



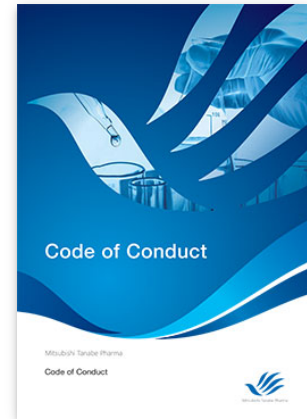
Management

Code of Conduct

Targeting the realization of MISSION and VISION 30, we have formulated the Code of Conduct as a guide to behavior based on the Corporate Behavior Charter and the Declaration of Compliance.

This code demonstrates fundamental approaches and detailed action guidelines for each business activity, and accordingly, in addition to Japanese we have also prepared English and Chinese versions and made them available on the corporate web site.

> [Code of Conduct](#)





Respect for Human Rights

Basic Stance on Human Rights

The Mitsubishi Chemical Group (the MCG Group) has established the [Global Policy on Respecting Human Rights, Employment and Labor \[PDF : 140KB\]](#) in accordance with the following international norms.

<International norms to which we comply>

- Universal Declaration of Human Rights
- Declaration on Fundamental Principles and Rights at Work (International Labor Organization)
- Global Compact (United Nations)
- Guiding Principles on Business and Human Rights (United Nations)

Additionally, the Mitsubishi Chemical Group Charter of Corporate Behavior features a section on “Respecting Human Rights,” which states that we must respect the dignity and rights of all people without engaging in unfair discrimination on the basis of race, gender, religion, or any other reason.

In Japan, the Group’s corporate intranet hosts a human Rights section in the Compliance Guidebook that all employees in the domestic Group can view, which clearly states our respect for the personalities and human rights of every individual, along with our intention to create a psychologically safe workplace. Moreover, this section clearly states that employees shall not treat people unfairly on the basis of gender, age, nationality, race, ideology, creed, religion, education, origin, disease, disability, sexual orientation/gender identity (including LGBTQ+*) and shall not engage in harassment or discrimination, or other behavior that impinge on their character or human rights.

In addition, we share the “[Developing Cooperative Business Practices with Suppliers and Business Partners - Guidebook \[PDF : 451KB\]](#) ” with our suppliers and also conduct surveys to deepen their understanding with regard to human rights.

> Establishing a Sustainable Supply Chain

* LGBTQ+: In this report, LGBT is used as a generic term to refer to people who belong to a sexual minority, with the addition of Q (Questioning: people who have not decided on or do not know their own identity) and “+” as an expression of sexual diversity, which cannot be expressed in words.

Human Rights Awareness Promotion Structure

Based on “Respect for Human Rights” written in the Mitsubishi Chemical Group Charter of Corporate Behavior, the Group has instituted the Regulations for Promoting Awareness of Human Rights to establish a system for promoting human rights awareness activities as well as basic points for human rights training in the domestic Group. Based on these regulations, we have established the Human Rights Awareness Promotion Committee, chaired by the Representative Director, as a deliberative body for the planning and promotion of companywide human rights awareness policies. Furthermore, headquarters committee members, department committee members, and regional committee members play a key role in holding in-house training for officers and employees, and promoting awareness of human rights and diversity.



Human Rights Awareness Training

The Human Rights Awareness Promotion Committee Secretariat formulates the annual plan for human rights awareness training, the Chairman of the Human Rights Awareness Promotion Committee and headquarters committee members approve the plan, which is then carried out. In fiscal 2022, we held training for new employees covering human rights in general, and at each workplace in the domestic Group held readings of the important sections of the “Harassment Prevention Guidebook” created in-house, in an effort to deepen employee understanding of harassment prevention, consulting services, and other issues.

Regional members systematically participated in external training courses organized by outside human rights-related organizations of which the Company is a member.

