



# Takeda Human Rights and Modern Slavery Statement

Financial Year 2024

## Introduction

This statement has been prepared pursuant to the UK Modern Slavery Act (2015), Australia Modern Slavery Act (2018) (Cth), Norway Transparency Act (2022), Switzerland Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (2022) and Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023). This statement covers the reporting period from April 01, 2024, to March 31, 2025 (Financial Year 2024, “FY24”).

### Reporting entities

This consolidated statement is made on behalf of:

- Takeda UK Limited (“Takeda UK”) and Takeda International – UK Branch, a branch of the Swiss entity Takeda Pharmaceuticals International AG for the purposes of reporting under the UK Modern Slavery Act (2015)
- Takeda Australia Pty Ltd (“Takeda Australia”)
- Takeda Canada Inc. (“Takeda Canada”)
- Takeda AS (“Takeda Norway”),
- The relevant entities in Switzerland for the purposes of the Swiss Ordinance are Takeda Pharmaceuticals International AG (“TPIZ”), Takeda Pharma AG (“Takeda Pharma AG”) and Baxalta Manufacturing Sàrl (“Neuchâtel Site”).

### Scope and definitions

This statement sets out the steps taken to implement and strengthen our due diligence processes, and to identify and address actual and potential human rights impacts which encompasses risks of infringement to internationally recognized human rights<sup>1</sup>. This includes potential human rights violations related to decent working conditions<sup>2</sup>, forced labor<sup>3</sup>, human trafficking<sup>4</sup>, child labor<sup>5</sup> within our operations and supply chains. References to “human rights” in this statement cover all aforementioned risks. Furthermore, the work completed and in progress enterprise-wide on human rights is applicable to all reporting entities.

### Exception

Takeda’s assessment conducted for FY24 established that the relevant entities in Switzerland fall below the quantitative thresholds stipulated by the Swiss Code of Obligations Art. 964j-I. Takeda is exempt from the Swiss due diligence and reporting obligations on minerals and metals from conflict affected areas for FY24.

## Our business, operations and supply chains

Headquartered in Japan, Takeda Pharmaceutical Company Limited is a global, values-based, R&D-driven biopharmaceutical company committed to bringing Better Health and a Brighter Future to patients by translating science into highly innovative medicines. Unless expressly stated otherwise, references to “Takeda”, “we” or “our” refer to the Takeda Group including subsidiaries

<sup>1</sup> Additional information provided in section titled “Takeda’s Human Rights Commitment”.

<sup>2</sup> Section 3 of the Norway Transparency Act defines “decent working conditions” as “work that safeguards fundamental human rights pursuant to (b) and health, safety and environment in the workplace, and that provides a living wage”.

<sup>3</sup> According to the ILO Forced Labor Convention (1930, No. 29) “forced or compulsory labour shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.

<sup>4</sup> According to the Palermo Protocol (2000) Human Trafficking is defined as “the recruitment, transportation, transfer, harboring or receipt of an individual by means of threat or use of force or other forms of coercion for the purpose of exploitation”.

<sup>5</sup> Child labor means labor or services provided or offered to be provided by persons under the age of 18 years as defined under the ILO Minimum Age Convention, 1973 (No. 138) and ILO Worst Forms of Child Labor Convention, 1999 (No. 182).

and affiliates. We focus on innovations that contribute to making a difference in people's lives. We aim to discover and deliver life-transforming treatments in our core therapeutic and business areas, including gastrointestinal and inflammation, rare diseases, plasma-derived therapies, oncology, neuroscience and vaccines.

We engage with suppliers globally and recognize that it is our responsibility to address potential human rights risks within our supply chains and strive to respect human rights in our business activities. More information is available in our [Annual Integrated Report](#).

## Governance and policy framework

### Governance for human rights

Takeda's Global Risk, Ethics & Compliance Committee holds accountability for Takeda's Human Rights Commitment. A dedicated Human Rights team within the Ethics and Compliance function is responsible for operationalizing Takeda's Human Rights Commitment, collaborating closely with functional experts to embed human rights due diligence in prioritized areas across our operations.

### Corporate Philosophy

Takeda-ism has always been our unique compass. Its timeless values of Integrity, Fairness, Honesty and Perseverance define who we are. They are brought to life through decisions and actions that put patients at the center of everything we do, build trust with society, reinforce our reputation, and develop a sustainable business, in that order. Together, Takeda-ism and principles organized around *Patient-Trust-Reputation-Business* ("PTRB") in that order underpin everything we do and how we do it.

