

List of Our Policies

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CORE VALUES

<Motto>

**Creativity, Fairness,
Dreams and Passion**

<Creed>

We create safe and useful products for human well-being with basic research based on glycoscience.

<Guidelines for Our Activities>

- We create a corporate environment of mutual trust and communication using individual abilities.
- We create innovative and useful products through in-depth cooperation between industrial and academic circles.
- We assure the highest quality and safety of our products.
- We enhance interaction with society by establishing genuine trust.

Through these efforts, Seikagaku will strive to become a sound and socially responsible company that protects the natural environment and improves quality of life.

Our Motto

◆Creativity

Individual and corporate creativity are important for scientific advancement aimed at pursuit of truth. We can produce novel new products, new technologies, and new use of products by developing and applying unique and creative approaches, thus we can expect to achieve sound and stable corporate growth as a result of these efforts.

◆Fairness

We will adhere to principles of fairness that are recognized worldwide, and through self-disciplines, will ensure we remain a company that is respected by society at large. Our "creativity" and our "dreams and passion" must be built on a foundation of fairness.

◆Dreams and Passion

We have high ambitions, and strive to achieve our dreams by working toward our ideals. This is the ultimate source of growth for our employees and our company.

Basic Sustainability Policy

Seikagaku Corporation Group, guided by the core values expressed in the motto “Creativity, Fairness, Dreams and Passion”, has developed this Sustainability Policy to support the company’s commitment to sustainability for society and the planet as reflected in the following management creed: “We create safe and useful products for human well-being with basic research based on glycoscience.”

In undertaking this, we will meet the expectations of our diverse stakeholders and undertake best practices aimed at creating fair and honest relationships on the basis of high corporate ethical standards that reflect a profound awareness of our social mission and responsibilities as a life sciences company.

On the basis of these ideals, Seikagaku Corporation Group seeks to grow as a corporate group that is valued by the world for providing a stable supply of vital, high-quality products created from innovative R&D activities and contributes to the health and well-being of people around the world, improving society.

Six Initiatives for Sustainable Development of Society and Enhancement of Corporate Value

1. Creation of truly useful pharmaceuticals and medical devices;
2. Provision of a stable supply of high quality pharmaceuticals and medical devices;
3. Expansion of healthcare access and appropriate provision of high-quality medical information;
4. Fair and ethical business activities and corporate governance;
5. Promotion of diversity and human resource development; and
6. Engagement in environmentally friendly corporate activities.

April 1, 2023
President & CEO



Corruption and Bribery Prevention Policy

Seikagaku Corporation recognizes that high ethical standards are required of a pharmaceutical company that supplies the world with safe and useful pharmaceuticals and other products. In accordance with this Corruption and Bribery Prevention Policy, we will engage in appropriate business operations by building and maintaining fair, highly transparent, and sound relationships with our stakeholders.

1. Scope of application

This Policy applies to all directors, officers, and employees of Seikagaku Corporation and its subsidiaries.

2. Legal compliance

We comply with anti-bribery laws, regulations, and industry standards applicable in all countries and regions where Seikagaku Corporation engages in business activities.

3. Prohibition of corruption

We do not engage in corruption. Our personnel are expected to avoid any conflicts of interest, illegal actions, whether for individual or organizational gain, including fraud, money laundering, or insider trading.

4. Prohibition of bribery

We do not offer bribes to, or demand or accept bribes from, other individuals including, government officials, public servants, medical practitioners, and company representatives, either directly or indirectly, for the purpose of securing or maintaining a business benefit.

5. System for the prevention of corruption and bribery

To prevent corruption and bribery, we provide education and training to directors, officers, and employees of Seikagaku Corporation in accordance with this Policy and, through our internal reporting system, appropriately deal with questions or allegations of corruption or bribery.

6. Violations

If any violation of this Policy occurs, the company may impose discipline on the directors, officers, or employees in accordance with the rules of employment. We will also strive to prevent any reoccurrence.

April 1, 2023

President & CEO



Privacy Policy

Seikagaku Corporation ("Seikagaku") views the protection of personal information as an important social responsibility, and strives to manage personal information as described below.

In accordance with relevant laws, regulations and our own internal corporate policies, Seikagaku shall strive to notify all Seikagaku employees of our privacy policy, and shall handle personal information lawfully and appropriately.

