

Global Compliance Code

1. My Expectations to All Sysmex Group Associates

Dear Colleagues,

We continue to grow as a leading healthcare company, with the aim of contributing to solving global medical issues and realizing a sustainable society. Every day, we take on the challenge of creating high-value testing and diagnostic technologies and are evolving in many ways; however, our stance toward compliance remains unchanged. Based on the Sysmex Way and Shared Values, our Group's corporate philosophy, we define compliance as "conducting business activities not only in compliance with applicable laws and regulations, but also based on fairness and high ethical standards", in order to ensure that Sysmex continues to be a company of integrity. This "Global Compliance Code" contains particularly important ideas, rules, and behavioral guidelines that all Group officers and employees should comply with.

We need to grasp the changes in the world and constantly think about what we should be doing now. When making judgements, please remember to refer back to the "Global Compliance Code" and prioritize compliance. I expect each and every one of you to act appropriately as a member of the Sysmex Group with high integrity.

A handwritten signature in black ink, which appears to read "Hisashi Ietsugu". The signature is fluid and cursive.

Hisashi Ietsugu
Chairperson and Group CEO



2. Scope of Application

The Global Compliance Code applies to all officers and employees of the Sysmex Group.

Each and every officer and employee is expected to understand this Global Compliance Code and the Company's policies and rules and to act accordingly and appropriately.

3. Making Judgements

The Global Compliance Code does not cover all situations. If you are not sure whether you are making the right judgement, consider it from the following perspectives.

- ✓ Whether the judgement, action, or result leaves you in any doubt.
- ✓ Whether the judgment, action, or result would be in accordance with laws, regulations, and Sysmex rules.
- ✓ How the judgement, action or result would be reported in newspapers or news coverage.
- ✓ Whether the judgment, action, or result may have negative impact on the Sysmex Group or yourself.

4. Our Promises

Human Rights/Discrimination

Sysmex will endeavor to create a workplace where everyone can communicate openly with each other to ensure that everyone can exercise their abilities with peace of mind. Sysmex will not tolerate unfair labor practices against the will of employees. We will respect diverse ways of thinking and treat everyone with respect. We will respect each other's dignity, privacy and rights. We will not engage in discrimination, acts that may lead to discrimination, harassment of any kind, or any other behavior that disrespects individuality, and will endeavor to create a fair workplace.

Occupational Safety

Sysmex considers the organizational strengths and individual expertise of its officers and employees as Sysmex's most valuable assets. Sysmex will comply with the applicable laws and regulations of each country and region, and will endeavor to maintain and enhance the mental and physical health of its officers and employees, and to create a safe and comfortable workplace.

We will proceed with our operations in a safe way in accordance with laws, regulations, and internal rules.

Labor Standards

Sysmex will pay fair wages for labor. Sysmex will observe the principle of equal pay for equal work and will provide equal opportunities regardless of gender or other factors.



Company's Assets

We will appropriately manage and efficiently utilize the Company's assets. We will use the Company's assets only for its business activities and will not use them for personal or third-party benefit, such as obtaining money, goods, services or other benefits, by making use of the reputation or fame of the Group or the Company, or by using their job-related authority or position.

Confidentiality of Information

Information is an important asset for us to continue our business activities. We will handle information in a lawful and appropriate manner. We will use information only for designated business purposes. We will comply with the applicable laws and regulations of each country and region and internal rules, and will endeavor to prevent information leakages and protect the rights of third parties.

Personal Information

We will handle personal information in a lawful, fair, and transparent manner, including the collection, storage, sharing, and deletion of personal information. We will use personal information only to the extent necessary for the purposes for which it is handled. We will comply with the applicable laws and regulations of each country and region and internal rules.

Intellectual Property Rights

Intellectual property rights are important assets for Sysmex Group to secure our business advantage. We will respect Sysmex Group's intellectual property rights, and will endeavor to maintain and preserve them.

Just as we respect Sysmex Group's intellectual property rights, we also respect and appropriately handle intellectual property rights of third parties.

Proper Accounting Procedures/

Timely Disclosure of Financial Statements and Material Information

We will comply with the applicable laws and regulations of each country and region and internal rules, and will properly perform accounting procedures. We will maintain accurate and complete records of vouchers, ledgers, and other accounting records, and will not engage in any fraudulent accounting procedures such as falsehoods or forgeries.

We will prepare financial statements that accurately reflect our business and financial conditions, in a fair and transparent manner.

We will appropriately communicate corporate information, such as the Group's business conditions and business activities, to our stakeholders, in accordance with the applicable laws and regulations of each country and region, and internal rules. We will disclose information related to our business, operations or financial performance that may have a significant impact on investment decisions to our stakeholders in a timely and appropriate manner.



Tax Policy

We will carry out the appropriate payment of taxes in accordance with the spirit of the law in all countries and regions in which we conduct our business, thereby contributing to economic development.

For transactions with foreign affiliated corporations, we will comply with the OECD guidelines and transfer pricing taxation systems, etc. of each country and region, undertake proper transfer pricing, and appropriately pay taxes in each country.