Diversity & Human Rights Slogan Contest

In anticipation of Human Rights Week in December each year, the Group encourages employees to submit diversity and human rights slogans. In this way, the Group is working to enhance human rights awareness.

In fiscal 2022, employees at 13 Group companies in North America, Europe, Asia, the Middle East, and Japan submitted 654 slogans. The members of the Human Rights Awareness Promotion Committee selected Global Best Award slogans from among the Local Best Award slogans chosen by each Group company based on originality, ease of understanding, and educational effects under the theme of “Diversity and Human Rights.”

The award-winning slogan will be used at various MTPC Group-organized events.

Global Best Award-winning slogan: “Value your own values Respect the other person's values”

Winner: Naoya Hiraiwa (Yoshitomi Plant, Mitsubishi Tanabe Pharma Factory)

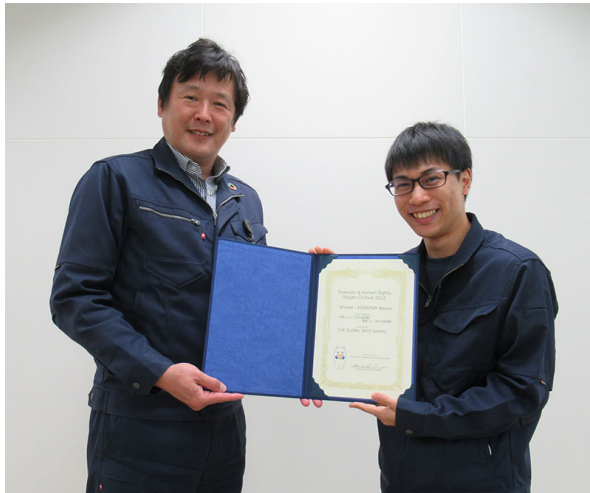
Slogan Thoughts

I am delighted to have been chosen to receive the Global Best Award.

My slogan expressed my wish for a society where there are as many ways of thinking as there are people, and where all can coexist without being denied, as well as my belief that my ideas are an important element in diversity, and that we should accept the existence of ideas other than our own, rather than disparaging them. I hope for a world in which all people can live in peace with a positive perception of their own identity.

Winner of the Excellence Award in the Human Rights Slogan Competition of a Human Rights Enlightenment Organization

This slogan received the Excellence Award in the 2022 Human Rights Slogan Contest of a Human Rights Enlightenment Organization, of which we are a member.



Naoya Hiraiwa (photograph, at Right), and Yusuke Furuse, manager of the Yoshitomi Plant (at left)

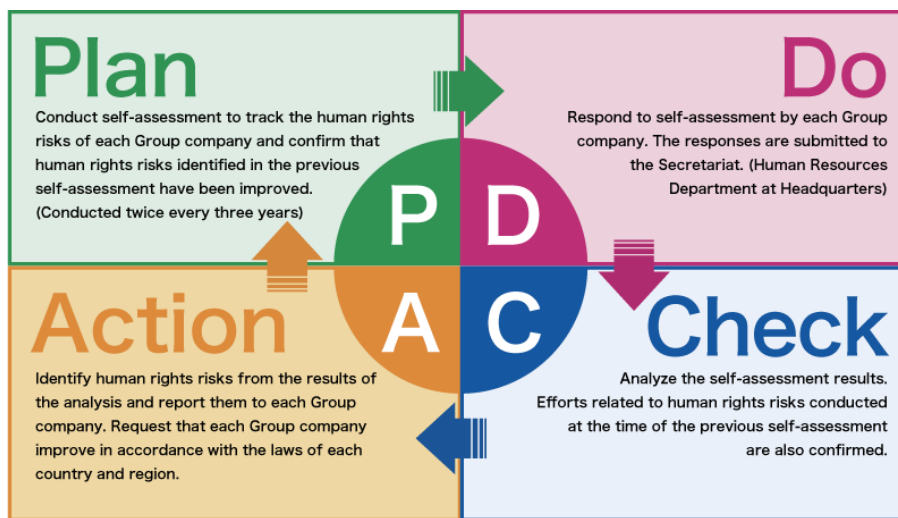
Human Rights Due Diligence*

The Group conducts its business activities in accordance with the laws and regulations of each country and region, and the rules of each company. In this way, we are working to ensure that we do not engage in or participate in violations of human rights. In the unlikely event that a human rights violation is discovered, we work to quickly resolve the problem.

