

## **SRD Group Compliance Policy**

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We consider ensuring compliance is one of the most important issues for management, and have prepared “SRD Group Compliance Policy” and “SRD Group Code of Conduct”, which have been disclosed and made known to all officers and employees.

By complying with relevant laws and regulations and internal rules applicable to us, we promise to fulfill our social responsibilities as a corporate citizen and to carry out fair and transparent corporate activities in accordance with social norms and business ethics.

### **Compliance System**

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Under the supervision of General Manager of Compliance, we strive to promote compliance, improve social credibility and minimize risks and losses in order to realize our management philosophy.

### **Establishment of Internal Reporting Desk**

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We have set up an internal reporting desk based on "Rules for Internal Reporting". Not only accepts issues related to legal compliance, the desk also accepts request related to daily work environment from all officers and employees. While protecting the person who reported to, the desk investigates to solve such issues.

### **Regular Compliance Training**

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We regularly conduct compliance training for all officers and employees, so that each and every one of them can have "the spirit of righteousness", and realize sound company management.

## SRD Group Code of Conduct

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We have established "SRD Group Code of Conduct" to ensure all officers and employees comply with the Code of Ethics as corporate citizens in the execution of their duties.

### Provide High-quality Services

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We will always act from the customer's point of view and strive to provide optimal, high-quality services. We aim to be a corporate group that continuously develops by earning the trust of our business partners, and strive to realize our management philosophy, "Contribute to the maintenance and improvement of human health through supporting research and development for health-related companies".

### Respect for Human Rights and Diversity, and Improvement of Work Environment

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We will always respect fundamental human rights and diversity, and will prevent unfair treatment, discrimination and harassment in the workplace.

In addition, based on our educational policy, "Challenge and Failure", we will create a great workplace where each and every one of the officers and employees can challenge and accumulate success stories by learning from their failure.

### Compliance with Laws and Regulations

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We will comply with applicable laws and regulations and internal rules, and act in accordance with social norms and corporate ethics to fulfill our social responsibilities as a corporate citizen. We will also carry out fair and transparent corporate activities to maintain and improve our corporate culture.

### Fair Corporate Activities

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We will comply with all relevant laws and regulations regarding fair competition and strive to engage in free and fair competition. In addition to complying with the Antimonopoly Act and other laws, we will not engage in unfair trade or unfair competition. We will build equal partnerships with our business partners, maintain and improve mutual understanding and trust, and strive to conduct sincere and fair transactions. When we entertain or give gifts in the course of business, we will do so within the scope of social common sense so as not to violate fair trade and fair competition.

### Elimination of Antisocial Forces

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We have established "Rules for Dealing with Antisocial Forces" to clearly state to all officers and employees that we will not have any relationship with antisocial forces that threaten the order and safety of civil society, and will resolutely eliminate such forces. In the unlikely event that we are confronted with an unreasonable demand or violent act by an antisocial force, we will take resolute action, including contacting the relevant police station and taking legal action.

### **Prevention of Bribery and Other Corrupt Practices**

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We hereby declare that we will never engage in any corrupt practices such as bribery, specifically, of any officers or employees of governments, local governments, and other public organizations, as well as their equivalents, and business partners, both in Japan and overseas, from committing any act of bribery that would fall under the bribery laws of the relevant country, or any act of improperly providing money, services, gifts, entertainment, or other benefits, hereinafter collectively referred to as "bribery and corruption," either directly or indirectly. If an officer or employee of our Group receives a request for bribery and corruption, the officer or employee will reject the request and, if necessary, report the matter to the police or prosecutor's office of the country concerned.

We will not make donations related to political activities to anyone other than political parties or political fund organizations. When providing support related to the activities of political organizations, we will take appropriate action in accordance with the Political Funds Control Law, the Public Offices Election Law, and other related laws and regulations.

### **Thorough Countermeasures against Money Laundering and Terrorists Funding**

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In recent years, the importance of measures to prevent money laundering and terrorist funding has been increasing internationally. We consider it as an important management issue, and if we discover any transactions that may violate these regulations, we will take appropriate action in a timely manner without overlooking them.

### **Protection of Intellectual Property Rights**

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We will appropriately protect the inventions and other results obtained through our corporate activities as intellectual property, and will actively utilize them. We will also respect the intellectual property rights of third parties and promise not to infringe on them.

### **Prevention of Information Leakage**

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Recognizing the importance of the information handled by us, we have established internal regulations to appropriate manage the confidential information of us and our business partners. With regard to personal information and specified personal information, we will comply with Act on the Protection of Personal Information and related notifications, take safety management measures, and handle such information appropriately. In addition, we provide regular training to all officers and employees so that they can recognize the importance of information security, and strive to prevent information leaks.

### **Prohibition of Insider Trading**

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We shall comply with the Financial Instruments and Exchange Law and other relevant laws and regulations, the rules of the financial instruments exchanges, and internal rules in order to appropriately manage undisclosed insider information and prevent insider trading. We will not buy or sell shares or other securities using undisclosed information about our business partners, nor will we provide such information to any third party.

### **Sustainability**

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We will strive to compatibly achieve sustainable society and our sustainable growth through sound corporate activities.

In our corporate activities, we are interested in environmental conservation and are working to reduce waste by conserving resources and energy.

Established January 1<sup>st</sup>, 2022  
SRD Holdings Co., Ltd.  
President & CEO Takaaki Suzuki