

Work with **Integrity**.
Innovate with Purpose.
Impact Patient Lives.

The Astellas Code Of Conduct



1.
We do what
is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly

Dear Colleagues,

Work with Integrity. Innovate with Purpose. Impact Patient Lives.

At Astellas, we believe that **a culture driven by Integrity, Innovation and Impact is essential for creating and delivering VALUE for patients.** These Organizational Values define Astellas' culture and form the foundation of our commitment to patients and our long-term success.

Integrity is our first value because it is vital for making the right decisions that positively affect patients and stakeholders. It serves as our compass, empowering us to innovate quickly and ethically while understanding our boundaries. **Doing what is right is the foundation of our company.**

The Astellas Code of Conduct ("Code") outlines the core standards that guide our daily business practices.

It defines the principles and expectations for ethical behavior throughout our organization. The Code reinforces our commitment to integrity and helps us make ethical decisions with confidence.

Integrity at Astellas requires everyone's participation. It inspires us to be courageous and act ethically in real time, creating meaningful impact and results.

Collaboration is key to our success. By working together, teams can use their diverse perspectives and expertise to enable innovation through purposeful actions. We show our trustworthiness by following through on our commitments and taking accountability.

With a "One Astellas" mindset, **we share the responsibility to navigate ethical dilemmas together** and make the right choices that improve patient well-being.

We all contribute to fostering an environment where integrity thrives and collaboration flourishes. Thank you for your dedication to Astellas, our culture of integrity, and the patients who depend on us. Together, we can continue to drive innovation and make a positive impact on their lives.



Naoki Okamura
President and Chief
Executive Officer (CEO)



Tatjana Dragovic
General Counsel & Chief Ethics &
Compliance Officer (GC & CEEO)



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is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly

Contents

We do what is right

Our Value of Integrity	04
Astellas' Code of Conduct	05
We are all responsible	06
We have the courage to speak up	07

We support and respect each other

We create a positive and respectful work environment	09
We create a safe and healthy workplace	11
We are ethical managers	12
We serve our communities and society	13

We improve lives

We are committed to ethical research and development	15
We ensure product quality	15
We collect safety information and report adverse events	16
We make our study findings available	16

We conduct business the right way

We promote and communicate ethically	17
We compete fairly	17
We prohibit bribery and corruption	18
We engage healthcare professionals ethically	19
We operate with transparency	20

We build strong business partnerships

We select business partners appropriately	21
We take responsibility for business partners' conduct	21
We prioritize strong ethical relationships and proper documentation	22
We ethically engage in international business and trade compliance	22

We are truthful and compliant

We avoid conflicts of interest	23
We disclose secondary employment	23
We ensure compliance investigations are fair	24
We are dedicated to truthful and compliant corporate disclosure	24
We cooperate with government inquiries and investigations	24
We comply with legal hold orders	25
We firmly reject engagement with organized crime	25

We process data and information responsibly and we keep it safe

We protect intellectual property	26
We keep information confidential	26
We safeguard personal information	27
We use information systems and devices properly	27
We do not share non-public information or participate in insider trading activities	28
We keep records and financial Integrity	28

We innovate responsibly

We use artificial intelligence ethically	29
We use data responsibly and ethically	30

1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
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1. We do what is right

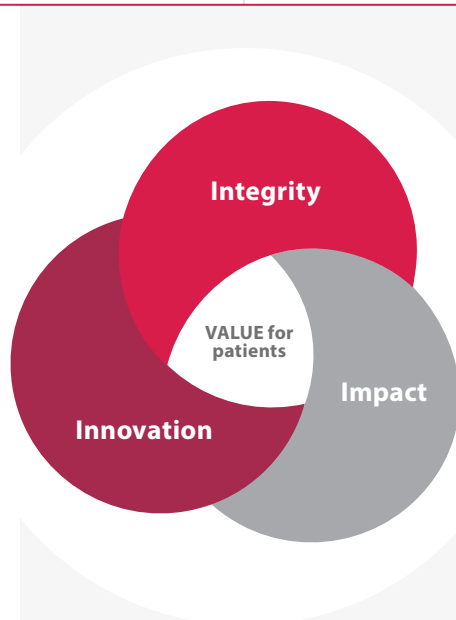
Our Value of Integrity

At Astellas, we are dedicated to turning innovative science into VALUE for patients, and fostering a culture driven by our three Astellas Organizational Values: Integrity, Innovation, and Impact.

By prioritizing these Values, we ensure that patients can rely on us for safe, effective, and meaningful healthcare solutions.

These high-level principles guide our actions and serve as the foundation of our culture. Through our commitment to these Values, we ensure that patients can rely on Astellas for safe, effective, and meaningful healthcare solutions.

We intentionally selected Integrity as our first core Value because doing what is right is the foundation of Astellas. This commitment extends beyond compliance with laws and regulations; it requires us to embody the spirit of the law and make ethical decisions in every aspect of our work. Acting with integrity is critical for us to positively impact our patients and stakeholders.



Our Organizational Values

- 01 *Integrity*
Doing what is right is the foundation of our company.
- 02 *Innovation*
Continuously imagining ways to create and deliver VALUE to our patients.
- 03 *Impact*
Taking purpose-driven action to bring VALUE to patients.

Work with Integrity. Innovate with Purpose. Impact Patient Lives.



How can we live out our Organizational Values through our work?

We all have a part to play in living our Values. To activate our Organizational Values in the way we work day-to-day, we have identified five Organizational Behaviors that are action focused. Together they define the requirements for effective performance across our organization.

Courage

Creating and delivering VALUE through bold and ethical decisions, intelligent risks, and challenging the status quo – even when doing so may feel uncomfortable.

Sense of Urgency

Focusing on speed, agility, and integrity to expediently achieve individual, team and organizational goals. Understanding that perfection can be the enemy of progression.

One Astellas

Leveraging the diverse perspectives, skills, and resources across Astellas to achieve organizational goals and cross-functional objectives. Realizing that more can be achieved together, than alone.

