



## **Astellas Pharma Australia Pty Ltd Modern Slavery Statement for the Year Ended 31 March 2020**

### **Introduction / Background**

#### ***Who is covered by this Modern Slavery statement?***

This Modern Slavery statement (**statement**) is made by Astellas Pharma Australia Pty Ltd (ABN 81 147 915 482) with registered office at Level 3, 6 Eden Park Drive, Macquarie Park NSW 2113 Australia (referred to as **Astellas Australia**) in accordance with the Australian *Modern Slavery Act 2018* (Cth) (the **Act**) and covers the financial year from 1 April 2019 to 31 March 2020. No other entities are covered by this statement.

Astellas Australia together with other Astellas group companies (**Astellas** in this statement) is dedicated to improving the health of people around the world through the provision of innovative and reliable pharmaceutical products. To find out more about what we do and our values, please go to: <https://www.astellas.com/en>

Astellas Pharma Inc (Astellas Australia's parent company) is a signatory to the United Nations Global Compact which demonstrates our existing voluntary support for achieving sustainable growth, including our respect for internationally proclaimed human rights and our desire to ensure that we are not complicit in human rights abuses. In June 2020, Astellas Pharma Inc. was included in the FTSE4 Good Sustainability Index for the ninth consecutive year (with the period evaluated being the financial year ended 31 March 2020) which includes human rights and labour standards as part of its selection criteria.

We know that slavery, servitude, forced or compulsory labour and human trafficking (collectively referred to as "**Modern Slavery**" in this statement) is a global, complex and increasing challenge for governments and business. Astellas is committed to doing its part to monitor and remediate any such issues it identifies in its operations and supply chains.

As a business Astellas recognises our responsibility to respect human rights and manage the risk of Modern Slavery within our own organisation and supply chain.

### **Our Structure, Operations and Supply Chain**

#### ***Our Structure***

Astellas Australia is a company limited by shares and incorporated in New South Wales. Astellas Australia employs approximately 70 people. Astellas Australia does not own or control any other entities.

Astellas Pharma Inc. is the ultimate holding company of the Astellas group including Astellas Australia. Astellas Pharma Inc. is incorporated in Japan and listed on the Tokyo Stock Exchange.

#### ***Our Operations***

Astellas Australia is the sales and marketing affiliate for Australia and New Zealand. Our operations are conducted from our office in Macquarie Park, Sydney New South Wales.

Astellas Australia imports Astellas products into Australia.

### ***Our Supply Chain***

Astellas Australia's supply chain is comprised of suppliers of indirect goods and services (information technology, professional services, sales and marketing agencies and facilities). Examples of the goods and services procured are in the next section.

The products for which Astellas Australia has marketing authorizations are imported from countries outside Australia such as Ireland, the UK and Japan, then delivered by local wholesalers to hospitals and pharmacies.

### **Potential risks of Modern Slavery practices in our operations and supply chain**

In its Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities (Guidance), the Australian Government acknowledges that Modern Slavery is a complex problem and that Modern Slavery 'can occur in every industry and sector'.

The Australian Government recommends in its Guidance that reporting entities take a 'priorities risk based approach' to assessing Modern Slavery risks including to consider risk factors such as the sector, industry, types of products and services, geographic locations and business models.

For our first reporting year we have conducted a high level review informed by the Guidance and have identified the following risks areas which may present a higher risk of Modern Slavery and may require further assessment:

- **Product and services:** Astellas Australia procures stationery, including for marketing purposes. Paper is globally recognised as a high risk product.
- **Sector and industry risks:** Cleaning and electronics are globally recognised as high risk industries. Astellas Australia uses the cleaning services provided by the building management. Our IT department also procures phone headsets, mobile phones, laptops, monitors and accessories.
- **Geographic risks:** We acknowledge that some countries may have higher risks of Modern Slavery. At this stage we have not conducted risk assessments based on goods and services procured from other countries, which may present higher risks of Modern Slavery.

We will use these potential risk factors to prioritise our supplier engagement activities over the next financial year(s).

At a global level, Astellas has conducted risk assessments to identify Modern Slavery risks in Astellas' operations and supply chain. The risk assessments and the outcomes of those assessments conducted at global level are as follows:

- Astellas has continued to implement a Third Party Lifecycle Management (TPLM) program to manage risk throughout Astellas' third party business partner relationships. As part of the TPLM program, Astellas conducts questionnaire surveys on significant business partners in the Astellas supply chain and assesses them based on their answers before entering into an agreement. Astellas continuously assesses, mitigates and monitors business partners' inherent risk based on the surveys. To date, there have been no negative answers to the critical questions regarding human rights issues.
- In June and July 2019 Astellas conducted its Global Ethics & Compliance 2019 Employee Survey to better understand the Astellas company culture and behaviours, covering a speaking up culture which includes human rights and fair labour matters, and identify potential areas for enhancements to operational excellence and potential risks.

- Astellas also has whistleblowing helplines and in the year ended 31 March 2020 there were no significant human rights issues reported through these helplines.

During the year under review these global performance indicators did not identify any heightened risk of Modern Slavery.

### **Actions taken by us to assess and address risks**

#### ***A group wide approach***

Astellas has taken a global approach to addressing Modern Slavery issues and accordingly Astellas Australia complies with the following group policies that are intended to promote ethical and legally compliant business conduct, respect human rights and manage the risk of Modern Slavery within our own organisation and supply chain. These include:

- [The Astellas Group Code of Conduct](#) states our commitment against forced labour and, in the selection of business partners, their commitment to human rights and labour standards.
- [The Astellas Position on Human Rights](#) emphasizes and expands on our commitment to human rights and high labour standards. This is a commitment that supports embedding respect for human rights throughout the Astellas Group.
- [Astellas Corporate Social Responsibility \(CSR\) Materiality Matrix](#) identifies ‘Human rights in labour’ as one of the ‘Most Important’ material issues in a scale of ‘Important’, ‘Very Important’, ‘Most Important’.

