

Eisai Global Code of Conduct for Business Partners

In order to realize our corporate philosophy, Eisai developed a Charter of Business Conduct and a Code of Conduct to guide our employees in their business dealings in compliance with all relevant laws and ethical standards, and to support sustainable economic growth and provide solutions to social issues. Similarly, Eisai also established a set of standards for the behavior we expect from our Business Partners.

The Eisai Global Code of Conduct for Business Partners (“Code”) applies to all Business Partners and their employees, including contractors, agents, suppliers, vendors and all other local and foreign entities acting on their behalf worldwide (“Business Partners”).

Eisai is a signatory to the United Nations Global Compact (“UNGC”) that outlines principles that support human rights, labor, and the environment, and oppose modern slavery and corruption. Eisai is also a member of the Pharmaceutical Supply Chain Initiative (“PSCI”), a non-profit organization comprised of global pharmaceutical companies, and supports its principles for responsible supply chain management (PSCI Principles). This Code is based on the PSCI Principles that sets forth the standards we expect our Business Partners to follow with respect to legal compliance, ethics, human rights, health and safety, the environment, and related management systems.

Eisai expects its Business Partners to meet the requirements set forth in this Code. In addition, Eisai expects its Business Partners to cooperate in evaluating, auditing, and addressing any issues related to the matters described in this Code. We hope that this Code will become more practical through continuous improvement, and lead to mutual increased corporate value of our Business Partners.

1. Legal Compliance

Business Partners shall identify and comply with all applicable laws, regulations, and standards.

2. Management Systems

Business Partners shall establish management systems to maintain business continuity, facilitate continual improvement and compliance with the expectations of this Code regarding legal compliance, ethics, human rights, health and safety, and the environment.

2.1. Culture, Commitment, and Accountability

Business Partners shall demonstrate commitment to the concepts described in this Code by allocating appropriate resources and identifying senior responsible personnel, thereby creating a culture of responsible practices and governance.

2.2. Risk Management

Business Partners shall have mechanisms to continuously determine and manage risks in all areas addressed by the Code.

2.3. Sustainable Sourcing and Traceability

Business Partners shall establish systems to carry out due diligence regularly on their own supply chain to promote legal and sustainable sourcing.

2.4. Training and Competency

Business Partners shall devise and implement training programs to ensure that management and workers achieve an appropriate level of knowledge, skills, and competence to be able to meet the expectations in this Code.

2.5. Documentation

Business Partners shall maintain documentation necessary to demonstrate conformance with the Code and compliance with applicable regulations.

2.6. Continual Improvement

Business Partners are expected to continually improve by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

2.7. Emergency Preparedness and Response

Business Partners shall have effective emergency plans and response procedures.

2.8. Identification of Concerns (Grievance Mechanisms)

Business Partners shall strive to establish grievance mechanisms whereby internal and external stakeholders can report concerns, illegal activities or breaches of the Code in the workplace without threat of or actual reprisal, intimidation or harassment.

2.9. Response and Remediation

Business Partners shall properly investigate and respond to incidents or concerns relating to the Code, taking necessary corrective actions, and provide remediation where required.

2.10. Effective Communication

Business Partners shall have effective systems to communicate the Code to relevant stakeholders including their workers, contractors, and suppliers.

3. Ethics

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

3.1. Patient Safety and Access to Information

Business Partners shall have adequate management processes in place to minimize the risk of adversely impacting the rights of patients, including their rights to health and to access their information directly.

3.2. Anti-Bribery and Corruption

All forms of bribery, corruption, extortion and embezzlement, including facilitation payments, are prohibited. Business Partners shall not pay or accept bribes or participate in any form of corrupt inducements in business or government relationships, or through the use of intermediaries to secure an unfair advantage. Business Partners shall ensure they have adequate policies and systems in place in order to prevent bribery and comply with applicable laws.

