

Business Partner Code of Conduct for Sustainable Procurement

Seikagaku Corporation recognizes that collaboration with business partners is essential for remaining a company that engages in sustainable development of the Earth and society and contributes to the health and well-being of people around the world. Accordingly, Seikagaku Corporation has formulated a code of conduct for the purpose of promoting, together with our partners, initiatives aimed at achieving a sustainable society.

This Code of Conduct sets out our initiatives based on Seikagaku Corporation's Basic Sustainability Policy and expresses our expectations for business partners in respect of promoting sustainability initiatives throughout the entire supply chain. We expect our business partners to not only comply with relevant laws and regulations, but also to promote business activities in line with this Code, as set out below.

1. Scope of application

This Code applies to all directors, officers, and employees of Seikagaku Corporation and its subsidiaries. We also expect the business partners of Seikagaku Corporation Group to understand and comply with this Code.

2. Fair trading

- We work to prevent all forms of corruption, such as bribery, extortion, and embezzlement. In business transactions or relations with the government, we do not take part in giving or receiving bribes or illegal solicitation.
- We comply with the competition laws and fair-trading laws and regulations of the countries and regions in which we operate, including the Subcontract Act and Antimonopoly Act of Japan.
- We do not engage in inappropriate payoffs, acts constituting conflicts of interest, abuse of a superior bargaining position, improper representations or advertising of products or services.
- We respect intellectual property rights and do not engage in acts that constitute unauthorized use or infringement of intellectual property.
- We carefully manage personal information and confidential information and work to strengthen information security.

3. Respect for labor and human rights

- We do not participate in forced labor or child labor of any kind.
- We develop structures to prohibit inhumane acts, harassment, and discrimination and work to realize a worker-friendly workplace environment that promotes mental and physical health.
- We respect freedom of association and worker's rights to participate in labor relations or not participate. We will respond in good faith to requests from workers for dialogue.
- We comply with applicable employment, labor and human rights-related laws and regulations of the countries and regions in which we operate, including paying wages that equal or exceed minimum wage.

4. Safety and health

- In accordance with applicable laws, we protect employees from chemical, biological, and physical hazards in workplaces including employee dormitories, and from unsafe work.
- We develop management processes to prevent serious leakage of chemical substances or biological substances.
- We identify potential emergencies at workplaces including employee dormitories in advance, and perform risk assessments to determine hazards. Also, we minimize the impacts of emergencies by preparing emergency plans and response procedures.
- We provide information on toxic substance and hazardous substance safety and offer education and training for employees in compliance with applicable laws.

5. Environment

- We comply with applicable environment-related laws and regulations of the countries and regions in which we operate and engage in environmentally friendly business activities after obtaining necessary permits and licenses.
- We work to decrease greenhouse gas emissions and water use and strive to reduce environmental impacts.

- We develop systems for ensuring waste, exhaust gas, and wastewater safety and carefully manage treatment, transport, storage, disposal, recycling, and reuse.
- We develop systems to prevent leakage or discharge of toxic substances into the environment and mitigate impacts on local communities and biodiversity.
- We increase resource efficiency and promote sustainable resource use and procurement.

6. Management systems

- We develop systems for the implementation of initiatives based on this Code and express our commitment to the items set forth herein.
- We construct appropriate mechanisms to identify and manage the risks set out in this Code. We also manage and maintain documents for complying with this Code.
- We develop appropriate education and training programs for management and workers with respect to this Code.
- We formulate achievement objectives and action plans for promoting the content of this Code and strive for continuous improvement through periodic monitoring.
- We are establishing an internal reporting system that ensures the anonymity of whistleblowers and prohibits retaliation or disadvantageous treatment of whistleblowers.
- We promote fair and honest information disclosure and engage in continuous dialogue with stakeholders.

April 1, 2023

President & CEO