1. Collection of Personal Information

Seikagaku shall only collect personal information through lawful and appropriate means, and with a legitimate business purpose, identifying clearly the purposes and methods of use of the personal information.

2. Use of Personal Information

Seikagaku shall not use the personal information it collects for any purpose other than the purpose(s) indicated to the individual when it was collected without first obtaining such individual's consent.

3. Provision of Personal Information

Personal information shall not be provided or disclosed to any third party except under the following circumstances:

- (1) With the prior written consent of the individual;
- (2) Where the provision of the information to a third party is permitted under the Act on the Protection of Personal Information or other relevant law; or
- (3) Where the provision or disclosure of the information is required by law.

4. Personal Information Security Measures

Seikagaku shall strive to develop internal corporate regulations and enact safety measures to prevent and correct unauthorized access to personal information, and the inadvertent disclosure, loss, or falsification of personal information. When personal information is entrusted to a contracted service provider, Seikagaku shall supervise that service provider to ensure that personal information is being handled properly.

5. Policy Revisions

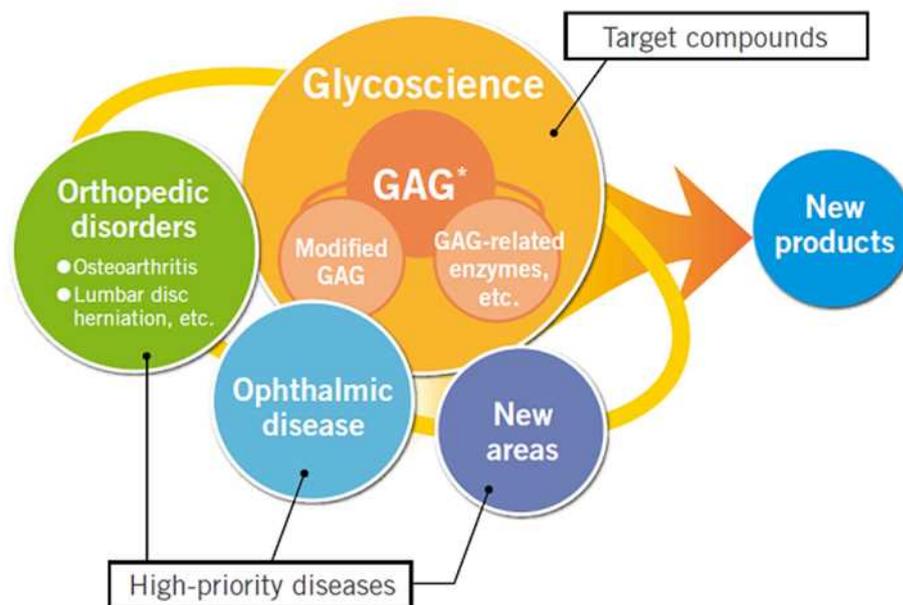
Seikagaku shall strive to adequately respond to changes in the social environment with regard to the handling of personal information.

Seikagaku shall strive to maintain and raise the current level of privacy protection offered, by revising this policy or any related internal regulations, if Seikagaku determines it to be necessary. Any revisions made to this policy shall be posted on our web site.

R&D Basic Policy

In order to rapidly and continuously create new products, Seikagaku engages in efficient R&D activities by focusing on target compounds and prioritizing target diseases. The focus of our drug discovery is glycosaminoglycans (GAG), which are the structural components known as glycoconjugates.

In research spanning nearly 70 years, we have accumulated a wealth of experience and expertise related to GAG drug discovery research and GAG production and formulation technologies. Today, we apply hyaluronic acid or unmodified GAG in pharmaceuticals and also engage in research and development of modified GAG produced using a cross-linking technology as well as enzymes and other substances that act on GAG. Given the properties of GAG, we focus mainly on orthopedic disorders and ophthalmic diseases as high-priority areas for now, where we have expertise through the development of such products as ARTZ Dispo joint function improving agent and OPEGAN ophthalmic viscoelastic device.



*GAG: Glycosaminoglycans
(One of the constituents of complex carbohydrates)

Disclosure Policy

1. Basic policy and guidelines for information disclosure

The basic policy for information disclosure of Seikagaku Corporation (“Seikagaku”) is to provide consistent and reliable company information to capital market participants such as shareholders, investors and securities analysts, as well as to other stakeholders including customers and business partners, in a fair and timely manner.

