

Enacted: 26th May, 2017

Kyowa Hakko Kirin Group Transparency Policy for the Relationships between Corporate Activities, Healthcare Professionals, Healthcare Organizations and Patient Organizations

We at the Kyowa Hakko Kirin Group (hereafter referred to as “KHK” and/or “Our Group”) strive to become a corporate group that is trusted by society through behavior based on high ethical standards and thereby fulfill our management philosophy, “Our Group strives to contribute to the health and well-being of people around the world by creating new value through the pursuit of advances in life sciences and technologies.” Toward this end, we have enacted “[Kyowa Hakko Kirin Group Compliance Policy](#)” with which all directors and employees of Our Group must comply, and have published it on our website.

Our Group collaborates with medical personnel and institutions (hereafter referred to collectively as “the Medical Community”) in pursuit of innovative drug discovery, regulatory activities and the subsequent launch of new products. In recent years, the scope of our business activities has expanded to patient organizations as we seek to facilitate patient-participatory medical care. We believe that these relationships are an indispensable contribution to public health and wellbeing.

In the process of such collaborations, conflicts of interest may arise among Our Group, the Medical Community and patient organizations. Therefore, Our Group should recognize and consider the independence of the Medical Community and patient organizations to avoid such conflicts.

Our Group is committed to acting in an ethical and transparent manner, including in relation to the public disclosure of information on the provision of funding to the Medical Community and patient organizations (hereafter referred to as “Transparency”).

Based on the above background, Our Group will ensure Transparency in our relationships with the Medical Community and patient organizations in line with the following policy:

1. The directors and employees of Our Group will act in the best interests of patients in accordance with high ethical standards complying with “Kyowa Hakko Kirin Group Compliance Policy” in our interactions with the Medical Community and patient organizations;

2. Our Group will disclose information on the transfer of values to the Medical Community and patient organizations in countries where we operate, while complying with the related laws, guidelines and industry codes for Transparency, including, but not limited to, the “Transparency Guideline for the Relationship between Corporate Activities and Medical Institutions” (Japan Pharmaceutical Manufacturers Association), “Transparency Guideline for the Relationship between Corporate Activities and Medical Institutions” (Japan Association of Clinical Reagents Industries), “European Federation of Pharmaceutical Industries and Associations (EFPIA) Disclosure Code,” “EFPIA Patient Organisation Code” and US Sunshine Act; and

3. Our Group will establish and operate appropriate organizational structures and business processes at each group company to ensure timely and accurate disclosure in accordance with the above applicable laws, guidelines and industry codes.

End