Policy on Respect in the Workplace/ Prevention of Discrimination and Harassment

Background

Astellas is committed to maintaining a work environment that encourages respect for the dignity of each individual, and to providing its employees with a work environment free from unlawful discrimination and harassment. This policy reflects Astellas’ commitment to conducting its business throughout the world in accordance with applicable laws and high ethical standards. Astellas values the contributions of its employees and believes that working together in a respectful environment is key to our continued success. This policy provides a global minimum standard for positive behaviors and defines conduct that is prohibited in the form of discrimination, harassment and bullying.

Policy

Everyone has a responsibility to help maintain a positive and respectful work environment at Astellas and help prevent unethical or unlawful activities/actions. Employees are encouraged to exhibit positive behaviors such as treating everyone fairly, maintaining a workplace where employees can openly communicate, and respecting individual differences.

Astellas prohibits illegal acts of discrimination and harassment based on age, color, disability, employment status, ethnic origin, marital status, nationality, race, sex, sexual orientation, religion or belief, gender identity or expression, veteran status, or any other characteristic protected by applicable law. Astellas also considers bullying and power harassment behaviors as inappropriate, regardless of whether they are illegal in the country of employment. Bullying is offensive, intimidating, malicious or insulting behavior that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power harassment is bullying that additionally involves the misuse of power.

Astellas employees who become aware of, or reasonably believe that there has been a potential or actual violation of this policy, or any other Astellas policy or procedure, or law, regulation or industry association code relating to discrimination and harassment must report the matter to the Company in good faith. Violations of this policy may be subject to potential disciplinary action in accordance with laws and/or regulations in the country of the employee’s employment or assignment.

Astellas prohibits retaliation against anyone who in good faith reports a concern about harassment, discrimination, or other issues, or cooperates with an investigation thereof, even if the concern is ultimately determined to be unfounded.

Disclosed in April 2017