

## Position on Tax

### Background

Astellas has a substantial business and employment presence in many countries around the globe and pays various taxes, including corporate income taxes and other business taxes, as well as taxes associated with its employees. At the same time, Astellas has a responsibility to its shareholders to appropriately manage its taxes to enhance its enterprise value on a sustainable basis, while complying with relevant tax codes.

We are dedicated to contributing toward improving the health of people around the world through the provision of innovative and reliable pharmaceutical products and operate our business in various countries and jurisdictions. We will always manage our business with the highest sense of ethics. We will appropriately fulfill our tax obligations in each territory of operation.

The approach to managing taxes is aligned to the Astellas Group Code of Conduct<sup>\*1</sup>, which sets out what is expected of all officers and employees of Astellas. To meet these commitments, Astellas takes the following approach to tax in all of the territories where it operates.

### Our Position

#### I. Tax Governance

We have robust internal policies and procedures to ensure that there is alignment across our business and we meet our tax obligations. In addition, we identify, assess and manage tax risks within the framework of these policies and procedures and account for them appropriately.

Our global tax policy and transfer pricing policy are approved by the Chief Executive Officer and are implemented across the Astellas Group.

The Global Tax Head is responsible for ensuring that our policies establish appropriate procedures, which are maintained and applied consistently around the world, and that the global tax team has the skills and the experience to follow the procedures and perform their duties in accordance with them.

#### II. Tax Compliance

We have a tax code of conduct, in which we commit to complying with the local tax laws and regulations in each country where we operate. We aim to be a good corporate citizen by observing

applicable laws and regulations, including the intent of such rules, and strive to pay the right amount of tax in the right place at the right time.

### **III. Transfer Pricing**

To determine the pricing of transactions among entities within the Astellas Group, we apply OECD guidelines and country-specific rules, which include the appropriate application of relevant transfer pricing methods based on the analysis of the functions performed and risks assumed as well as appropriate documentation.

In addition, we enter into bilateral Advance Pricing Agreements (APA) with tax authorities where appropriate. The APAs provide long-term certainty for both the tax authorities and Astellas.

### **IV. Intangibles**

Our intangibles are important to Astellas. The key elements to the creation of intangibles are basic research and development activities. An entity that performs value-added activities, including R&D, and bears risks related to those activities is defined as the owner of intangibles within Astellas. Contributions to profits by those entities are considered to be substantial. Meanwhile, the rest of entities generally do not contribute to creation of intangibles, and contribution to profits by such entities is considered as relatively limited. Allocation of profits to such entities is made in proportion to the value of their respective contributions to profit generated from the transactions.

### **V. Relationship with Tax Authorities**

We seek to build and sustain relationships with governments and tax authorities that are constructive and based on mutual respect. We work collaboratively wherever possible with tax authorities to resolve disputes and to achieve early agreement and certainty.

### **VI. Attitude to Arranging Tax Affairs**

In structuring our commercial activities, we consider the tax rules of the countries where we operate with a view to achieving sustainable growth. For example, we often look to take steps to appropriately reduce the risk of double taxation (i.e. the same income taxed twice in two different jurisdictions). Any structuring that is undertaken will have a business purpose or commercial rationale, and we will not engage in any structuring that uses low-tax jurisdictions so-called 'tax havens' or transfers profits to low-tax jurisdictions for the purpose of tax avoidance.

Furthermore, we support the objectives of the OECD's BEPS<sup>2</sup> project to address tax avoidance.

## **VII. Statutory disclosure requirements**

- (1) This statement is intended to satisfy any statutory disclosure obligation that may exist in the territories where the Astellas Group operates, which includes but is not limited to satisfaction of the requirements under paragraph 16(2) of Schedule 19 to Finance Act 2016 in the UK by Astellas Pharma Inc. and its UK subsidiaries in respect of financial year ended 31 March 2025.
  
- (2) Please refer to Reference No.3 below for our tax paid by region, which includes satisfaction of the EU disclosure requirements. The data is based on our Country-by-Country Reporting and may differ from the consolidated financial statements.

## **References**

1. Astellas Group Code of Conduct  
<https://www.astellas.com/en/about/charter-of-corporate-conduct-group-code-of-conduct>
  
2. BEPS (Base Erosion and Profit Shifting)  
<https://www.oecd.org/tax/beps/>
  
3. Our tax data (Summary)  
<https://www.astellas.com/en/about/our-tax-data>