

Global Anti-Bribery Policy (an excerpt)

1. Purpose

The Anti-Bribery Policy (“Policy”) intends to ensure that Chugai Pharmaceutical Co., Ltd. and its domestic and overseas subsidiaries (“Chugai Group”) avoid any acts related to bribery and conduct their business in an appropriate manner.

2. Basic Principles

(1) Compliance to Laws and Regulations

The directors, officers and employees of any company in the Chugai Group (“We”) shall comply with laws and regulations, industry standards, internal rules and any other applicable rules related to prevention of bribery and corruption in all countries and regions where the Chugai Group conducts its business activities.

(2) Prohibition of Providing a Bribe

We will not bribe any parties directly or through third parties (e.g., agents, agencies, consultants, contractors), irrespective of whether the party is a government official, public servant, or corporate personnel etc., and irrespective of whether it is a corporation or an individual. Any act that may raise concern in society regarding a potential bribe provided by the Chugai Group is also prohibited.

(3) Prohibition of Accepting a Bribe

We will maintain good faith and a fair attitude towards suppliers, and will not request or accept a bribe from the clients, customers, business partners or any others by taking advantage of our respective position in the respective company. Any acts that may raise concern in society regarding the potential acceptance of a bribe by the Chugai Group is also prohibited.

(4) Measures to Prevent Bribery

The Compliance Officer in each subsidiary of Chugai Pharmaceutical Co., Ltd. shall carry out the following preventive measures of bribery in cooperation with the Corporate Social Responsibility Department of Chugai Pharmaceutical Co., Ltd.:

- 1) Develop an “Anti-Bribery Guideline” based on the Policy, disseminate it to all employees of his/her own company, ensure implementation and adherence , and conduct periodic reviews
- 2) Implement monitoring related to bribery
- 3) Plan and implement education and training for anti-bribery
- 4) Provide an initial response to any event related to bribery, and develop measures to prevent reoccurrences
- 5) Respond appropriately to consultations or reports received through the internal hotline

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