

sawai Group Information Security Policy

Sawai Group, aiming to achieve the group's corporate philosophy and code of conduct, hereby establish this Information Security Policy in order to ensure the appropriate handling of its information assets.

1. Information Security System

Sawai Group establishes the system to protect its information assets by ensuring its compliance with laws and other rules related to information security, appointing responsible personnel for information security, and assigning such personnel the responsibility and authority relevant to information security.

2. Information Security Measures

Sawai Group ensures human element information security by developing standards, detailed rules and SOPs based on this Information Security Policy, having all personnel in the Group comply with these standards, and implementing logical/physical information security measures to mitigate unauthorized or unnecessary access to, leakage, falsification, loss or destruction of its information assets.

3. Information Security Audit and Training

Sawai Group ensures that the information security level be maintained in the Group by implementing periodic inspections and audits of its information security situation and enhancing the awareness of information security within the Group by conducting periodic training activities and exercises focused on information security.

4. Incident Prevention and Measures

Sawai Group takes all reasonable measures to prevent information security incidents. In the event of an information security incident, Sawai Group immediately responds to such an incident aiming to minimize any damage therefrom, and takes any legal action, measures for reoccurrence prevention, and/or other necessary actions.

Supplementary Provisions

This Policy shall be under the jurisdiction of the Group Chief Administrative Officer of Sawai Group Holdings.

The amendment and repeal of this Policy shall require the resolution of the Sawai Group Holdings Board of Directors.

Enacted and enforced on September 26, 2017

Revised and enforced on April 1, 2021

※Due to the transformation of Sawai Pharmaceutical into a holding company, the former Group policies of Sawai have been partially replaced and applied.