3.3. Fair Competition

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

3.4. Animal Welfare

If Business Partners use animals in their business activities, such animals shall be treated humanely with pain and stress minimized. Animal testing should only be performed after consideration of alternative methods to replace animals, reduce the number of animals used, or refine procedures to minimize distress. Alternative methods should be used when scientifically valid and acceptable to regulators.

3.5. Data Privacy and Security

Business Partners shall comply with applicable privacy and data protection laws and ensure the protection, security and lawful use of personal data.

3.6. Avoidance and Management of Conflicts of Interest

Business Partners shall take reasonable care to identify, avoid and manage conflicts of interest. Business Partners are expected to notify Eisai and other affected parties of any significant or potential conflicts of interest.

3.7. Product Protection and Quality

Business Partners shall ensure that management and security systems are in place to protect products, components, and ingredients from the risks of adulteration, falsification, or theft for the purpose of unauthorized resale.

4. Human Rights

Business Partners shall respect the human rights of internal and external stakeholders ensuring to treat them with dignity and respect.

4.1. Freely Chosen Employment

Business Partners shall not use forced, bonded or indentured labor, involuntary prison labor, or take part in human trafficking or any form of modern slavery. No worker shall pay for a job or be denied freedom of movement.

4.2. Child Labor and Young Workers

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

4.3. Non-Discrimination

Business Partners shall strive for equality, providing a work environment free from discrimination for reasons such as race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.

4.4. Fair Treatment

Business Partners shall provide a work environment free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and there shall be no threat of any such treatment.

4.5. Wages, Benefits and Working Hours

Business Partners shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Business Partners shall communicate to their workers in a timely manner the basis of their compensation. Business Partners are also expected to communicate with their workers whether overtime is required and the wages to be paid for such overtime. Overtime shall be consistent with applicable national and international standards.

4.6. Freedom of Association and Right to Collective Bargaining

Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged. Business Partners shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils, as well as to bargain collectively. Where the right to freedom of association and collective bargaining is restricted by law, the employer (i.e., the Business Partner) facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining. Workers shall be able to communicate openly with management regarding working conditions without fear of retaliation.

4.7. Local Communities

Business Partners shall respect the rights of the local communities around their sites including the right to a clean and healthy environment.

5. Health and Safety

Business Partners shall provide a safe and healthy working environment and support the wellbeing of workers. Health and Safety measures shall extend to contractors and subcontractors on Business Partners' sites.

5.1. Safety of the Work Environment

Business Partners shall put in place adequate risk assessments and emergency plans to ensure the safety of the work environment. Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be available and used to educate, train, and protect workers from hazards. Business Partners shall demonstrate good housekeeping practice and a culture of safety.

5.2. Worker Protection, Health, and Wellbeing

Business Partners shall protect workers from over exposure to chemical, biological, and physical hazards. Appropriate personal protective equipment, facilities, and services shall be provided to support worker safety, health and wellbeing.

5.3. Process Safety

Business Partners shall have management processes in place to identify the risks from chemical and biological processes and to prevent the catastrophic release of chemical or biological agents into the environment.

6. Environment

Business Partners shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment, and to help their own Business Partners do the same. Business Partners are encouraged to conserve natural resources, reduce Green House Gas (GHG) emissions, preserve biodiversity and clean water, and minimize and control the use of hazardous materials.

6.1. Environmental Authorizations and Reporting

Business Partners shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions must be obtained, and their operational and reporting requirements followed.

6.2. Management of Waste and Emissions

Business Partners shall have processes or 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 must be appropriately managed, controlled, and treated prior to release into the environment. This includes managing releases of active Pharmaceuticals into the Environment.

6.3. Climate Change

Business Partners shall monitor and reduce their GHG emissions and support their business partners to do the same.

6.4. Resource Efficiency

Business Partners shall strive for circularity, designing out waste, taking measures to improve efficiency and reduce the consumption of resources, including water, favoring renewable and sustainable sources. They shall also take measures to reuse and recycle.

6.5. Biodiversity Conservation

Business Partners shall understand their impacts on biodiversity, reducing and mitigating their footprint wherever possible.

6.6. Spills and Releases Prevention

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.

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