Outcome Focus

Rigorously prioritizing effort and resources to create impact and achieve measurable end results.

Accountability

Individually contributing to the Astellas culture by having a personal brand built on ownership, integrity, and trust. Owning the results of the decisions we make.



1.
We do what
is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
responsibly

8.
We innovate
responsibly

Astellas' Code of Conduct ("Code")

This document is Astellas' Code of Conduct, which we call the "Code".

The Code was co-created by over one hundred employees and subject matter experts globally and cross-functionally across the company.

While the Code may not cover every situation, doing what is right – guided by ethical principles – protects Astellas' reputation of trust and contributes to patient well-being. The Code:

- **Outlines the core standards** for our daily business practices, ensuring a culture of integrity that is both ethical and compliant.
- **Serves as a guide** for navigating ethical dilemmas, aligning our decisions with our commitment to integrity and patient well-being.
- **Defines the principles** and expectations for ethical behavior within our organization.
- **Activates and embeds** Astellas' Organizational Values and Behaviors.



1.
We do what
is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly

We are all responsible

We all want to make a difference in the world. To work for a cause we can believe in, that speaks to the heart and inspires us into action.

- + **We all share responsibility** for maintaining high ethical standards across Astellas.
- + **Upholding our Code** fosters a culture of integrity that enhances our global reputation and creates an environment where ethical behavior thrives, ultimately driving VALUE for patients.
- + **We all share responsibility** for our success by challenging the status quo and maintaining high ethical standards at every level of the organization.
- + **We create a culture** built on ownership, integrity, and trust, owning the results of the decisions we make.
- + **Our Code applies to all Astellas**, including employees (full-time and part-time), directors, officers, temporary staff, and third parties representing Astellas.

- + **When we say “Astellas,” we mean Astellas Pharma Inc.** and all its global affiliates and subsidiaries. It’s important to remember that violations of this Code can result in disciplinary action in accordance with local laws and our company policies.
- + **As part of our commitment to integrity**, we all are responsible for understanding and following the Code, and adhering to applicable laws, regulations, and company policies.
- + **Astellas’ Ethical Decision-Making Framework (EVR)** serves as our guiding model for evaluating situations through the perspective of Ethics (E), our Organizational Values (V) and associated Risk (R). This framework enables us to identify the most appropriate course of action moving forward.
- + **If you’re ever uncertain about the right course of action**, please seek guidance from your manager or a member of [Ethics & Compliance](#), [Legal](#), or [Human Resources](#).

“At Astellas, patients are our purpose and the driving force behind our ambition to pioneer science for those living with serious illnesses.”

Head of Astellas Patient Centricity



[Learn More](#)

[Astellas’ Organizational Values and Behaviors](#)

[Astellas’ Ethical Decision-Making Framework \(EVR\)](#)

[Astellas Group Global Conflicts of Interest Policy](#)



1.
We do what
is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
responsibly

8.
We innovate
responsibly

We have the courage to speak up

We require employees promptly to speak up about any known or suspected activity that doesn't feel right, including:

- Potential policy violations, illegal or unethical behavior
- Situations that do not align with our commitment to respect and fairness
- Pressure or inappropriate influence by a business partner
- A personal conflict of interest, or with others, or a business partner
- An Astellas invention or work that may need patent or copyright protection
- A cyber security incident, information security incidents caused by third parties, a lost device, a data privacy incident, and any loss or compromise of personal information
- An Adverse Event or Safety Concern



"I encourage my team to challenge each other, and challenge me, as that's what drives innovation. I always stress they should be open minded, objective and acknowledge pros and cons. Your way isn't always the right way."

Astellas manager on "Courage"



What is Astellas' non-retaliation policy?

Astellas strictly prohibits retaliation or retribution against anyone who, in good faith, raises a compliance concern, or cooperates with a company investigation into alleged misconduct. Employees have protection against retaliation even if their reported concern turns out to be mistaken or unsubstantiated.



1.
We do what
is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly

How to speak up

You can raise concerns through any of our multiple reporting channels, including:

- Your line manager
- Your [Ethics & Compliance \(E&C\) Business Partner](#)
- Any member of [Ethics & Compliance \(E&C\), Legal](#), or [Human Resources \(HR\)](#)
- The [Global Investigation Management Team](#) (GIMT)
- [EthicsPoint](#), operated by a third-party, NAVEX
- Other relevant functions

Use the [Speak Up Discussion Guide for Employees](#) if you're unsure how to start the conversation.

EthicsPoint Hotline

[EthicsPoint](#) is available online or by phone **24 hours a day, 7 days a week.**

Anyone (including external parties) can make a report, seek advice or make an inquiry.

You can remain anonymous, where permitted by local laws and regulations.

Further information on how reports are handled can be found via this link: [Speak Up, Whistleblowing & Internal Investigations](#).

If there is an immediate threat to life or property, contact local authorities.



Prefer to use your mobile? Scan here to access EthicsPoint

Other important reporting responsibilities

Report Information Security/Data Privacy Incidents
including a cyber security incident, an accident caused by third parties, a lost device, a data privacy incident, and any loss or compromise of personal information

Report immediately through one of these options:

Using the relevant Form in the Digital Desk: [Information Security/Data Privacy Incident](#)

Email: [E&C Data Privacy Office](#)

For data privacy incidents, you can also send an email to the E&C Data Privacy team at dpi@astellas.com or email the [E&C Data Privacy Office](#)

Report any Adverse Events or Safety Concerns

Report via [Pharmacovigilance](#) within 24 hours

Report any issues with data integrity, quality, or regulatory compliance

Report via [Product Complaint Inquiry Portal](#) within 24 hours
A member of [Quality Assurance](#) within 24 hours



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

2. We support and respect each other

We create a positive and respectful work environment

We are dedicated to fostering a workplace where everyone is treated with fairness, respect, and dignity. We believe that a positive work environment is essential for collaboration and innovation.

