

# Sawai Pharmaceutical Anti Bribery and Corruption Policy

Aiming to realize sustainable development of healthy society and economy, regulations are being tightened in countries all over the world on bribery, corruption or other forms of misconduct that could impede fair competition. As Sawai Pharmaceutical is engaged in pharmaceutical company with a deep relationship to people's lives, we believe that "a healthy society and its sustainable development" are the foundation of why we exist, and that we can achieve our sustainability only if we can maintain a solid relationship of trust with all stakeholders. To this end, we have established the Anti Bribery and Corruption Policy (hereinafter referred to as this "Policy").

## 1. Prohibition of bribery to Government Officials

No board members, corporate officers and employees of Sawai Pharmaceutical Co., Ltd. (hereinafter referred to as "Officers and Employees") shall provide, offer, or promise to provide any illicit money, bribes, entertainment, gifts, benefits, or other favors<sup>\*Note 1</sup> (hereinafter collectively referred to as "Improper Benefits") to public officers, public employees or persons in a position similar thereto, regardless of whether they are domestic or of foreign governments (hereinafter referred to as "Government Officials").

## 2. Prohibition of facilitation payment<sup>\*Note 2</sup>

Officers and Employees shall not pay facilitation payments in Japan or any other countries.

## 3. Business Partner<sup>\*Note 3</sup>

Officers and Employees shall not instruct, abet, or assist Business Partners to provide Improper Benefits (including facilitation payments, the same shall apply hereinafter) to Government Officials. We shall never overlook such behavior and shall refuse to pay any commissions or compensation to our Business Partners on such behaviors. In addition, before retaining a Business Partner, we shall make background check of the nominee to the extent practically possible, and request them to submit us a written pledge stipulating anti bribery and corruption provisions, or conclude a contract including such effect.

## 4. Request for bribery by Government Officials

Officers and Employees shall firmly refuse any request for Improper Benefits from any Government Officials, whether in Japan or any other countries, and shall notify such request to the our company's compliance officer, who shall notify appropriate authorities, if they deem it necessary.

## 5. Entertainment or gifts to other than Government Officials

Any entertainment, gifts, benefits, or other favors given to other than Government Officials in Japan or any other countries must be complied with the laws and in compliance with the socially accepted standards of each country.

6. Receiving Entertainment or gifts

Officers and Employees, whether in Japan or any other countries, shall never receive excessive entertainment or gifts along with their business beyond the ranges of social courtesy.

7. Prohibition of improper accounting

Officers and Employees shall not engage in off-balance-sheet transactions, fictitious transactions, other false transactions, or any transaction that may cause misunderstanding. In addition, for all transactions or processing of assets, we shall prepare and maintain accurate and fair accounting records such as books, records and account bills in a timely manner.

8. Education

Sawai Pharmaceutical shall implement education and training for Officers and Employees on anti bribery and corruption. The education and training shall be conducted according to the education and training plans to be established each fiscal year.

9. Periodic audits and reviews

Through periodic audits, Sawai Pharmaceutical shall examine compliance with this Policy and the internal regulations in terms of the prevention of bribery and corruption, and shall confirm whether the internal system for the prevention of bribery and corruption works effectively. Based on the results of the audits, Sawai Pharmaceutical shall continuously review the effectiveness of such anti bribery and corruption system, including this Policy, and shall make improvements as necessary.

10. Disciplinary Action

Sawai Pharmaceutical shall take strict disciplinary action against Officers and Employees who violate this Policy and the internal rules in terms of the prevention of bribery and corruption.

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※Note 1: Examples of improper benefits or other favors

Cash vouchers, gift cards, invitations (professional sporting events, theatrical performances, travel, etc.), donation and employment opportunities (including those for relatives)

※Note 2: Facility payments refer to small payments made to low-ranking Government Officials without discretionary authority in order to facilitate and expedite routine administrative procedures. Facility payments are prohibited in many countries as bribery because they may interfere with the efficient operation of government agencies, thereby undermining economic development and the rule of law.

※Note 3: “Business Partner(s)” means all third parties, regardless of their names, including delegates, advisors, consultants, brokers, agents, collaborators, and joint ventures (JVs), which we may use

for the purpose of facilitating transactions and operations and which are reasonably likely to come into contact with Government Officials. Contracts with Business Partners must contain provisions prohibiting them from providing Improper Benefits to Government Officials and conditions under which the Contracts may be terminated in the event of violation of such provisions, in order to prevent bribery through Business Partners.

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Supplementary Provisions

This Policy shall be under the jurisdiction of Vice President of Corporate Administration Division of Sawai Pharmaceutical.

The amendment and repeal of this Policy shall require the resolution of the Sawai Pharmaceutical Board of Directors.

Enacted on June 18, 2018

Amended on February 27, 2023 and enforced on April 1, 2023