Seikagaku discloses information in accordance with the Companies Act, the Financial Instruments and Exchange Act and other laws and regulations and provisions on the timely disclosure of company information provided for in the Securities Listing Regulations of the listed exchange (“Timely Disclosure Rules, Etc.”). Even if the Timely Disclosure Rules, Etc. do not apply, Seikagaku discloses information that it believes will have a significant impact on investment decisions. However, Seikagaku does not disclose personal information, customer information and information that could be detrimental to the rights of the parties concerned.

Information on pharmaceutical products, etc. (including those under development) included in disclosed information is not intended to constitute a promotional advertisement or give medical advice.

2. Method of information disclosure

Seikagaku discloses information applicable to the Timely Disclosure Rules, Etc. on the timely disclosure network (“TDnet”) of the Tokyo Stock Exchange. Information published on TDnet is immediately posted on the website of Seikagaku. Seikagaku also discloses information not applicable to the Timely Disclosure Rules in a fair and timely manner using an appropriate method as needed.

3. Handling of performance forecasts and future information

Information about the forward-looking statements regarding performance forecasts, management strategies, information on plans and research and development disclosed by Seikagaku is based on judgments made from information available to Seikagaku at that time. and include risks and uncertainties. Actual results, etc. may differ significantly from these kinds of future information due to various factors.

4. Quiet period

Seikagaku sets the period from the day following the closing date of quarterly results to the date of results announcement as a quiet period to prevent the leakage of financial information and ensure the fairness of information disclosure. During the quiet period, Seikagaku shall refrain from answering questions about financial results or making comments. However, Seikagaku shall respond to inquiries about information that has already been published. Even during the quiet period, if it has become likely that financial results forecasts will be significantly differed, Seikagaku shall disclose information in accordance with the Timely Disclosure Rules as necessary.

5. Internal structure concerning information disclosure

Seikagaku shall operate the Disclosure Policy appropriately and build and maintain a system to implement appropriate information disclosure. At Seikagaku, the officer in charge of the Corporate Strategy, HR, F&A and Corporate Staff, who is the chief information manager, engages in the internal management and disclosure of important company information and shall consolidate information and make appropriate and prompt disclosure in accordance with the information disclosure regulations.

Human Rights Policy

Seikagaku Corporation recognizes that our corporate responsibility includes respecting the human rights of people around the world. Through this foundational value, we aim to contribute to society. In accordance with the UN Guiding Principles on Business and Human Rights, Seikagaku Corporation will manage and operate its business in a manner that respects human rights.

1. Positioning of the Policy

This Policy is a high-level policy governing all regulations and norms relating to Seikagaku Corporation's human rights initiatives.

2. Scope of application

This Policy 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 Policy.

3. Respect for internationally recognized human rights

We engage in initiatives based on the UN Guiding Principles on Business and Human Rights and respect the human rights policies set out in the ILO Declaration on Fundamental Principles and Rights at Work, adopted by the International Labor Organization.

We will take appropriate corrective actions to any human rights violations we may cause or contribute to in our business activities. Also, we will follow appropriate procedures for any inadvertent involvement in human rights violations through business relationships that have been identified.

We comply with the human rights laws and regulations of the countries and regions where we engage in business activities. We will pursue a means of respecting internationally recognized human rights if any discrepancy occurs between internationally recognized human rights standards and Japanese laws and regulations.

4. Human rights due diligence

With the aim of appropriately addressing any adverse human rights impacts (including potential impacts) in our business activities, we will pursue continuous improvement, such as identifying adverse actions and taking appropriate corrective and preventive measures.

Examples of Human Rights Issues in Business Activities

Forced labor

We do not tolerate forced labor of any kind. The term “forced labor” refers to any work or service, such as human trafficking and bonded labor, that people are compelled to perform against their will under threat of punishment.

Child labor

We do not tolerate child labor or exploitation of children. The term “child” refers to persons who have not reached the greater of: the age of 15 years, the age of completion of compulsory schooling, or a country’s minimum age for admission to employment. Also, workers under the age of 18 years are prohibited from undertaking hazardous work.

Respect for freedom of association

In compliance with local laws and regulations, we respect the right of individuals to form and join trade unions and also respect the right to refrain from such activity. We create an environment in which workers can express their opinions without fear of discrimination or retaliation.