Our commitment includes:

+ **We adhere to internationally recognized human rights and labor standards**, including the United Nations Global Compact's ten principles, of which Astellas is proud to be a signatory, as well as local labor and employment laws. This commitment prohibits child labor and forced labor, supports workers' rights to free association and collective bargaining, and eliminates workplace discrimination. We expect our business partners to uphold these fundamental human rights and labor standards as well.

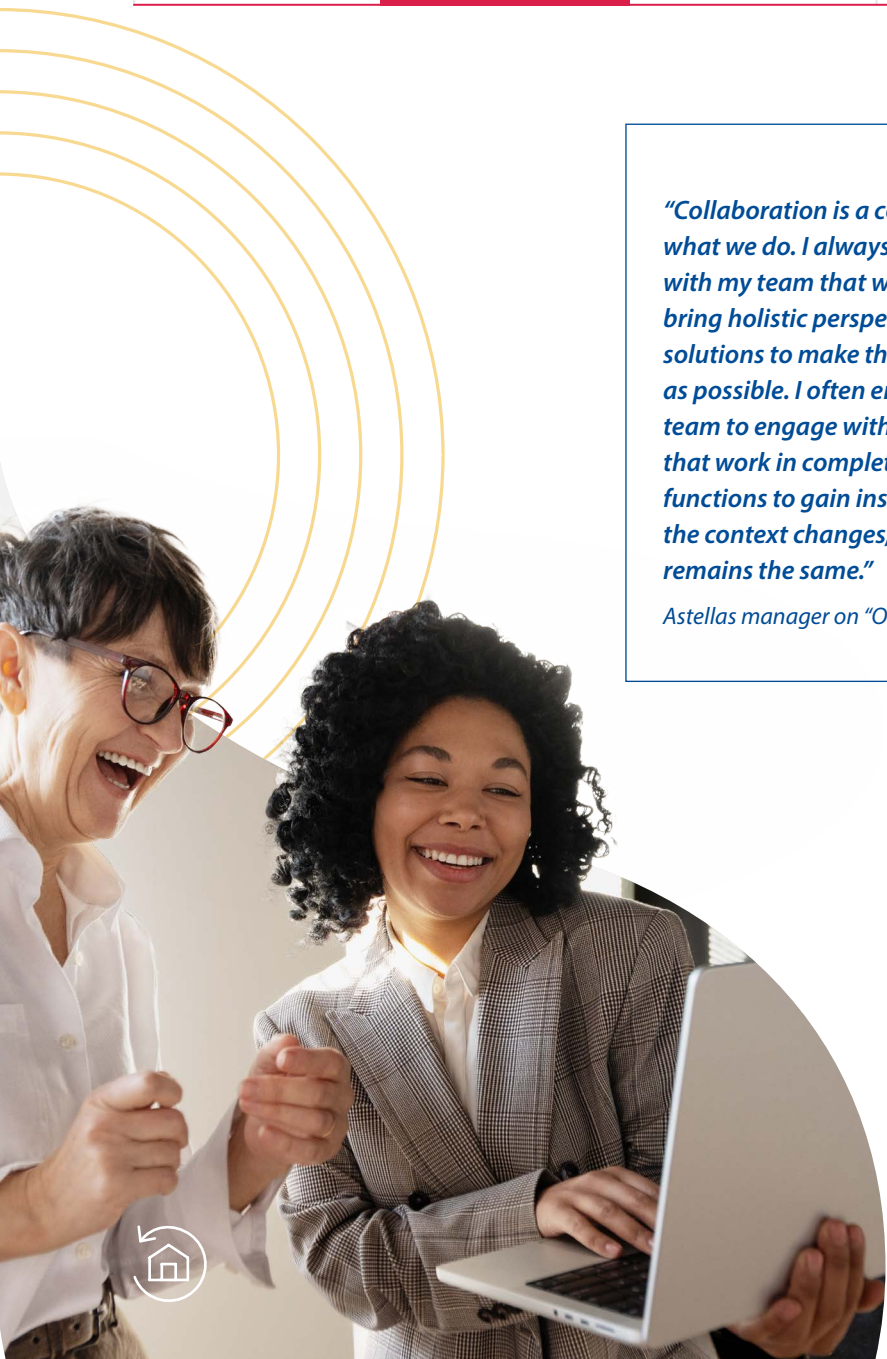
+ **We fairly provide equal employment opportunities** and support skill enhancement for all employees. Employment decisions, including recruitment, promotion, and performance evaluations, are based on skills, experience, and work performance, in line with local laws.

+ **We value all individuals** regardless of any protected characteristics such as age, color, disability, gender identity, marital status, nationality, race, religion, sex, or sexual orientation. We actively promote an inclusive culture where everyone feels valued and inspired to contribute their best. This commitment extends to our business partners as well.

Continued on next page →



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------



“Collaboration is a core tenet of what we do. I always reinforce with my team that we need to bring holistic perspectives to solutions to make them as robust as possible. I often encourage my team to engage with colleagues that work in completely different functions to gain insight; while the context changes, the intent remains the same.”

Astellas manager on “One Astellas”

- + **We prevent discrimination and harassment** and do not tolerate them in any form. Employees are encouraged to report any incidents of discrimination or harassment to their manager or Human Resources. We take all reports seriously and will conduct thorough investigations.
- + **We provide training to all employees** on recognizing and preventing harassment and discrimination, ensuring that everyone understands their rights and responsibilities in this area.
- + **We offer flexible work arrangements**, including relocation and remote work where possible, to support work-life balance and enable our employees to excel both professionally and personally.



What does One Astellas mean?

“One Astellas” means we leverage the diverse perspectives, skills, and resources across Astellas to achieve organizational goals and cross-functional objectives. Realizing that more can be achieved together, than alone.

1.
We do what
is right

2.
We support
and respect
each other

3.
We improve
lives

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly

We create a safe and healthy workplace

The workplace health and safety of our employees, contractors, and visitors is our top priority. We are committed to providing a safe and healthy work environment and to proactively identifying and mitigating risks in compliance with health and safety regulations.

