

# Anti-Corruption Policy

Expected to update: [1<sup>st</sup> Feb. 2024]

JCR Pharmaceuticals Co., Ltd. and its subsidiaries and associates (hereinafter collectively, the "JCR Group" or "we") conducts to prevent corruption in all its forms and to promote its compliance globally.

## 1. Compliance with laws and regulations

The JCR Group strictly adheres to all applicable anti-corruption laws and regulations in all countries in which it operates and acts fairly and ethically in accordance with its internal rules and regulations.

## 2. Scope

This Policy applies to all directors, officers, and employees of the JCR Group, including external contractors working on behalf of the JCR Group (the "JCR Group Employees").

## 3. Definitions

Term	Definition
Anti-Corruption Laws	Includes criminal laws of each country and region, unfair competition laws, FCPA, Bribery Act 2010, Brazilian anti-corruption laws, etc. In addition to the laws and regulations of the countries and regions in which we operate, we include the laws and regulations of other countries and regions when they are applicable due to extraterritoriality.
Public Official	Public Official means any natural person who: <ul style="list-style-type: none"><li>● holds, whether elected or appointed, a legislative, administrative, or judicial position of any kind in any country, state, or territory, regardless of his or her position;</li><li>● performs public functions in any branch, agency or instrumentality of the national, federal or municipal government of any country, state or territory;</li><li>● performs public functions for any public agency or public enterprise of any country, state or territory; or</li><li>● is considered a public official or quasi-official in accordance with applicable laws.</li></ul>

Business partner	Natural persons and legal entities other than the JCR Group with whom the JCR Group has business relations or with whom the JCR Group has business contact (e.g., agents, consultants, healthcare professionals contractors, subcontractors, suppliers and vendors, sales agents, joint venture partners, professional associations, trade associations, natural persons or legal entities performing services for or on behalf of the JCR Group), excluding Public Official.
Internal Procedures for the Prevention of Corrupt Behavior	The JCR Compliance Policy, and all rules, procedures and standards of conduct relating to the prevention of corrupt practices of the JCR Group.

#### **4. Bribery**

The JCR Group must not offer, propose, promise or solicit, directly or indirectly, entertainment, gifts, money or any other bribes to any Public Official in Japan or abroad, in order to obtain or retain business benefits, to avoid disadvantages to itself or the JCR Group, or in return for such actions.

The JCR Group must not offer, promise, solicit or accept, directly or indirectly, any entertainment, gifts, money, or other bribes to its business partners, either in Japan or abroad, in an improper manner. In addition, we recognize that making payments to Public Official to facilitate or expedite procedures with the government is basically considered a type of bribe.

#### **5. Governance**

The JCR Group establishes a management system to promote the prevention of corrupt practices, as well as the Internal Procedures for the Prevention of Corrupt Behavior based on this Policy.

#### **6. Assessment and action**

The JCR Group identifies and assesses, as required and as appropriate, the risks of corrupt practices and takes necessary measures to prevent corrupt practices.

Before entering a transaction with a new third party, the JCR Group examines and evaluates, in consultation with the relevant departments, as necessary, for the purpose of preventing corrupt practices by the third party.

#### **7. Violation**

If any JCR Group Employees violates the Anti-Corruption Laws, this Policy, or the Internal Procedures for the Prevention of Corrupt Behavior, he/she will be subject to disciplinary action.

## **8. Continuous Improvement**

The JCR Group continuously inspects, reviews, and makes improvements to the efforts described in items 1 to 7 above.