Discrimination and harassment

We aim to create workplaces that are free of harassment and discrimination and, to promote a diverse workplace where individuals are free to fully demonstrate their capabilities. We do not tolerate discrimination of any kind, including discrimination on the basis of race, color, age, gender, sexual orientation, gender identity or gender expression, ethnicity or nationality, disability, pregnancy, religion, or other attributes. Also, we respect the religious customs of workers and strive to accommodate them in accordance with applicable laws.

Working hours

We comply with all applicable employment standards laws and regulations in the countries and regions in which we operate, including related to working hours, breaks, overtime, vacation, and public holidays.

Wages

We comply with local laws and regulations related to wages, including paying no less than minimum wage and having regular payroll dates.

Occupational safety and health

In compliance with local laws and regulations, we take all reasonable steps to ensure a safe and healthy workplace.

5. Education and training

To engage in initiatives based on this Policy, we will provide human rights related education and training for all directors, officers, and employees as required under applicable law.

6. Dialogue with stakeholders

We will actively pursue dialogue with stakeholders whose human rights could be adversely affected.

April 1, 2023

President & CEO



Procurement Policy

Seikagaku Corporation has made “Creativity, Fairness, Dreams and Passion” its motto. The purpose is to live up to the following management creed: “We create safe and useful products for human well-being with basic research based on glycoscience”. The company’s efforts, along with collaboration with business partners, are essential for creating a stable supply of safe, useful, and high quality pharmaceuticals and products.

Accordingly, Seikagaku Corporation has formulated the Procurement Policy which sets out the company’s sustainability approach in procurement activities and reflects the company’s practice of responsible procurement. Procurement for the purposes of this Policy includes raw and other materials, supplies, and all resources necessary for the business. Seikagaku Corporation will abide by the content of this Policy and, together with our business partners, contribute to the sustainability of Earth and society.

1. Scope of application

This Policy 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 Policy.

2. Legal compliance and fair procurement activities

We will comply with the applicable procurement laws and regulations of the countries and regions where Seikagaku Corporation engages in business activities.

3. Respect for human rights

We fulfill our corporate social responsibility by respecting the human rights of involved stakeholders and undertake to develop in collaboration with our business partners a safe working environment.

4. Environmental protection

We will engage in procurement activities that align with the Environmental Policy and strive to reduce environmental impacts throughout the entire supply chain in collaboration with our business partners.

5. Quality and safety assurance and fair selection of business partners

We engage in procurement activities with the highest priority on quality and safety assurance, including business partner selection. We will build a fair and transparent procurement process that also gives consideration to impacts on society and the environment.

6. Information management

We will develop a system for appropriately managing information obtained from our business partners in procurement activities and work to build relationships of trust.

7. Promotion of responsible procurement

We will promote responsible procurement activities by engaging in initiatives in line with this Policy and work toward a more sustainable society.

April 1, 2023

President & CEO



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



Occupational Safety and Health Policy

Seikagaku Corporation recognizes that ensuring the safety and health of all employees is a matter of the utmost importance in corporate management. Under this Occupational Safety and Health Policy, we strive to create a safe and healthy workplace environment in accordance with applicable laws.

1. Scope of application

This Policy applies to all directors, officers, and employees of Seikagaku Corporation and its subsidiaries.

2. Continuous maintenance and improvement

We undertake to continuously maintain and improve our safety and health management system.

3. Legal compliance

We comply with all applicable occupational safety and health related laws and regulations in the countries and regions in which the company operates, and strive to improve the level of safety and health within our company.

4. Risk reduction and realization of a comfortable workplace environment

We endeavor to identify all work-related hazards and to undertake all reasonable steps to ensure a safe and comfortable workplace. Also, we encourage our workers and management to work in unison to maintain and improve the workplace environment through communication within the organization.

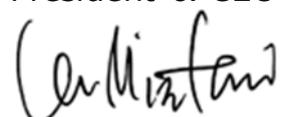
5. Education and training

We provide applicable occupational safety and health related education and training for all employees and endeavor to raise safety awareness.

6. Information disclosure

We disclose accurate and highly transparent information about this Policy, initiatives, and other matters and strive for continuous communication with stakeholders through a website and other means.

April 1, 2023
President & CEO



Environmental Policy

Seikagaku Corporation recognizes that global warming is a critical challenge facing the world and sees the contribution to a sustainable society an important mission for the company.

