Policy on Advisory Engagements

Background

Astellas may engage healthcare professionals (HCPs) and other external advisors in order to obtain outside expert advice, opinions and feedback on the development and commercialization of Astellas products and compounds or other appropriate business needs.

Astellas is committed to conducting its business throughout the world in accordance with applicable laws, rules, regulations, codes, guidelines and in accordance with high ethical standards. The purpose of this policy is to establish the governing principles when conducting advisory engagement activities.

Policy

Whenever Astellas hires an HCP for advisory engagements including advisory boards, scientific expert meetings, roundtable meetings, or other consulting arrangements to provide services for the Company, we require the following conditions be met:

• There is a legitimate business need for the services on the part of Astellas;
• The arrangement is not a disguised way of inducing the HCP to prescribe, purchase, or recommend Astellas products or as a way of rewarding him/her for doing so;
• The HCP is selected based on his/her qualifications, expertise, capabilities, experiences and/or other appropriate criteria directly related to the identified need;
• A written contract is in place prior to the commencement of the services that accurately describes the nature of the services and the basis for remuneration;
• All compensation reflects fair market value for the services provided;
• Any meeting or event we organize or sponsor for the HCP to perform services is held at an appropriate venue that is conducive to the purpose of the meeting or event; and
• Any travel, lodging, and meals we provide to the HCP in relation to his/her performance of services are consistent with relevant Company policies.