In fiscal 2022, we conducted a self-assessment of human rights, targeting the Group (including our overseas offices). The purpose of conducting this assessment was to track human rights risks at each company and to confirm that the human rights risks identified in the previous self-assessment have been improved. We collected responses from each company and compared and evaluated the results with reference to those obtained in the previous assessment, which confirmed that our efforts are improving.

* Human rights due diligence is the process of identifying, preventing, and mitigating adverse impacts related to human rights.

Human Rights Due Diligence Process



Human Rights Considerations in Hiring

In the Group's employment selection, we have set a basic policy to respect basic human rights and to conduct selection fairly based on experience, ability, aptitude, and interest, without regard to nationality, place of birth, gender, sexual orientation, gender identity, family situation, beliefs or other factors that are unrelated to the applicant's aptitude or ability.

In the selection process, we conduct fair employment screening based on the applicant's aptitude and ability and do not ask inappropriate questions that may violate one's human rights. Furthermore, one is not required to indicate gender on the job application form for new graduates or the internship application form for students.



Management

R&D Ethics

Ethical Considerations in Animal Experiments at the Research Stage

In pharmaceutical research and development, animal experiments may be necessary and are the only means of confirming efficacy and safety as pharmaceuticals. However, animal experiments involve sacrificing the lives and bodies of animals, and thus it is essential to take ethics into consideration. Mitsubishi Tanabe Pharma has formulated “Guidelines for Proper Conduct of Animal Experiments” and complies with relevant laws, regulations, and guidelines, etc., giving due consideration to animal welfare with reference to all animal experiments. Our policies and the status of our initiatives is included in “Information Disclosure on Animal Experiments.”

All employees will remind themselves that drug discovery is founded on a respect for all life, and continue to contribute to the welfare of animals and people.

Ethics Review Committee Initiatives

Discovery research using samples provided by patients, such as human tissue and cells, as well as information, such as treatment information, is increasingly important in the discovery of more-effective, safe drugs. In implementing this type of research, it is essential to pay careful attention to ethical issues, such as the receipt of appropriate informed consent, reduced burden on research subjects, and the protection of personal information.

The Mitsubishi Chemical Group (the MCG Group) has established the MCG Human Tissue Research Ethics Review Committee as an ethics review committee in conformance with the Ethical Guidelines for Life Sciences and Medical and Health Research Involving Human Subjects (Ministry of Education, Culture, Sports, Science and Technology (MEXT); Ministry of Health, Labour and Welfare (MHLW); Ministry of Economy, Trade and Industry (METI)). This committee carefully reviews the ethical appropriateness and scientific rationality of research protocols. To promote objectivity and impartiality in these reviews, outside members are included to ensure that respect is given to a range of opinions and to facilitate appropriate reviews. To ensure full transparency, the Company posts the committee membership list, the rules governing the committee, and summaries of its proceedings on the research ethics committee reporting system established by MHLW.

Human Rights and Bioethical Considerations in Clinical Trials

All Mitsubishi Tanabe Pharma clinical trials are subject to strict standards. The Company follows the guidelines set by the International Council of Harmonization of Technical Requirements for Pharmaceuticals for Human Use/Good Clinical Practices (ICH-GCP), based on the Declaration of Helsinki. It also upholds the laws and regulations of the country in which the studies are conducted, as well as its own standards and clinical trial protocols. All volunteer trial subjects give their informed consent to do so. The Company's highest priority is to ensure the safety of its trial subjects, protect their human rights, and safeguard and improve their personal welfare.