As a pharmaceutical company and as a member of society, Seikagaku Corporation aims to achieve balance between environmental measures and the company's growth and will implement initiatives to promote business activities with a low adverse impact on the environment.

1. Scope of application

This Policy applies to all directors, officers, and employees of Seikagaku Corporation and its subsidiaries.

2. Environment-friendly business activities

We pursue environmental impact reduction in all aspects of our business activities and strive to continuously maintain and improve our environmental performance.

3. Environmental impact reduction, biodiversity preservation

We work to mitigate climate change and adapt to its impacts and to prevent pollution, recycle resources, effectively use energy and water resources, and preserve biodiversity.

4. Legal compliance

We engage in environmental protection activities in compliance with the applicable environment protection related laws, regulations, and voluntary control standards of the countries and regions in which we operate.

5. Partnership with society

We strive for environmental protection in partnership with all of our stakeholders, including our business partners.

6. Education and awareness activities

We work to increase the environmental consciousness of each individual employee through environment-related education and awareness activities.

7. Information disclosure and communication

We strive to earn the trust of society through disclosure of environment related information and communication with local communities.

April 1, 2023

President & CEO

A handwritten signature in black ink, appearing to read "C. Mizuno", is positioned below the printed name of the President & CEO.

Biodiversity Policy

Recognizing the importance of biodiversity in business as a life sciences company, Seikagaku Corporation strives for biodiversity preservation and the sustainable use of biological resources.

1. Scope of application

This Policy applies to all directors, officers, and employees of Seikagaku Corporation and its subsidiaries.

2. Corporate management that gives consideration to biodiversity

We practice corporate management that gives consideration to biodiversity by identifying impacts that business activities have on biodiversity throughout the supply chain and striving to minimize impacts.

3. Biodiversity preservation through environmental impact reduction

We strive to reduce environmental impacts that have a negative effect on biodiversity by engaging in climate change alleviation, pollution prevention, resource recycling, and effective use of energy and water.

4. Raising awareness of biodiversity preservation

We strive to raise awareness of biodiversity preservation and contribute to creating a society that fosters biodiversity through communication with stakeholders.

5. Legal compliance

We comply with the laws, regulations, and agreements of the countries and regions in which we operate and strive for the fair use of biological resources, including genetic resources.

6. Information sharing

We proactively disclose our own activities related to biodiversity preservation.

April 1, 2023
President & CEO



SKK Group Compliance Code of Conduct (Summary)

Notes:

- 1) Please interpret the term “company” to mean the company within SKK Group for which you work.

We (the Directors, Corporate Auditors, Executive Officers and Employees of Seikagaku Corporation (“SKK”) and its subsidiaries/group companies) shall conduct our respective corporate activities in compliance with this SKK Group Compliance Code of Conduct. “Employees” as used herein shall mean all employees, including full-time part-time, and temporary staff.

1. Basic Policy

As a life-sciences company, we will always maintain the highest respect for the health and safety of our customers worldwide and display high corporate ethics that will earn the trust of our global customers, commercial partners and investors.

2. Business Activities

We will research, develop, manufacture, and market pharmaceuticals, clinical diagnostic and laboratory reagents and other products that are safe, effective and useful for their intended purpose and of high quality (hereinafter referred to as "Pharmaceutical and Other Products"), and provide them in a professional manner with complete and accurate product information, all under the control of an appropriate Quality Management System. We shall also promote their proper use of our Pharmaceutical and Other Products.

3. Relationship with Patients, Consumers, Medical Professionals, Business Partners, etc.

We will strive to improve mutual understanding and trust among patients, consumers, medical professionals, business partners, etc., and will maintain fair and balanced relationships.

4. Relationship with Shareholders and Investors

We will strive to build honest and transparent relationships with our shareholders and investors through timely and complete communication and constructive dialogue.

5. Relationship with Employees, etc.

We will respect the human rights and individuality of each Employee and will strive to maintain a safe and respectful work environment.

6. Relationship with Regulators and Government Entities

We will appreciate the mission and responsibility of regulators and government entities, and maintain fair, transparent and healthy relationships with them.

7. Relationship with Global Environment and Civil Society

We will value coexistence with society, engage voluntarily and actively in social contribution and global environmental conservation, contribute to the realization of a sustainable society, and act as a good corporate citizen.

8. Relationship with Company's Property and Information

We will use the company's property and information properly and manage personal and confidential information in an appropriate manner.