

## **PaMeLa Inc. Basic Information on Business Transaction with us**

May 20, 2017

Amended on July 30, 2018

As for our business partners, we expect them to comply with the following.

If the following are not adhered to, or if any other unauthorized transactions are discovered, we may take action, including suspension of transactions, as determined by the Compliance Committee.

1. Not to engage in any unauthorized transactions with us that fall under any of the following.
  - 1 ) Bribery and/or collusion with our researchers in business dealings
  - 2) Preparing and submitting documents that differ from the facts of the transaction
  - 3 ) Fictitious billing and other fraudulent matters
2. If you are consulted by one of our researchers about an illegal transaction or request, you must immediately decline the request and contact the company's report desk.
3. The delivery of goods must be accompanied by a delivery note showing the date of delivery. This does not apply to electronic deliveries such as e-tickets.
4. Please understand that researcher does not have the authority to place orders directly, and must reject any orders placed by the researcher. However, this does not apply to over-the-counter or online orders with the permission of the Administration or the Director.
5. In principle, orders should be received by email. Please make sure that the email address of the PaMeLa administrative department (pamela\_affairs@pain-ml.com) is CC'd and approved by the Administration.