Mitsubishi Tanabe Pharma Clinical Trial Protocol Review Committee includes members from outside the Company and medical experts who are well-versed in clinical trial ethics. Before a trial is allowed to begin, the committee investigates the proposed study to confirm its ethical and its scientific validity.

In addition, the Company's clinical trial management system is used to verify that studies are being properly administered, and we have established a system to ensure that the trial data is reliable.



Management

Compliance

Compliance Promotion Structure

The Mitsubishi Tanabe Pharma Group is united in its efforts to practice and promote compliance with the Mitsubishi Chemical Group (the MCG Group) based on the "One Company, One Team" system.

For details, see the Mitsubishi Chemical Group Corporation (MCG) website.

Compliance

<https://www.mcgc.com/english/group/compliance.html>

Corporate Behavior Charter Day

After factoring in the gravity of the Medway Issue and the related quality control problems, (a violation of the Pharmaceutical Affairs Act and GMP ministerial ordinance), and recognizing the need to prevent any further incidents of misconduct, the Mitsubishi Tanabe Pharma Group has introduced an annual Corporate Behavior Charter Day, which offers employees the opportunity to review the Group's Charter and reflect on their individual conduct.

In fiscal 2022, we invited an outside lecturer for another "Compliance Lecture" held remotely, which focused on the subject of "Future-orientation—Establishing compliance by seeking to attain better things." The lecture was well-attended, with a lively question and answer session on the day, and also offered for on-demand viewing, where it has been viewed by many employees.

Compliance meetings are held annually at all worksites in Japan, focusing on exchanges of opinions, employees read the Compliance Guidebook together, and sign pledges in which they vow to conduct themselves in accordance with the Corporate Behavior Charter and the Compliance Guidebook. We also held compliance meetings at overseas Group companies by including local content in the corresponding content used in Japan.

Addressing Harassment

The MCG Group has established a section on “Respecting Human Rights” in its Charter of Corporate Behavior. This makes a clear declaration that we will respect each other’s human rights, and work to create safe, comfortable working environments. The Compliance Guidebook, which can be viewed on the corporate intranet by all employees of the domestic Group, states clearly that the Group will not tolerate acts that violate human rights or prevent people from exercising their abilities, such as discrimination or harassment, or the use of power to force subordinate employees to engage in excessive work (sexual harassment, power harassment, etc.)

Additionally, in November 2022, the Group released a “Message on Prohibition of Harassment” under the name of the manager of the Japan Human Resources Department, directed to all employees of the company’s domestic Group. This message was a clear statement of the company’s stance of prohibiting harassment. Moreover, the “Harassment Prevention Guidebook” released in 2018 was revised in January 2023, with the addition of the aforementioned “Message on Prohibition of Harassment,” and other content enhanced and restated.

We believe that eliminating harassment will result in the creation of comfortable workplaces, and in turn lead to the vitalization and success of the corporate group.

Protecting Customer Privacy

Mitsubishi Tanabe Pharma is committed to protecting its customers' personal information. In keeping with its strong sense of responsibility regarding this subject, the Company has released its [Privacy Policy: Personal Information Protection Policy](#) to the public. Toward this end, the Company uses only fair and reasonable methods to collect customers' personal information and utilizes this information only to the extent necessary to achieve the permitted purpose. In addition to this fundamental approach, it has taken the following initiatives with regard to the handling of personal information.

- (1) Established and revised defined regulations regarding the protection of personal information
- (2) Issued and revised the Personal Information Leak Prevention Manual
- (3) Built a management system for personal information protection, including the appointment of division managers and personnel who handle personal information
- (4) Educated and trained employees; supervised and audited subcontractors
- (5) Implemented robust data encryption and security measures on IT equipment (computers and cellular phones) owned by the company



Management

Risk Management

Risk Management Associated with Business Activities

Working from a “One Company, One Team,” system, the Mitsubishi Tanabe Pharma Group is engaged in ERM (Enterprise Risk Management) activities to allow the Mitsubishi Chemical Group (the MCG Group) to ensure sound management based on the “Mitsubishi Chemical Group/ERM Basic Regulations.”