As mentioned above, Astellas has continued to implement the TPLM program to assess and address risks in our third party business partner relationships and conducted a survey to assess and address human rights risks in our operations.

#### ***A speak up culture***

Astellas fosters a speak up culture, which has not identified any actual incidents of Modern Slavery. Astellas employees are required to promptly report any known or suspected violation of the Astellas Group Code of Conduct or other illegal or unethical behaviour or business practice. Therefore, if there are any concerns relating to Modern Slavery, these can be raised in confidence without fear of retaliation directly to a manager or through independent third party and internal whistleblowing helplines. Astellas maintains internal accountability standards and procedures for employees or contractors failing to meet Astellas’ standards regarding Modern Slavery by documenting and / or investigating alleged violations of the Astellas Group Code of Conduct, which can result in disciplinary action in accordance with applicable laws, regulations, and Astellas policies and procedures in the relevant country of employment or assignment.

We understand the need for employee feedback and the right to remedy, and so we have implemented reporting mechanisms through which employees can file complaints, without fear of reprisal and on a confidential basis.

#### ***Training and education***

Astellas provides an e-learning program to introduce the Astellas Group Code of Conduct which states among other things our commitment to respecting human rights including the prohibition of child labour and forced labour once a year. Full-time directors, officers and employees worldwide were required to take this program in the year to 31 March 2020.

#### ***Our Approach to Risk Management***

Our activities to combat Modern Slavery are risk based and will continue to correspond with the level of risk identified. We consider this to be consistent with the Guidance where the Australian Government encourages reporting entities to take a priorities risk based approach.

Pursuant to the Astellas Group Code of Conduct, Astellas selects business partners based on various qualifying criteria, including commitment to human and labour rights and other ethical and social responsibility standards, including past conduct relating to those issues.

Astellas has a whistleblowing helpline link on the Astellas global website to enable reporting of a suspected violation of any Astellas policy, procedure or Astellas Code of Conduct. Anyone can access the whistleblowing helpline link to report any non-compliance. <https://www.astellas.com/en/contact-us>

If Astellas identifies non-compliance with a contractual, legal, regulatory, or industry-based requirement, Astellas works with business partners to correct the issue. If the issue cannot be corrected, Astellas reserves the right to transition to a different partner.

### **Communicating what we are doing**

Astellas Australia intends to publish this statement on our website.

### **Measuring Effectiveness**

In order to monitor the effectiveness of the steps we are taking, we will continue to:

- Monitor Modern Slavery concerns raised with whistleblowing helplines centralized by Astellas;
- Develop a corrective and preventative action plan, including auditing, where we assess that there may be a heightened risk of Modern Slavery with specific business partners.

### **Looking Forward**

In order to raise awareness about the risks of Modern Slavery, we will take the following actions:

- Astellas Australia intends to implement the TPLM program by 31 March 2021 to assess risk, including due diligence, in its supply chain. The TPLM program is currently being used by other entities in the Astellas group to ensure compliance with the requirements which must be met throughout a third party business partner relationship, so that Astellas is appropriately managing risk throughout the lifecycle of an engagement with respective third party business partners. These programs are managed by risk expert departments, which are separated from operational business functions. The TPLM program includes a risk domain matrix with considerations for core labour rights and human rights, including freely chosen employment.
- As part of the TPLM program, Astellas Australia will (i) conduct questionnaire surveys on significant business partners in our supply chain and assess them based on their answers before entering into an agreement and (ii) require compliance with the Astellas Business Partner Code of Conduct, which is an Astellas group policy that references the human rights of workers and specifically prohibits business partners from using forced, bonded or indentured labour, involuntary prison labour or child labour.

### **Consultation**

Astellas Australia does not own or control other entities and accordingly consultation for the purpose of the Act was not required. We did, however, consult and work with Astellas Pharma Inc on developing this statement.

## **Other relevant information**

### ***Impacts of Covid-19***

In order to secure the safety of our employees and to prevent the further spread of the disease, in accordance with the situation, Astellas is currently advising employees, except those instructed by Astellas to do otherwise, to continue working from home by using online digital tools.

We understand that Covid-19 has increased the risk of people around the world becoming victims of modern slavery. Astellas Australia will continue to take measures to address Modern Slavery risks in our operations and supply chain, including implementing the TPLM program as planned.

### ***Modern Slavery laws in other jurisdictions***

Other Astellas group companies are also required to comply with Modern Slavery laws in other jurisdictions. Astellas Australia has had the benefit of working closely with Modern Slavery law experts in other jurisdictions.

In addition, Astellas Australia is sharing information about the Australian regime with other Astellas group companies in recognition that the Act is considered by global civil society groups as a significant “step up” in Modern Slavery law reporting requirements. We hope that this knowledge sharing will contribute in a meaningful way to the development of relevant policies and procedures.

This statement was approved by the board of directors of Astellas Pharma Australia Pty Ltd on 28 September 2020.



Elizabeth Marett

Director

Astellas Pharma Australia Pty Ltd

28 September 2020

Astellas Pharma Australia Pty Ltd. Registered in New South Wales number ABN 81 147 915 482 with registered office at Level 3, 6 Eden Park Drive, Macquarie Park NSW 2113 Australia.