+ Proactively Identifying Risks:

We engage in ongoing training and incident reporting to prevent work-related injuries and illnesses. Everyone is encouraged to participate in our safety efforts by reporting unsafe activities.

+ Employee Participation:

We provide ongoing training, including incident reporting training, aiming to prevent work-related injuries and illnesses. We encourage everyone to participate actively in our safety efforts by reporting unsafe activities.

+ Zero Tolerance for Unsafe Behavior:

Astellas does not tolerate unsafe, violent, or disruptive behavior. Employees must not work under the influence of illegal drugs, alcohol, or any substances that impair job performance, or that could reflect poorly on the company. Alcohol consumption is only allowed at approved company-sponsored events.



[Learn More](#)

[Respect for Human Rights Policies and Position Statement](#)

[Astellas Global Policy on Respect in the Workplace/ Prevention of Discrimination and Harassment Policy](#)

[The Ten Principles of the United Nations Global Compact](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	-----------------------------------	-------------------------------

We are ethical managers

Ethical managers play a crucial role in fostering a culture of integrity and role modeling the Astellas Organizational Values and Behaviors.

Ethical leadership strengthens our organization, enhances workplace and stakeholder relationships, and adds VALUE for patients. **Our expectations for ethical managers include:**

1. **We are role models (Accountability):**

We lead by example by making intelligent, integrity-driven decisions, demonstrating ethical behavior in all our actions, and instilling integrity and trust within our team.

2. **We empower and develop**

(Outcome Focus): We ensure our team members fully understand relevant laws, regulations, and company policies through effective training and development. This fosters high-impact teams with purposeful development and growth opportunities.

3. **We review conduct regularly**

(Outcome Focus): We continuously assess our team's practices to ensure compliance, on-time training, and uphold ethical standards.

4. **We foster psychological safety**

(Courage): We create an environment where team members feel safe to voice their opinions, ideas or concerns and to challenge the status quo. We encourage our team to engage in open dialogue without fear of negative repercussions.

5. **We address issues and respond promptly (Sense of Urgency):**

We respond swiftly to compliance or ethical issues or conflicts, escalating them as needed, and consulting with relevant departments such as E&C, Legal or HR.

6. **We promote collaboration and different perspectives (One Astellas):**

We foster an inclusive environment that values open exchange of ideas and encourages cross-functional teamwork to solve complex problems.



"I aim to make myself highly available and responsive, and involve my team in high-impact projects aligned with both personal growth and organizational strategy. I also always encourage the team to co-own the factory's future and see themselves as part of broader transformation efforts."

Astellas manager on "One Astellas"



*Need to hold a **Speak Up** conversation?*

Refer to the [Speak Up Discussion Guide for Managers](#).

If you're unsure about resolving a concern, consult your HR partner.



Learn More

For more information, visit the [Managers' Corner](#).



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We serve our communities and society

We recognize our responsibility as a corporate citizen and actively engage with our communities.



"We are so pleased with the partnership we have developed with Astellas that has enabled us to help countless bladder cancer patients and those who love them."

*Chief Executive Officer,
Bladder Cancer Action Network*

- + **We support local communities and participate in non-commercial activities** that positively impact society through financial contributions, product donations, and employee volunteering, all aligned with our mission to enhance public health. We do this in accordance with applicable local laws.
- + **We strive to minimize our environmental impact** and address global challenges, such as climate change and resource recycling, by conducting business sustainably.
- + **We provide sustainability contributions.** Requests for grants or support are carefully evaluated based on legitimate purposes, and never as inducements for use of our products, maintaining our independence from the recipients' activities.

Continued on next page →



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------



“For our organization, meaningful partnerships are centered around respect, innovation and common goals. Our engagement with Astellas has exceeded our expectations for meaningful partnerships and we are honored to help improve the lives of men with prostate cancer and their families with the support of Astellas.”

President, Prostate Conditions Education Council

+ **We comply with local laws regarding political activities**, including contributions and lobbying. Only authorized Astellas representatives may discuss legislation or policy issues with governments or public bodies on Astellas’ behalf, ensuring that all such communications are truthful and well-supported.

+ **We respect the right and freedom of individuals to engage responsibly in personal political activities** as long as they do not appear to act as a representative of Astellas. Additionally, company resources (e.g., funds, facilities, or work time) cannot be used for personal political activities unless authorized by local policies.



Learn More

[Astellas’ Sustainability Initiatives](#)



1.
We do what
is right

2.
We support
and respect
each other

3.
**We improve
lives**

4.
We conduct
business the
right way

5.
We build
strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly



*Our commitment to
quality is critical because
patients rely on us for
life-saving treatments.*

3. We improve lives

We are committed to ethical research and development

- + **We uphold the highest scientific and ethical standards** in our pharmaceutical research and development practices. We comply with internationally accepted guidelines, including the International Council for Harmonization (ICH) and the Declaration of Helsinki, as well as applicable laws, regulations, and industry codes.
- + **We ensure scientific rigor by managing data responsibly**, maintaining accurate records, and addressing potential bias and conflicts of interest. Fabrication, falsification, and plagiarism are strictly prohibited.
- + **We follow high ethical standards** and biosafety guidelines in our stem cell research.

- + **Our clinical trials prioritize participant health and safety**, ensuring dignity, privacy, and confidentiality, with informed consent obtained from all participants. Clinical trials are not used as an inducement to healthcare professionals regarding use of our products or to obtain any other improper advantage for Astellas.

- + **We provide adequate training** for clinical investigators and site staff.



Learn More

[Astellas Safety Team
\(Regulatory Affairs &
Pharmacovigilance \(RAPV\)\)](#)

[Product Complaint
Inquiry Portal](#)

[International Council
for Harmonization](#)

[Declaration of Helsinki](#)

We ensure product quality

Our top priority is ensuring an uninterrupted supply of high-quality, safe, and effective products for patients worldwide. We ensure the efficacy, safety, and reliability of our life-saving treatments.

