

Whistleblowing Global Policy

1. Purpose

Based on the Compliance Global Policy, the purpose of this Policy is to establish a Whistleblowing system for ONO Group and to prevent, detect and correct improper conduct at an early stage.

2. Definitions

Definitions of terms used in this policy are as follows.

- (1) "ONO Group" means to Ono Pharmaceutical Co., Ltd. and its consolidated subsidiaries.
- (2) "Staff" means the officers and staff of each company and other persons who are under the control of each company.
- (3) "Outside parties" means retirees of each company of ONO Group companies and external business partners who have business relations with ONO Group companies.
- (4) "Whistleblowing system" means ONO Group's whistleblowing system.
- (5) "Whistleblowing" means reporting or consultation to the Whistleblowing desk as set forth in Article 4 with regard to an act that may fall under any of the following items or any of the following items.
 - ① Violations of the laws and regulations, guidelines, or industry codes to which each ONO Group company is bound.
 - ② Violations of the Articles of Incorporation, Rules of employment, ONO Group Code of Conduct and other company policies.
- (6) "Misconduct" means the act set forth in Article 2(5) ①②.
- (7) "Whistleblower" means the person who has made Whistleblowing (directly or indirectly) in accordance with this Policy.
- (8) "Investigation Collaborators " means a person who cooperates in interviews and inquiries conducted by the ONO Group's Whistleblowing response personnel for the purpose of investigation.
- (9) "Whistleblowing response personnel" means a person who are involved in the Whistleblowing desk and internal Whistleblowing response operations.

3. Scope of Application

This policy applies to ONO Group Staff.

4. Whistleblowing process

ONO Group companies shall establish a Whistleblowing process for Staff based on the laws and industry regulations of each country and make it known to Staff and operate an internal Whistleblowing process responsibly.

In addition, based on the laws and industry regulations of each country, each ONO Group Company, may consider the establishment of a Whistleblowing process for Outside parties as necessary.

5. Prohibition of Reporting for Unauthorized Purposes

The Whistleblower shall not report or consult for the purpose of personal gain or for any false or slander or other improper purpose.

6. Obligation of Cooperation

Staff of ONO Group shall cooperate in the investigation of Whistleblowing when requested. In addition, in the event that the provision of documents, data, etc. related to the investigation is requested, they shall be cooperated to the extent permitted under the applicable laws and regulations of each country. ONO Group companies shall impose penalties, including disciplinary actions, on anyone who violates this Article.

7. Corrective Measures and Preventive Measures

To the extent determined to be necessary or appropriate, ONO Group companies shall promptly take corrective measures and preventive measures if the existence of Misconduct becomes evident as a result of the investigation.

8. Disposition against Misconduct

- (1) In the event that an investigation reveals Misconduct, ONO Group Companies shall impose necessary penalties, including disciplinary actions on anyone who has been involved in the such Misconduct.

- (2) In cases where Staff of ONO Group make Whistleblowing about their own Misconduct or cooperate in investigating the relevant Misconduct, ONO Group companies may consider reducing the content of the disposition taking into account the laws and regulations of each country.

9. Protection of Whistleblowers

- (1) ONO Group companies shall not dismiss, refuse to renew a labor contract, demote, reduce salary, or otherwise treat Whistleblowers and Investigation Collaborators (who act in good faith) disadvantageously on the grounds that Whistleblowers have given Whistleblowers or Investigation Collaborators have cooperated in the investigation.
- (2) ONO Group companies must take appropriate measures to avoid a deterioration in the working conditions of Whistleblowers or Investigation Collaborators (who act in good faith) because Whistleblowers have reported whistleblowers or Investigation Collaborators have cooperated with the investigation. In addition, appropriate remedies and recovery measures shall be taken against Whistleblowers or Investigation Collaborators who have received disadvantageous treatment in violation of the preceding paragraph.
- (3) ONO Group companies shall impose penalties, including disciplinary actions, against anyone who has disadvantageously treated Whistleblowers or Investigation Collaborators (who act in good faith).

10. Confidentiality

Staff of the ONO Group must not make unauthorized disclosure the contents of Whistleblowing and information obtained through investigations to third parties, unless there is a legitimate reason. ONO Group companies shall impose penalties, including disciplinary actions, on anyone who violates this Article.

11. Prohibition of Exploration

Staff of the ONO Group must not attempt to identify who is a Whistleblower or who is an Investigation Collaborators in connection with Whistleblowing. ONO Group companies shall impose penalties, including disciplinary actions, on anyone who violates this Article.

12. Responsibilities of Staff

Staff of the ONO Group shall endeavor to rectify any improper conduct, etc. they are aware of, and shall actively utilize the Whistleblowing system of each company as needed.

13. Education and Dissemination

ONO Group companies shall educate and inform Staff about the Whistleblowing system and respond to inquiries and inquiries about the mechanism of the Whistleblowing system and its adverse handling received from Staff

14. Reporting to OPJP Risk & Compliance Management Department

ONO Group companies shall report to OPJP Risk & Compliance Management Department to the extent permissible under applicable laws and regulations in each country in the event that the occurrence of the matters subject to reporting as stipulated in Article 9 of the Compliance Global Policy is confirmed by the Whistleblowing system.