

Astellas Business Partner Code of Conduct



Astellas Pharma Inc.

Purpose

Astellas is committed to sustainability in all business activities and to abiding by the highest ethical, social and environmental standards.

We work with Business Partners who share these commitments and who operate in a socially and environmentally responsible manner.

We believe in a strong relationship with our Business Partners based on a mutual understanding of our core values. This Business Partner Code of Conduct communicates our expectations concerning:

- Ethical Business Practices
- Respect for Human and Labor Rights
- Protection of Worker Health and Safety
- Safeguarding the Environment
- Management Systems and Transparency



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Definitions

- “**Business Partner**” means individuals or organizations that conduct business with Astellas, including those that provide goods or services to – as well as those that purchase goods or services from – Astellas and its subsidiaries, affiliates and divisions.
- “**corruption**” is a form of dishonest, fraudulent, or otherwise unethical or illegal conduct by a person in a position of power or public trust (like a public official), based on improper influence. It is an abuse of power or public trust for private gain.
- “**subject**” means any person who participates as a subject in scientific medical experimentation or product testing.
- “**donor**” means any person who donates tissues, cells, organs and any other body parts for research purposes.

References

- Astellas Group Code of Conduct
- Astellas Group Anti-Bribery/Anti-Corruption



Ethical Business Practices

Business Partners must conduct their business ethically and act with integrity.

Bribery and Corruption

We have zero tolerance for corruption. Business Partners may not engage in any form of bribery or corruption. Business Partners may not pay or accept bribes or participate in other illegal conduct in business or government relationships. Business Partners may not use intermediaries to engage in behavior they are prohibited from engaging in themselves. Business Partners must ensure they have adequate systems in place to prevent bribery and corruption and comply with all applicable foreign and domestic anti-corruption laws.

Fraud, Financial Crimes & Tax Evasion

All acts of financial fraud, financial crimes and tax evasion, including theft, embezzlement, money laundering, forgery, tax evasion, facilitation of tax evasion by others, accounting fraud and any other financial fraud, financial crime, and tax evasion crime are prohibited.

Trade Compliance

Business Partners must comply with all applicable international trade compliance laws (such as customs, export controls and sanctions) including those imposed by the United Nations, the European Union, the United Kingdom, Japan, the United States or the laws of any other country applicable to where such transactions occur.

Fair Business Practices

Business Partners must conduct their business consistent with fair and vigorous competition and in compliance with all applicable fair competition and antitrust laws and regulations. Business Partners must employ fair business practices including accurate and truthful advertising.

Supplier Diversity

Business Partners are to identify and provide opportunities to small and diverse businesses in connection with supplying useful goods and services to Astellas at competitive prices.

Ethical Marketing & Promotional Practices

All marketing and promotional materials and activities must conform to high ethical, medical and scientific standards, and comply with all applicable laws and regulations.

When engaged with health care professionals or patients, all Business Partners must adhere to relevant industry standards of conduct that apply to them.

Patient Safety and Access to Information

Business Partners shall ensure that adequate management systems are in place to minimize the risk of adversely impacting on the rights of patients, subjects and donors, including their rights to health and to access information directly.

Animal Welfare

Animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

Conflicts of Interest

Business Partners may not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, and obligations to Astellas. We expect our Business Partners to immediately notify us if any conflicts of interest arise.

Intellectual Property

Business Partners must respect Astellas' intellectual property rights. Business Partners are required to take all reasonable efforts to safeguard their knowledge and protect Astellas' intellectual property rights.

Data Privacy and Data Security

While doing business with Astellas, Business Partners may process the personal information of various individuals. In doing so, they are expected to fully comply with all applicable privacy laws and with their contracts with Astellas.

Business Partners shall take appropriate measures and implement effective controls to adequately protect personal information from known or anticipated risks and keep it secure, confidential and authentic.

In case of an incident that could have an adverse impact on personal information, Business Partners must immediately inform Astellas and assist Astellas in any

investigation to assess and remediate such incidents effectively.

If there is a business need to transfer personal information of individuals on behalf of Astellas to a third country, Business Partners will comply with any specific rules on cross border transfers and, when requested by Astellas, will collaborate with Astellas to achieve an adequate level of protection before any transfer takes place.



Human and Labor Rights

Business Partners shall be committed to upholding the human and employment rights of workers and to treating them with dignity and respect.

Freely Chosen Employment

Business Partners shall not use forced, bonded or indentured labor or involuntary prison labor. No worker shall pay for a job or be denied freedom of movement.

Child Labor and Young Workers

Business Partners must not use child labor. The employment of workers under the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-Discrimination

Business Partners shall provide a workplace free from unlawful discrimination. There shall be no discrimination for reasons such as race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, gender identity / expression, political affiliation, union membership, marital status, or other characteristics protected by applicable law.