- + **Quality is a shared responsibility**, and all product complaints must be promptly communicated to the Astellas Safety Team (Regulatory Affairs & Pharmacovigilance (RAPV)).
- + **Any issues related to data integrity, quality or regulatory compliance** should be reported to the Product Complaint Inquiry Portal. Your diligence helps us to address potential product risks proactively and uphold our commitment to patient safety.
- + **We provide transparent communication**, following all applicable laws, in the case of any supply interruption.

1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We collect safety information and report adverse events

- + **We are dedicated to continuously monitoring the safety** of our products throughout their lifecycles, as product safety profiles can change post-marketing.
- + **We collect, evaluate, and report product safety information** promptly to health authorities worldwide. This is crucial for maintaining patient safety and trust, and it ensures our compliance with applicable laws and regulations.
- + **We report adverse events or other safety information** related to an Astellas product within 24 hours to Regulatory Affairs & Pharmacovigilance (RAPV), in accordance with the Astellas Corporate Pharmaceutical Product Safety Policy.

What is an Adverse Event?

Any untoward medical occurrence in a patient or clinical investigation subject administered a pharmaceutical product and which does not necessarily have a causal relationship with this treatment. An adverse event (AE) can therefore be any unintended sign (including an abnormal laboratory finding), symptom, or disease temporally associated with the use of a medicinal (investigational) product, whether or not related to the medicinal (investigational) product.

We make our study findings available

- + **We are committed to making our study findings widely available, regardless of outcomes.** Disclosing accurate and balanced information about our medical research is crucial for fostering transparency and trust, in accordance with applicable laws, regulations, industry codes, and company policies.
- + **We fully disclose our funding for Astellas-sponsored research and publications** to address potential conflicts of interest. We adhere to the authorship criteria recommended by the International Committee of Medical Journal Editors (ICMJE) and prohibit ghostwriting.
- + **We prioritize the privacy of research subjects and prevent copyright infringement and premature patent disclosures.** By upholding these principles, we enhance the trust and credibility placed in Astellas.



Learn More

[Astellas Corporate Pharmaceutical Product Safety Policy](#)

[International Committee of Medical Journal Editors \(ICMJE\)](#)

[Regulatory Affairs & Pharmacovigilance \(RAPV\)](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------



A sales leader had a friend at a competitor pharmaceutical company who offered to provide confidential product sales data for hospitals in a specific region. Recognizing the obvious conflict of interest and that it violated fair-trade laws and Astellas policy, the manager declined the offer to receive the data.

4. We conduct business the right way

Our commitment to Integrity, Innovation, and Impact drives us to make purpose-driven decisions that benefit our patients and stakeholders. We believe that ethical practices are essential for building trust and maintaining our reputation in the healthcare industry.

By fostering ethical, transparent, and respectful relationships, we can work together to enhance patient care and drive positive health outcomes.

We promote and communicate ethically

- + **We promote only approved product uses and engage in lawful practices**, ensuring our promotional materials are truthful, accurate, balanced, not misleading, scientifically supported, and on-label.
- + **All materials must complete a rigorous internal materials review process**. We do not make unsubstantiated claims regarding our products or misleading comparisons with competitor products. For more information, please visit the [STAR Hub](#).
- + In non-promotional contexts (e.g., financial statements, clinical trial disclosures, scientific publications, and in response to unsolicited requests for medical information), **we share product information responsibly** without promoting specific products. Our non-promotional communications also adhere to high standards of truthfulness.

We compete fairly

We prioritize fair competition by adhering to competition laws in all operating countries. If you're ever uncertain about the right course of action to ensure fair competition, seek guidance from Legal. Our approach includes:

- + **Legal Compliance**: We collect information about other companies lawfully and report any suspected unlawful collection to Legal.
- + **Transparency Agreements**: Agreements with competitors on pricing, sales terms, or marketing require Legal approval. Any discussions that could be perceived as agreements must be reported.
- + **Ethical Conduct**: At industry meetings, we remain cautious of anti-competitive discussions and avoid arrangements with customers, suppliers, or distributors that unfairly exclude competitors or harm customers or patients. Legal consultation is necessary for contracts with restrictive provisions, such as exclusivity or non-compete clauses.



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We prohibit bribery and corruption

We adhere to all relevant anti-bribery and anti-corruption laws, including the UK Bribery Act and the US Foreign Corrupt Practices Act (FCPA). These laws apply both domestically and internationally. Our Global Policy Anti-Bribery, Anti-Corruption Compliance includes these principles:

- + **Zero Tolerance:** We do not, directly or indirectly, offer, promise, or give any payment or other item of value to any person, whether a government official or private individual, for the purpose of obtaining or retaining business or improperly influencing any decision or action of the recipient in our favor.
- + **Government Officials:** Interactions with government officials (where permitted) must be for legitimate business reasons, ensuring no improper advantage is gained. All payments and transfers of value must be transparent and reflect [Fair Market Value \(FMV\)](#).
- + **Third-Party Conduct:** We hold our third parties accountable to our standards and prohibit them from engaging in activities that we prohibit for our own employees. We conduct thorough due diligence to assess risk and evaluate third parties' ability to meet Astellas' business requirements, local laws and industry codes, and to ensure they do not engage in bribery on our behalf.

Click [here](#) to learn more about Anti-Bribery Anti-Corruption Compliance at Astellas



[Learn More](#)

[Global Policy Anti-Bribery and Anti-Corruption Compliance](#)

[STAR Hub](#)

[Tokyo Principles for Strengthening Anti-Corruption Practices](#)

[UK Bribery Act](#)

[United Nations Global Compact](#)

[US Foreign Corrupt Practices Act](#)

[Astellas Legal](#)

[Interactions with Government Officials](#)

1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We engage healthcare professionals ethically

Our engagement with healthcare professionals (HCPs) is based on integrity and a shared commitment to improving patient care. When we engage HCPs as consultants, speakers, advisory board members, or clinical investigators (Fee for Service), the following conditions must be met:

- + **Legitimate Business Needs:** Interactions with HCPs are for legitimate business needs only.
- + **Transparency and Compliance:** We uphold ethical standards and do not engage in activities that improperly influence HCPs, such as offering payments or gifts for prescribing Astellas products.
- + **Selection Criteria and Fair Market Value (FMV):** HCPs must be selected based on their qualifications, expertise, and experience. Compensation must reflect FMV for services provided. Find more information about FMV on the [STAR Hub](#).

