

# **Linical Code of Conduct**

## **Principles**

### **1. Compliance with laws, regulations and social norms**

#### **Basic policy**

We are thoroughly committed to conducting business based on our management philosophy, complying with relevant laws, regulations and social norms, and fulfilling our societal responsibilities as required by our local communities and their residents.

#### **Code of practice**

In the operation of our business, our employees understand our societal responsibilities as required by our local communities and their residents, and are fully aware that ensuring the practice of our management philosophy enhances the social value of the company. Our employees are also vigilant in complying with laws, regulations and codes governing the operation of our business, to ensure our corporate governance functions adequately. We have established a business audit committee to ensure our Code of Conduct and these policies are maintained at the highest level, in conformance with our management philosophy.

### **2. Preventing corporate conflicts of interest**

#### **Basic policy**

We make business decisions only with the full information, and with the awareness that the decision must be what is best for the company.

#### **Code of practice**

Our employees confirm that the following conditions have been satisfied when performing their duties.

- Compliant with relevant laws and regulations
- Within the authority granted by the company
- Not affected by personal interests
- There is sufficient information on which to base a decision

### **3. Whistleblowing**

#### **Basic policy**

To ensure employees can report any internal dishonesty, information leaks or other actions that may have a negative impact on society, we work to build an environment that makes such reporting easier for the whistleblower, and to correct and prevent any recurrence of such events or actions.

#### **Code of practice**

In the event any employee knows of any action in breach of, or that may possibly be in breach of our Code of Conduct, he or she must take action in accordance with our internal manual for whistleblowing. In such cases, the person coming forward with such information will suffer no penalty for doing so.

## **Business Activities**

### **1. Treatment of medical institution staff and subjects**

#### **Basic policy**

We comply with all laws, regulations and social norms, as well as with internal regulations and rules. Identifying with medical institution staff and subjects as we do, our first priority is on ethics, and we work hard to ensure that clinical trials are conducted appropriately.

#### **Code of practice**

Our employees work hard to faithfully execute appropriate clinical trials as they deal with all members of the medical institution staff and the trial subjects. Identifying, as we do, with medical institution staff and subjects, we place our first priority on ethical conduct, and we intend that all clinical trials be conducted appropriately. To accomplish this, we comply with all relevant laws and regulations and promote our monitoring activities in accordance with sound social custom and common social practices. We also follow best practices to prevent the occurrence of any accidents or problems regarding the clinical trial drugs, the medical institution staff and the subjects. In the event of an accident or problem, we put the safety of the subjects first, and take immediate and appropriate action. We also do our utmost to prevent the escalation of any such accident or problem.

### **2. Treatment of our customers**

#### **Basic policy**

We comply with the business procedures stipulated by all laws and regulations. We are committed to pursuing the pharmaceuticals development businesses and performing clinical trials properly within a relationship of fair trade.

#### **Code of practice**

Our employees conduct themselves toward all of our customers with a fair and courteous attitude, and always respond faithfully to the customer's requirements. Our employees comply with all related laws, regulations and rules, and establish and maintain relationships that are profitable for both the customer and ourselves, in keeping with sound business practices. Our employees will not accept any personal benefit from any customer, in any form.

### **3. Promotion of fair trade**

#### **Basic policy**

In our trade activities, we comply with laws, regulations and rules intended to prevent private monopolies and to ensure fair trade.

#### **Code of practice**

In order to prevent any problems with establishing business contracts, our employees will clearly indicate the terms before the start of negotiations, and will not present any information in our sales materials that might cause a misunderstanding.

## **4. Managing corporate confidentiality**

### **Basic policy**

We classify information created and/or obtained during our business activities in terms of its importance, and manage important information strictly and properly. We also manage the information of third parties (medical institutions staff, subjects and customers) collected and/or used by us, and information deposited by them, with the same care and discretion as we handle our own information.

### **Code of practice**

In accordance with internal administrative rules, our employees make every effort to prevent information leaks. When information must be disclosed internally, that disclosure follows a set deadline. We do not use any disclosed information for purposes other than those for which it was originally disclosed, nor will we attempt to obtain information through deceit or dishonesty.

## **Social Responsibility**

### **1. Respecting human rights and individuality**

#### **Basic policy**

We respect the human rights and the individuality of all those having any contact with our company, including medical staff, subjects, customers, residents of our local communities and our employees. Under no circumstances do we permit any type of discrimination or harassment, or allow such actions to be overlooked.

#### **Code of practice**

In the conduct of our development activities, our employees respect the human rights of the medical staff, subjects, customers, and people in the community at large. We respect basic individual human rights and do not discriminate in unreasonable ways unrelated to the performance of our business, such as regarding social status, resources, race, creed or gender. At the same time, we permit no discriminatory actions or harassment by our employees. We will handle with utmost care any information that relates to privacy, such as internal personal information, to ensure such information is not infringed upon. We take appropriate action, including through various educational programs, to improve our understanding and recognition of the issues of preserving basic human rights and the protection of various rights derived from them.

### **2. Employment and working environment**

#### **Basic policy**

Hiring, transfer and promotions are based on fair and equitable standards without discrimination, ensuring a work environment that will enable each employee to fully expand their capabilities, and in which employees respect one another and can enjoy a workplace free of discrimination or harassment. We also cultivate a lively corporate culture. We aim to create a comfortable, safe and clean working environment, and work to provide employees mental and physical space and enriching surroundings.

#### **Code of practice**

Our employees strive to maintain safe and sanitary company facilities and offices. To accomplish this, we work on a day-to-day basis to put in place the safety and sanitary measures required in our buildings and facilities. Our employees comply with all work standards that emphasize safety, sanitation and good health.

### **3. Relationships with local communities and society**

#### **Basic policy**

We take responsibility for our local communities and society by involving ourselves, cooperating with them, and maintaining good neighborly relationships. We also support the creation of an enriching living environment and contribute to society through appropriate donations, with consideration for the social and public aspects of the activities involved.

#### **Code of practice**

Our employees actively participate in community and social activities, and make efforts to ensure that people in our local communities and society at large understand our management policies and business activities. That is why we work to fulfill our social responsibilities through appropriate social contributions, donations and other efforts, thus enhancing our social value as a company. When opening new offices, we give full consideration to the surrounding environment, and work proactively to address problems involving traffic, parking, noise and offensive odors, etc., so that we might build good relationships with our neighbors. We have nothing to do with any anti-social forces or organizations that threaten the social order or the safety of the populace. Indeed, we are firm in our opposition to such pressures, and work to exclude them when they are encountered.