For details, see the Mitsubishi Chemical Group Corporation (MCG) website.

https://www.mcgc.com/english/group/risk_management.html

Crisis Management

The Group has conducted a review of its Business Continuity Plan (BCP) and systems to ensure the continued stable supply of pharmaceuticals to patients in case of a major earthquake such as a Nankai Trough earthquake or a Tokyo inland earthquake predicted to strike in the future. Additionally, the Group has implemented information sharing systems intended to gather information in the event of a disaster. We are improving our practical skills by conducting initial information gathering training and safety confirmation drills. We are also advancing countermeasures in case of a disaster, including one that affects the supply chain, by examining the countermeasures of our business partners.

Information Security

The Company participates in the Information Security Executive Committee, an MCG Group organization.

Main roles of the Information Security Execution Committee

- Identification of information security risks and formulation of response plans
- Establishment of rules and implementation of countermeasures
- Responses to information security incidents
- Monitoring of the implementation status of measures and compliance with associated rules and regulations

Furthermore, in response to overseas business expansion and the increasing complexity of IT infrastructure, the Group will implement measures to ensure the safe and stable use of information and data communications technologies through surveys on security maturity at overseas bases, and enhancing security checks when using network security and cloud services. We are also taking steps to improve security, including that of our supply chain, by checking our business partner’s security.

In preparation for damage mitigation and early recovery in the event of an incident, we are examining our response system and flow in conformity with the above incident prevention measures.

Leakage of personal information

The leakage of personal information not only harms third parties but could also seriously damage the credibility of the Company and cause irreparable loss.

The Group will comply with GDPR* and other personal information-related laws and regulations and re-examine its rules to strictly manage information in line with the overseas expansion of the Group.

* The EU's General Data Protection Regulation (GDPR). A new personal information protection framework instituted by the European Parliament, European Council and European Commission.

Support for remote work

We are constructing a new network environment with the goal of improving convenience and ensuring security for remote work, which has taken hold as a new way of working.

[Protecting customer privacy](#)



Promotion of Fair Operating Practices

Initiatives for Fair Business Practices

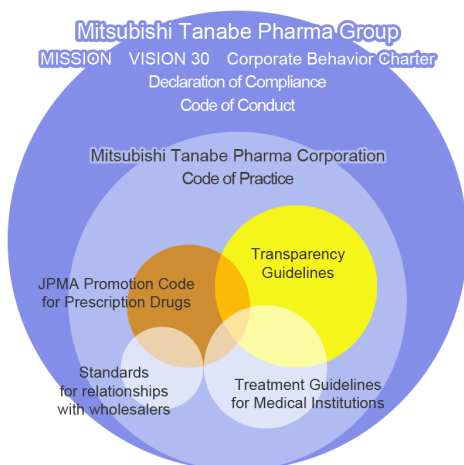
The Corporate Behavior Charter of the Group states that we will strive to maintain high ethical standards and place priority on fairness and integrity in all activities. In addition, the Declaration of Compliance expresses our commitment to conducting transactions in a fair manner based on open competition in the market, giving consideration in transaction relationships not only to laws and regulations but also to social standards, and to maintaining healthy and proper relationships with government and administrative entities while strictly refusing any relationships with antisocial forces. Specifically, based on the [Code of Conduct](#), we formulated the Mitsubishi Tanabe Pharma Corporation Code of Practice, which is described in the following section, and each activity is conducted in strict observance of the following independent standards.