+ **Written Contracts:** All engagements with HCPs must be documented in written contracts that outline the required services and compensation, ensuring compliance with company policies and legal regulations.

What is a Healthcare Professional (HCP)?

HCPs include anyone who can prescribe, purchase, recommend, supply, or administer Astellas products, including those involved in related medical research. For example: medical, dental, pharmacy, nursing professionals, and formulary decision-makers.

For more information on appropriate meeting venues, travel and expenses, refer to our company policy on engaging healthcare professionals and visit the [STAR Hub](#).



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------



Our engagement with healthcare professionals is rooted in integrity and a shared commitment to improving patient care.

We operate with transparency

Astellas is dedicated to transparency in our interactions with healthcare professionals (HCPs) and upholding the highest integrity standards.

- + **We maintain timely and accurate records of HCP interactions and calls**, samples, payments and other transfers of value to ensure transparency and accountability. Transparency helps us build trust with HCPs and the communities we serve.
- + **We comply with all applicable laws, regulations, and industry codes** and timely and accurately disclose payments and other transfers of value to HCPs and healthcare organizations. Applicable reporting requirements include, but are not limited to, the Corporate Sustainability Reporting Directive, Japan Pharmaceutical Manufacturers Association (JPMA) Transparency Guidelines, European Federation of Pharmaceutical Industries and Associations (EFPIA) Disclosure Code, and the United States Sunshine Act.



Learn More

[European Federation of Pharmaceutical Industries and Associations \(EFPIA\) Disclosure Code](#)

[Japan Pharmaceutical Manufacturers Association \(JPMA\) Transparency Guidelines](#)

[US Sunshine Act](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

5. We build strong business partnerships

- We engage with all business partners fairly and with integrity, fostering relationships built on trust and mutual respect. We also expect high ethical standards from our partners.
- We drive innovation, enhance product quality, and improve patient care, positively impacting the healthcare landscape.

Who are our partners?

Our partners include suppliers, service providers, contract research organizations, contract manufacturing organizations, contract sales organizations, research and development collaborators, co-promotion partners, licensed distributors, and wholesalers.

We select business partners appropriately

- + **We prioritize selecting business partners who share our values.** Our selection criteria extend beyond price and quality; we also consider capability, reputation, and past performance of potential partners.
- + **We are committed to ethical practices,** including anti-corruption, human rights, environmental protection, and social responsibility.
- + **To meet our ambitious carbon reduction goals,** we collaborate with partners who enhance transparency and foster innovation. We conduct thorough due diligence to ensure we choose the right partners, always prioritizing Astellas' best interests.
- + **We build effective partnerships** with stakeholders to drive innovation.

We take responsibility for business partners' conduct

- + **The actions of our business partners** can impact our company's reputation and liability.
- + **We avoid any appearance** of directing, authorizing, or condoning illegal or unethical activities by our business partners.
- + **We ensure that our business partners adhere to all applicable laws,** regulations, industry codes, and their contractual obligations to Astellas, in alignment with our company policies.
- + **We promptly report any compliance issues we notice** or become aware of with a business partner to our manager of the appropriate function.



1.
We do what
is right

2.
We support
and respect
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3.
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4.
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business the
right way

5.
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strong business
partnerships

6.
We are truthful
and compliant

7.
We process data
and information
responsibly

8.
We innovate
responsibly

We prioritize strong ethical relationships and proper documentation

- + **We ensure business arrangements with third parties** are supported by clear contracts that outline material terms and conditions that foster transparency and trust.
- + **We negotiate fairly**, ensuring compensation reflects the fair value of goods or services.
- + **We act with integrity** and avoid imposing disadvantages over the other party, even when Astellas is in a stronger bargaining position.

We ethically engage in international business and trade compliance

Our commitment to responsible business includes strict adherence to all relevant trade control laws that support public health, foreign policy, and national security.

For more information, contact the [Ethics & Compliance International Trade Compliance \(ITC\) team](#) or your [Ethics & Compliance Business Partner](#).

If you are considering expanding our operations through third-party distributors, consult with [ITC](#), [Legal](#), [Regulatory Affairs & Pharmacovigilance \(RAPV\)](#), [Treasury & Tax](#), and other experts before proceeding.

- + **We follow our International Trade Compliance (ITC) policy**, which requires following applicable laws when engaging with third parties and moving goods, materials, technology, and pharmaceutical products internationally.
- + **We obtain necessary licenses and permits** before importing, exporting, or transferring items domestically.
- + **We provide accurate information** to customs authorities.



[Learn More](#)

[Global International Trade Compliance Policy](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

6. We are truthful and compliant



An employee considered engaging in an Astellas contract with a close family friend who owned a successful company. However, after consulting with their E&C Business Partner and noting a reasonable alternative source, they decided to avoid the contract to prevent any appearance of favoritism or unfairness.



Learn More

[Astellas Group Conflicts of Interest Policy](#)

We avoid conflicts of interest

- + **We avoid any personal interests** that could potentially conflict with Astellas' best interests. Conflicts of interest can be actual or perceived. Even if there is no intention to create a conflict, we could find ourselves in situations that appear to compromise our impartiality or commitment to our job responsibilities, ultimately harming Astellas' interests.
- + **We pay attention to common situations** that may lead to conflicts of interest. While some conflicts must be strictly avoided, many can be effectively managed through full disclosure and other corrective actions. Transparency is key.
- + **If you believe a conflict of interest exists or may arise**, promptly contact your manager, Ethics & Compliance, or Human Resources for guidance. For more information, please refer to Astellas' Conflicts of Interest Policy.

