

Global Policy for Records and Information Management

Background

Proper record keeping is important to the successful management of our business and to maintaining public confidence in Astellas. According to Astellas Group Code of Conduct, the Global Policy for Records and Information Management (the “Policy”) is designed to further enhance the company’s ability to meet its business needs and comply with applicable legal and regulatory requirements through the systematic control of our business records throughout their lifecycle (from creation through disposition). As a general rule, all Company records (physical and electronic) are required to be maintained and destroyed in accordance with the Policy.

Policy

“Records” are recorded information in any media, format or location, received or created by Astellas, which is evidence of or supports its business operations, and has informational value requiring retention for a specific period of time in accordance with the Records Retention Schedule. A Retention Schedule specifies an organization’s record retention policy at the “record class” level and associates legal and regulatory requirements with these record classes.

Astellas’ Records and Information Management processes and procedures shall be globally aligned.

Astellas’ Records shall be managed in a manner that meets Astellas’ business needs as well as applicable legal, contractual and regulatory obligations.

Astellas’ Records shall be protected and maintained in such a way as to remain trustworthy and accessible throughout their lifecycle.

Astellas personnel shall incorporate the management of Records and Information into their business operations.

Any Record or Information created or received in the course of Astellas business is the property of Astellas and does not belong to any one individual, function, business unit, affiliate and/or department.

Records and Information shall be appropriately destroyed in the normal course of business when the retention and preservation requirements have been met in accordance with the Policy.