Insider Trading

Business Partners cannot purchase, sell, or trade Astellas' securities if they are aware of non-public material information about Astellas. Non-public information is information which is not available to the general public and which could influence an investor to buy, sell, or hold securities.

Fair Treatment and Anti-Harassment

Business Partners shall provide a workplace free of harsh and inhumane treatment, including sexual or other abuse/harassment, corporal punishment, mental or physical coercion, verbal abuse, and related forms of intimidation, including threats of any such treatment.

Wages, Benefits, and Working Hours

Business Partners must pay workers according to applicable wage and hour laws, including minimum wages, overtime hours and mandated benefits. Business Partners must, in a timely manner, communicate with workers the basis on which they are being compensated. Business Partners are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

Freedom of Association

Business Partners must respect the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed. Business partners must respect the rights of workers to communicate openly with management or with each other regarding working conditions without fear of retaliation, harassment, intimidation, penalty or interference.



Health and Safety

Business Partners shall provide a safe and healthy working environment, including - where applicable - for any company-provided living quarters. Health and Safety measures shall extend to contractors and subcontractors on supplier sites.

Worker Protection and Safety

In both the workplace and any company-provided living quarters, Business Partners must protect workers from exposure to chemical, biological, physical hazards, and physically demanding tasks. Business Partners must operate in compliance with all applicable health and safety regulations and ensure safety management systems are in place to prevent work-related injuries.

Process Safety

Business Partners must prevent or mitigate incidents associated with operations and processes that could result in catastrophic impact to people or the environment, on and off site. Business Partners' actions must be commensurate with the risks associated with the potential impact.

Emergency Preparedness and Response

Business Partners must identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact by implementing emergency plans and response procedures. Business Partners must review and, if appropriate, update such plans and procedures annually or, more frequently, if necessary.

Hazard Information

Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - shall be available to educate, train, and protect workers from hazards.



Environment

Business Partners shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Business Partners are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle.

Energy Conservation and Climate Change

Business Partners shall monitor their energy consumption volume and promote energy conservation initiatives. Business Partners shall maintain energy reduction goals and make an effort to reduce their environmental impact, such as greenhouse gas emissions, from their operations.

Environmental Authorization

Business Partners must comply with all applicable environmental regulations, laws, codes, and other governmental requirements and authorizations. Business Partners must obtain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations and restrictions.

Waste, Emissions, and Spills

Business Partners shall have systems in place to ensure the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment (PiE).

Business Partners shall have systems in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.

Resources

Business Partners shall take measures to improve efficiency and reduce the consumption of resources.



Management Systems and Transparency

Business Partners must use management systems to maintain business continuity, facilitate continual improvement and compliance with the expectations of these principles.

Commitment and Accountability

Business Partners must demonstrate commitment to the principles set forth in this Code by allocating appropriate resources and identifying senior responsible personnel.

Legal and Customer Requirements

Business Partners must comply with all applicable laws, regulations, standards and relevant customer requirements.

Risk Management

Business Partners must have mechanisms to identify, assess, and mitigate risks in all areas addressed by this Code.

Accounting and Recordkeeping

We are committed to the integrity of our business records and ensuring that our books, records, and financial reporting are accurate and complete. Business Partners must maintain up-to-date business and financial records in compliance with all applicable laws and regulations and Astellas requirements. These records must be made available upon our request.

Payment Systems and Processing

Business Partners must have systems and processes in place to assure any payments they make or receive are legitimate, and appropriately documented.

Training and Competency

Business Partners must have a training program that addresses the expectations

of this Code.

Continual Improvement

Business Partners are expected to continually review and improve their compliance program.

Identification of Concerns

All workers must be encouraged to report concerns, illegal activities or breaches of the principles set forth in this Code in the workplace. Business Partners must not allow retaliation against employees who report a concern in good faith. Business Partners must investigate reports and take corrective action if needed.

Communication

Business Partners must have effective systems to communicate the principles of this Code to workers, contractors and suppliers.

Business Continuity

Business Partners must develop and implement appropriate business continuity plans for all operations supporting Astellas' business.

Third Party Selection and Monitoring

Business Partners must apply the principles outlined in this Code when selecting their own partners and suppliers. Business Partners must have or put in place systems to monitor their supplier and subcontractor compliance.



Speak Up!

We all have a duty to speak up to protect others! If you have a concern that the principles set forth in this Code are not being followed, or you are aware of a situation that might create a risk to health, safety, patients, workers or the environment by an Astellas Business Partner, you can submit a report to Astellas at any time through EthicsPoint:

www.astellas.ethicspoint.com

Astellas will not tolerate retaliation against anyone for reporting concerns in good faith.