We disclose secondary employment

- + **Astellas requires full transparency**, and timely reporting of any second job or external position, even if you are self-employed, in accordance with applicable local laws.
- + **To ensure a clear distinction** between your Astellas responsibilities and the proposed external activity, we consider the nature of each role and whether the outside position could negatively impact your Astellas duties or compromise the confidentiality of Astellas sensitive information.
- + **If you have or are thinking about pursuing a second job**, please reach out to your line manager and HR or E&C Business Partner for approval. You may email: Astellas [Conflict of Interest Disclosures](#) for guidance.



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

Trust is crucial not only for our reputation but also for ensuring that patients receive safe and effective treatments.

We ensure compliance investigations are fair

- + **Astellas has a global investigation process to address employee concerns**, often called a Speak Up or Whistleblowing Report.
- + Our global investigation process **ensures that reported concerns are handled in a thorough, fair, objective and respectful manner**, protecting the company employees, and the patients we serve. For more details on the global investigation process or expectations during an investigation, click [here](#).
- + **Investigations adhere to globally consistent standards** and comply with all applicable local laws and regulations.

We are dedicated to truthful and compliant corporate disclosure

- + **We provide clear, accurate, and timely information** to our customers, shareholders, investors, and the public while adhering to all relevant laws and stock exchange rules.
- + **Before sharing any public information**, such as press releases, financial statements, or website content, we conduct thorough reviews to ensure compliance and accuracy.
- + **When using social media, we act responsibly** to protect Astellas' reputation and safeguard confidential information. We follow global policies on ethical social media use by individuals and through official social media accounts.
- + **Only authorized Astellas representatives may speak on behalf of the company** publicly (e.g., media and investors). Inquiries from the media or investors must be directed to our [Corporate Communications team](#).

We cooperate with government inquiries and investigations

- + **We are committed to cooperating fully** in all government inquiries and investigations, providing accurate information, and avoiding false statements.
- + **As an employee, it's crucial that we do not alter, destroy, or conceal any documents** related to these inquiries, and comply with all legal hold orders.
- + If an inquiry or investigation arises, **we will assess the validity of the allegations and defend our interests** while cooperating in good faith.
- + **We adhere to local laws**, regulations, and codes regarding interactions with government officials.



Learn More

[Global Social Media Policy for Individuals](#)

[Global Policy on Astellas Official Social Media Accounts](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

Our dedication to Integrity empowers us.

We comply with legal hold orders

- + To protect Astellas' **integrity** and reputation, **we follow the terms of all legal hold orders** until we receive a lift notice from the Legal team. Our diligence in this process safeguards Astellas.
- + **We preserve relevant information**, regardless of where it is located.
- + **We respond appropriately to legal inquiries** and maintain transparency, supporting our mission to provide safe and effective treatments to our patients.

We firmly reject engagement with organized crime

- + **We actively promote a culture that supports legal and responsible business practices.** Our dedication to integrity empowers us to take proactive legal actions to protect our company and employees from any potential threat.
- + **We firmly reject any engagement with organized crime groups** (or companies known to have close ties to organized crime) and reject illegal business dealings, funding, or unreasonable demands from such groups.



Learn More

[Legal Hold Orders](#)

[Global Policy Anti-Bribery, Anti-Corruption Compliance](#)

1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

7. We process data and information responsibly and keep it safe

We protect intellectual property

Valuing and protecting our intellectual property (IP) is crucial for maintaining Astellas' competitive edge.

IP includes patents, trademarks, trade secrets, copyrights, and other creative works that drive Innovation, one of Astellas' Organizational Values.

- + **If you create a potentially protectable invention or work** while working for Astellas, report it promptly, as the company retains rights to these creations per our policies.
- + **We take all necessary steps to safeguard our IP**, especially for new medicines; we are careful and avoid disclosing any patentable inventions before they are officially filed.
- + **We respect the IP rights of others** and must consider these rights in our daily work.
- + **We contribute to Astellas' mission of innovation and excellence**, ensuring that we continue to lead in advancing healthcare.

We keep information confidential

- + **We protect the confidentiality** of both Astellas' and third parties' confidential information and treat it as such until authorized otherwise.
- + **We recognize that unauthorized sharing of confidential information** can harm Astellas' reputation, violate laws or contracts, and impact the patients relying on our products.
- + **We are responsible for protecting confidential information** and sharing it only with those who need it to perform their job functions effectively.
- + **We ensure compliance with legal** and contractual obligations regarding confidentiality and exercise caution to avoid accidental disclosures of confidential information.
- + **We are cautious to avoid accidental disclosures of confidential information** by not discussing confidential information in public or on social media.
- + **We never disclose confidential information outside the company** without valid business reasons, prior authorization, and, when necessary, a confidentiality agreement – unless required by law.

What is confidential information?

Confidential information is not public and includes data that could benefit competitors or harm Astellas or its business partners if disclosed. It also encompasses information essential for the company's continued successful operation. (e.g. research projects, product launch dates, budget reports).



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We safeguard personal information

Personal information is any data that can identify an individual, whether alone or in combination with other information.

This includes data about patients, clinical trial subjects, healthcare professionals, shareholders, business contacts, and our fellow employees (including email addresses!).

- + **We are all accountable to handle personal information** with the utmost care because protecting this data is crucial for maintaining trust with those we serve.
- + **We adhere to all relevant laws, regulations, the Astellas Global Data Privacy Policy, and other relevant policies.** It is not just a legal requirement; it demonstrates our commitment to protecting the dignity and rights of individuals.

We use information systems and devices properly

The security and proper use of our information systems and devices are crucial for Astellas' success and public trust.