- Promotion Code
- Transparency Guidelines
- Global Policy for the Prevention of Bribery and Corruption
- Guidelines for Activities to Provide Sales Information on Ethical Drugs
- Treatment Guidelines for Medical Institutions

Code of Practice

The Japan Pharmaceutical Manufacturers Association (JPMA), of which Mitsubishi Tanabe Pharma is a member company, put the JPMA Code of Practice into effect in 2013. This establishes behavioral standards that must be observed by the executives and employees of the member companies in their interactions with researchers, healthcare professionals, patient organizations, wholesalers, etc. In response, the Company established and put into effect the Mitsubishi Tanabe Pharma Corporation Code of Practice. All executives and employees of the Company and Group companies in Japan are required to follow this code not only in promotion endeavors designed for healthcare professionals, medical institutions, and others, but also in all other corporate activities, including testing and R&D, information provision activities, cooperation with patient organizations, and relationships with wholesalers. Overseas Group companies comply with the codes of each country based on the International Federation of Pharmaceutical Manufacturers and Associations' Code of Practice (IFPMA Code).

Positioning of the Code of Practice



- Applicable to all Company executives and employees
- Officers and employees of Group companies must also comply with this code
- Must be followed in promotion activities and all other corporate activities
- Must comply with Guidelines for Activities to Provide Sales Information on Ethical Drugs
- Must respond to issues dealing with the Fair Competition Code of the Ethical Pharmaceutical Drugs Marketing Industry

Appropriate Promotion Activities Initiatives

Definition of Promotion

In the Japan Pharmaceutical Manufacturers Association’s Code of Practice (JPMA Code), for a pharmaceutical company, the word “promotion” as it is used here does not refer to “sales promotion.” Rather, it means “to engage with healthcare professionals in the provision, collection, and communication of drug information and promote the proper use and adoption of prescription drugs on the basis of those interactions.”

Pursuing Promotional Activities

The Promotion Code for Prescription Drugs, which is a part of the JPMA code of practice, describes details of promotions conducted by member companies. In accordance with the intent of the Promotion Code, we established the Mitsubishi Tanabe Pharma Promotion Code for Prescription Drugs to promote the appropriate use and dissemination of prescription drugs.

Additionally, following the application of the Guidelines for Provision of Sales Information on Prescription Drugs, which sets forth a standard for appropriate sales information provision activities for ethical drugs by the Ministry of Health, Labour and Welfare, we added an advisory function to the Appropriate Supervisory Committee, which until now had been an advisory body for creating promotional materials, and for sales information provision activities to promote the proper use of ethical pharmaceutical drugs.

Further, for lectures that serve as opportunities to promote ethical drugs, we create booklets to explain lecture standards for presenters and carefully explain these standards to presenters in advance, thus ensuring the appropriateness of lectures at the Mitsubishi Tanabe Pharma Group.

Ensuring Transparency

The aim of the Japan Fair Trade Council of the Medical Devices Industry is to restrict unjustifiable premiums, such as money, goods, services, etc., provided as an inducement to engage in transactions to ensure fair competition among businesses. The council has its legal basis in the Act against Unjustifiable Premiums and Misleading Representations.

Accordingly, we have established Treatment Guidelines for Medical Institutions to prevent the distortion of proper prescription drugs use and unjustifiable customer inducements and increase the transparency of transactions by restricting the provision of unjustifiable premiums.

Audit System

In January 2021, we established the Promotion Audit Department to promote our initiatives for proper promotion activities, and improved our systems.

Initiatives Related to Transparency with Medical Institutions and Patient Organizations

Initiatives Related to Medical Institutions

To support not only the discovery of innovative drugs but also the provision and collection of information for the purpose of appropriate drug usage, collaboration and alliances among pharmaceutical companies, universities, and medical institutions are indispensable. However, as these alliance activities become more common, there are increasing opportunities for medical institutions and healthcare professionals to be significantly involved with specific companies or products, and there could be concerns about the extent to which the judgment of both is influenced by this situation.

