevent damage to the business relationship with Kyowa Kirin clients and supply chain. In the event of a violation Kyowa Kirin reserves the right to request the move removal of persons or persons that committed the transgression, and in this regard, Kyowa Kirin reserves the right to conduct audits to evaluate the compliance at its discretion.

Breach of conduct

- Any breach of conduct must be reported to the relative Kyowa Kirin North America office as soon as possible or to the Kyowa Kirin North America Online report intake portal. Reports to the portal may be made anonymously:
 - 1-877-295-7937 or <https://kyowakirinusa.ethicspoint.com/>