

Policy on Global Anti-Bribery and Anti-Corruption

Background

Astellas is committed to conducting its business throughout the world with integrity, the highest ethical standards, and in compliance with applicable anti-bribery/anti-corruption (“ABAC”) laws, rules, regulations, codes and guidelines.

What constitutes bribery may vary from country to country. Many ABAC laws apply beyond the territorial boundaries of the country where they were created. Some ABAC laws prohibit bribery not only of government officials but also apply to non-government employees.

Astellas ensures that a consistently high and ethical standard is applied to interactions with government officials, government organizations, health care professionals and health care institutions across the globe.

Policy

Astellas prohibits bribery or other corrupt activity, either directly or through the engagement of third parties, in all of its interactions with government officials, government organizations, health care professionals and health care institutions. Astellas requires all of its employees and third party representatives to maintain appropriate relationships with government officials, government organizations, health care professionals and health care institutions in a manner that ensures free and fair competition in all aspects of the conduct of our business.

As part of their interactions with government officials, government organizations, health care professionals and health care institutions, Astellas prohibits all employees, either directly or indirectly, from:

- offering, promising, giving or authorizing, soliciting or accepting bribes which may include money, hospitality or anything else of value;
- providing any financial or other advantage; or
- ignoring or countenancing the activities of any Astellas employees or agents who offer, promise, give, authorize, solicit or accept any bribe in relation to Astellas’ business;

when the purpose of doing so is to:

- obtain or retain business for Astellas;
- influence any act or decision in connection with Astellas business activities;
- obtain an improper advantage;
- violate a duty of loyalty; or
- reward improper conduct.