- + **We ensure that confidential and/or proprietary information is not sent outside of Astellas** via mechanisms which are not approved by Astellas, or to external user accounts (including personal email accounts or personal shared drives) which are not authorized and/or necessary to fulfill our job duties.
- + **We use Astellas resources efficiently** and securely to prevent theft, loss, or damage, as described in the Global Policy for Acceptable Use of Technology Assets at Astellas.
- + **We use Astellas resources efficiently** and securely to prevent theft, loss, or damage, as described in the Global Policy for Acceptable Use of Technology Assets at Astellas.
- + **We only use Astellas approved software and hardware.** Unauthorized software installations or hardware connections are prohibited, and we must comply with third-party software licenses.
- + **We communicate professionally** when using company emails and communication tools, as messages can be widely shared.
- + **We use company systems for authorized business purposes** only and not for illegal activities or to interfere with our job responsibilities. All information stored on company systems is a company asset and subject to our records management policies. The company may access this information in accordance with local laws and disclose it during litigation or investigations.



Learn More

[Astellas Global Data Privacy Policy](#)
[Global Policy for Acceptable Use of Technology Assets at Astellas](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We do not share non-public information or participate in insider trading activities

While working at Astellas, we may encounter “material” non-public information about Astellas or others. For more information, visit the [Insider Trading Prevention Site](#).

- + **We do not buy or sell any company's securities or encourage others to do so** whenever, and for as long as we have material non-public information about that company, including Astellas.
- + **Violating these rules** can lead to severe civil and criminal penalties for you and Astellas.

What is material information?

“Material” information is anything a reasonable investor would consider important for investment decisions, such as news about mergers, licensing deals, product launches, or clinical trial developments.

We keep records and financial integrity

Our role in record keeping is vital for managing our business and maintaining public trust.

- + **We keep accurate and timely records of all Astellas transactions** and other activities in sufficient detail, reflecting true and clear information. We prohibit the intentional making of false or misleading entries in any Astellas corporate records for any reason.
- + **We ensure each transaction is authorized, executed, and documented**, with reimbursable expenses accurately reported and supported by correct documentation.
- + **We do not alter, destroy, or conceal any related documents or records**, whether paper, electronic, video or audio. As a general rule, we require that all Astellas records be maintained and destroyed following applicable records and information management policies and procedures.

- + **We do not engage in** theft, embezzlement, extortion, or misappropriation of corporate assets.
- + **We do not engage in** money laundering, tax evasion, accounting fraud, or other financial crimes.
- + **We manage company records throughout their lifecycle**, ensuring compliance with legal requirements. We maintain and dispose of all company records, both physical and electronic, according to these policies.



Learn More

[Global Policy for Insider Trading Prevention](#)

[Global Anti-Fraud Policy](#)

1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

8. We innovate responsibly

We use artificial intelligence ethically

We are committed to adopting modern technologies and processes to remain competitive in today's rapidly evolving digital landscape. Ethically leveraging artificial intelligence (AI) transforms our business by automating operations, extracting valuable insights, and enhancing efficiencies.

These principles guide our development, deployment, and use of AI systems, and we expect our suppliers to uphold the same standards:

- + **We establish clear lines of accountability** for the development and use of AI systems, ensuring that individuals are responsible for their outcomes.
- + **We ensure that our AI systems are transparent** in their operations and decision-making processes, providing clear information about how they function and the data they use.
- + We ensure that our AI technologies will **promote fairness and inclusivity**.
- + **We prioritize the protection and privacy of personal data** in all AI initiatives, adhering to relevant data protection regulations and best practices.
- + **We comply with all applicable laws** and regulations for the development, deployment, and use of AI systems.
- + **We implement robust security measures** to protect AI systems from unauthorized access and ensure their safe operation.

- + **We design AI to be centered on enhancing human wellbeing**, supporting rather than replacing human decision-making, and maintaining human oversight.
- + **We equip AI users with the knowledge and skills** necessary to understand, engage with, and critically assess AI technologies.
- + **We regularly review and update AI practices** to reflect advancements in technology, regulatory changes, and evolving ethical standards.



Learn More

[Ethics of Data, Artificial Intelligence, & Technology Knowledge Hub](#)



1. We do what is right	2. We support and respect each other	3. We improve lives	4. We conduct business the right way	5. We build strong business partnerships	6. We are truthful and compliant	7. We process data and information responsibly	8. We innovate responsibly
---------------------------	---	------------------------	---	---	-------------------------------------	---	-------------------------------

We use data responsibly and ethically

Data ethics is about making sure we handle data fairly, ethically and morally to protect the rights of patients and stakeholders. It emphasizes the importance of *doing the right thing* and maintaining trust and integrity in data collection, processing, and usage.

The following Astellas Data Ethics Principles apply to our everyday work:

- + **We use data responsibly**, placing a priority on upholding individual rights, safeguarding data protection, and regulatory compliance.
- + **We adhere to applicable industry data quality standards**, to ensure all data is fit for purpose, accurate and reliable when making data-driven decisions.
- + **We share data responsibly and securely**, ensuring data sharing (internal and external) is strictly limited to those who require access to fulfil their role.
- + **We utilize datasets in a way that respects individuals' privacy, protects their rights, and honors confidentiality**. We prioritize the safety and privacy of individuals, including patients, employees, and healthcare professionals.
- + **We maintain open communication with all stakeholders**, providing clear and understandable information regarding our data practices and ethical considerations.
- + **We strive to utilize inclusive and equitable data acquisition and application practices**, minimizing the risks of bias, discrimination, or other distortion within datasets.
- + **We protect Astellas proprietary data** with utmost confidentiality and use it only for legitimate business purposes.
- + **We retain data for the minimum necessary period** to fulfil legitimate purposes, ensuring appropriate levels of control and security.
- + **We foster a culture of data ethics awareness** and encourage open discussion on ethical challenges in the use of data.
- + **We incorporate Astellas Data Ethics Principles** into our daily business operations and data related activities.



An employee received an invoice from a vendor containing patient data related to a patient program. They reported it to their local E&C Business Partner, who had already identified the same issue through monitoring. This allowed the matter to be promptly addressed.



Learn More

[Global Policy for Confidential Information](#)

[Astellas Global Data Privacy Policy](#)

[Global Policy for Acceptable Use of Technology Assets at Astellas](#)

[Information Technology Security Policy](#)