Formulation of guidelines

In July 2011, the Company formulated its guidelines for transparency in relationships with medical institutions. The purpose of these initiatives is to secure a broad understanding from society regarding the contribution made by the Company's business activities to progress in medicine, pharmacology, and the other life sciences as well as the Company's high ethical standards in its business activities.

Information disclosure

The record of payments to medical institutions by the Group has been disclosed on the Company's website since fiscal 2012. From fiscal 2019, information has been disclosed in compliance with the Clinical Trials Act. Regarding the provision of compensation or funds to doctors or to healthcare related institutions or organizations in Europe or the U.S., we are conducting information disclosure in an appropriate manner in accordance with guidelines and laws formulated in Europe and the U.S.

Management structure

In August 2014, the Company formulated guidelines for managing conflicts of interest with medical and research institutions. We have established principles for avoiding problems with conflicts of interest and a system for managing conflicts of interest, and we are working to operate this system in an appropriate manner.

Initiatives Related to Patient Organizations

First, it is important for corporate activities to be based on a high level of ethical standards and mutual understanding with respect for the independence of patient organizations. On that basis, to secure a broad understanding from society regarding our contribution to the activities and development of patient organizations, in April 2013, we formulated our guidelines for transparency in relationships with patient organizations. Since fiscal 2013, information regarding the funds and labor provided to these patient organizations is disclosed on the Company's website.

Initiatives to Prevent Bribery and Corruption

Bribery and corruption in business not only hinder proper commercial transactions, but they can also have harmful effects, such as serving as the source of funding for anti-social forces. Recently, regulations for bribery and corrupt practices are being reinforced in countries around the world.

The Group has established the “[Mitsubishi Tanabe Pharma Group Global Anti-Bribery and Corruption Policy](#),” which applies to all Group companies, with the aim of further strengthening its approach toward prevention of bribery and corrupt practices.

The Group declared in the Policy that it will take a “zero-tolerance approach” to bribery and corrupt practices, and promised that it will not engage in bribery or corrupt practices. The Group also stated it will establish and operate an in-house system to eradicate bribery and corrupt practices.

Moreover, to further clarify the content of this policy, we formulated relevant guidelines for countries and regions where risks are thought to be particularly high, and we are implementing appropriate responses in line with the laws, regulations, and business practices of each country.

Dealing with Antisocial Forces

In accordance with rules for the elimination of crime syndicates, the Group’s basic policies regarding corporate extortionists, crime syndicates, and other antisocial forces are to not fear them, to not provide any funds to them, and to shun all contact with them. Therefore, we have taken the initiative to constantly gather information on antisocial forces and verify our business partners in cooperation with specialized external institutions such as the police. In the face of unreasonable demands, the Group will respond with a resolute stance that is unyielding and uncompromising. Moreover, officers and employees in their day-to-day business activities, must consistently avoid relationships with antisocial forces, adhere strictly to relevant laws and ordinances, and act in accordance with social ethics.

Protection of Intellectual Property Rights

Under its philosophy of contributing to the healthier lives of people around the world through the creation of pharmaceuticals, the Group has established an intellectual property policy as a basis for providing new medical opportunities and to protect and make effective use of its globally competitive intellectual properties.

In addition to filing, acquiring, and maintaining intellectual property rights including patents and trademarks, we promote an intellectual property strategy that is integrated with our business and R&D strategies, and work to ensure our rights not only at the initial research stage, but also at the appropriate time tailored to the product lifecycle. As a result, the Group held 1,015 registered patents as of March 31, 2023.

Furthermore, the Company respects third-party valid intellectual property rights by managing intellectual property risks through investigation into the rights of third parties. At the same time, we are working to create a system to protect and utilize our intellectual property by taking legal action and other measures, depending on the situation, in case a third party infringes upon our intellectual property rights.

In principle, the Group does not enforce its patent rights in the Least Developed Countries (LDCs) stipulated by the United Nations in order to contribute to healthcare access in economically deprived areas around the world.