We will not transfer value created to countries or regions with low tax rates, including tax havens, for the sole purpose of obtaining tax benefits. Furthermore, we will not conduct any aggressive tax planning that uses tax structures without substance that is aligned with our business objectives.

Safety of Products and Services

We will place a priority on providing safety and security to our customers, healthcare professionals and patients. We will ensure thorough quality control in compliance with all applicable safety-related laws and regulations of each country and region, as well as internal rules.

In the event that the safety of our products or services may be affected, we will act while giving the highest priority to our customers, healthcare professionals and patients safety. We will investigate the facts in a prompt and accurate manner, appropriately disclose information both internally and externally, identify the causes, and take measures to prevent recurrence.

Proper Research and Development Activities

In our research and development, we will comply with the applicable laws and regulations of each country and region, and will prepare accurate data that enable us to judge the efficacy and safety of our products. We will protect the dignity and human rights of subjects and will comply with relevant ethical and other guidelines. When conducting animal experiments, we will comply with the applicable laws and regulations of each country and region related to animal protection, and will limit such experiments using animals to a minimum. When using genetically modified organisms, we will comply with the applicable laws and regulations of each country and region, and will thoroughly ensure the management of safety to ensure that living modified organisms do not affect wildlife and the natural environment. When using regulated substances, we will comply with the applicable laws and regulations of each country and region, and will thoroughly ensure the management of safety.

Transparency of Relationships with Healthcare Professionals and Healthcare Organizations

As a member of the healthcare industry, we will give the highest priority to contributing to the health and welfare of patients, and will comply with the applicable laws and regulations of each country and region and the rules of the healthcare industry, and will endeavor to establish and maintain appropriate relationships with healthcare professionals and healthcare organizations and to ensure transparency in such relationships.



Antitrust/Anti-Competitive Behavior

We will not agree or engage in concerted practice with competitors with the intent of or that has the effect of reducing competition. We will not exchange with competitors competitively sensitive information unless such exchange is necessary for a legitimate transaction and in such case only to the extent necessary for the transaction. We will treat our business partners and suppliers in a fair manner and will not abuse our position in the market or bargaining power such as imposing unreasonable terms against our business partners and suppliers. We will provide our customers with accurate information regarding our products and services. We will comply with the applicable competition laws of each country and region and internal rules.

Corruption and Bribery

We will not engage in any corrupt practices, such as giving or offering bribes or providing inappropriate entertainment or gifts to public officials, customers, or business partners, or any other practices that may appear to be such corrupt practices. We will refuse to accept entertainment, gifts or other things from business partners that go beyond moderation. We will comply with the applicable laws and regulations in each country and region and internal rules, related to anti-bribery.

Conflicts of Interest

We will distinguish between our position at Sysmex and our position as individuals. When making business decisions, we will do so based on Sysmex's interests, rather than our personal interests. We will endeavor to ensure that the expression of our opinions and our actions as individuals in any medium, including orally and on social media, are not perceived as those of Sysmex.

We will discipline ourselves to ensure that our words and actions do not cause disadvantage to Sysmex's business activities.

Insider Transactions

We will strictly manage undisclosed material information of the Group and its business partners obtained in the course of our business. We will not disclose or divulge any undisclosed material information to third parties, including orally and on social media, in any manner or through any medium without permission. We will not conduct transactions such as selling or buying shares of the Group and its business partners and other transactions by making use of undisclosed material information.

Human Rights Due Diligence (Human Rights DD)

Sysmex will support and respect international norms on human rights. Sysmex will respect human rights not only of its officers and employees, but also of everyone involved in its business activities throughout the supply chain. Sysmex will conduct human rights due diligence to address the adverse human rights impacts of Sysmex's business activities and transactions with its business partners. If Sysmex becomes aware of any negative impact on human rights, it will implement remedies.



Security Trade

We will comply with the applicable regulations and internal rules regarding export control in each country and region for the maintenance of international peace and safety. We will strictly control regulated commodities and technology and purpose of transactions. We will not conduct business without permission with embargoed countries or sanctioned parties.

Antisocial Forces

We will not have any relationship with antisocial forces or groups that threaten social order and safety. We will reject any transactions with antisocial forces or groups, provision of funds to them, or any other unreasonable demands from them.

Environment

We will give consideration to environmental conservation in all of our business activities in order to contribute to a sustainable society. We will endeavor to minimize the impact on the environment by addressing resource recycling in all value chains: research and development, procurement, manufacturing, logistics, sales, service and support. We will comply with environment-related laws, regulations, and internal rules.

5. Speak Up

If you have any questions about compliance or notice a violation or potential violation, please speak up.

At Sysmex Group, you can report to or consult with your superiors, the relevant departments, or the whistleblowing system which is introduced within Sysmex Group globally.

6. Our Response to Violations

If any violation of applicable laws, regulations, guidelines in any country and region or the Global Compliance Code occurs, Sysmex will take appropriate actions, such as corrective measures, recurrence prevention measures and disciplinary actions.

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