### Takeda's Human Rights Commitment

Takeda exists to create better health for people, and a brighter future for the world. Our Human

Rights Commitment is guided by our values of Takeda-ism, reinforced within our Global Code of Conduct.

As a signatory of the United Nations Global Compact, Takeda is committed to respecting internationally recognised human rights within every aspect of our business, across our value chain and within the communities we serve. Our Commitment is to do so in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct. Our Commitment covers all internationally recognised human rights included in the International Bill of Human Rights<sup>6</sup>. We are continually aiming to enhance our processes to work toward fulfilling this Commitment. More information is available on Takeda's [corporate website](#).

### Policy framework

#### *Takeda Global Code of Conduct*

Our [Global Code of Conduct](#) affirms Takeda's Commitment to providing a safe and healthy working environment, free from harassment and discrimination, and to conduct our business with integrity and speak up for our values. Bringing the Global Code of Conduct to life makes sure that we are "*Living Our Values Every Day*". All Takeda entities are committed to operating in line with our Global Code of Conduct, which calls for the highest standards of ethical behaviour.

Our Human Rights Commitment is further embedded in our Global Code of Conduct, in which we state that "*We respect and protect human rights – within our business, across our supply chain and in the communities where we operate, paying particular attention to vulnerable populations*".

#### *Takeda Supplier Code of Conduct*

In FY24, we launched an updated [Supplier Code of Conduct](#). The Supplier Code outlines our expectations of fair treatment and freedom of

<sup>6</sup> Universal Declaration of Human Rights (UDHR), the International Covenants on Civil and Political Rights (ICCPR) and Economic, Social and Cultural Rights (ICESCR), as well as the

International Labor Organization (ILO) Core Labor Conventions including the Minimum Age Convention (no.138) and the Worst Forms of Child Labour Convention (no. 182)

association including compliance with applicable laws, such as child labor, discrimination, rights to association, human trafficking and freely chosen employment. It also includes instructions for suppliers to contact the Takeda Ethics Line to report any concerns, including for human rights.

The code prohibits direct third parties from using child labor and states that *“Suppliers shall not use child labor. The employment of young workers below 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”*.

#### *Anti-corruption and human rights synergies*

We also recognize that corruption may lead to potential negative impacts on human rights. We strictly prohibit all forms of such conduct as detailed in our [Global Anti-Corruption Policy](#).

## Due diligence and risk assessment

We have due diligence processes and management systems in place to identify and address potential and actual human rights impacts. We recognize that human rights due diligence is a process of continuous improvement, and we review and refine our approach on an ongoing basis.

### Global Human Rights Impact Assessment

In 2024 Takeda updated its global human rights impact assessment, relevant for the reporting entities involving internal and external stakeholders. We assessed each of the potential impacts identified throughout Takeda’s value chain and operations, using the UNGPs methodology embedding the following criteria:

- **Impact on internal and external** human rights as per the UNGPs.
- **Level of priority** based on the severity of the impact on people.
- **Likelihood** based on Takeda’s enterprise risk assessment likelihood scale.

In applying these factors, we made appropriate adjustments for attribution (proximity of Takeda to

the impact), leverage (Takeda’s influence over the impact) and the strength of our current management practices. Through the completion of the assessment, we have identified four prioritized human rights impacts:

- **Health:** Promoting and protecting the health of patients and donors, participants in clinical trials, communities, and other groups we interact with.
- **Safe, healthy, just and favorable conditions of work:** Promoting adequate working conditions and occupational health and safety for employees within Takeda operations and workers within our value chain.
- **Freedom from discrimination:** Promoting fair, non-discriminatory and inclusive practices within Takeda and our value chain.
- **Clean, healthy and sustainable environment:** Promoting environmental sustainability across our operations, value chain and communities we serve.

### Enterprise Risk Management

Takeda has established an integrated system that brings together the three areas of enterprise risk management, business continuity management, and crisis management based on the *“Global Business Resilience Policy.”*

Takeda conducts an annual enterprise risk assessment for the identification, evaluation, and mitigation planning for prioritized risks. Takeda develops business continuity plans for major risks and essential business areas. Takeda formulates crisis management plans to identify, manage and recover from a crisis and responds to it by organizing a Crisis Management Committee according to the level of impact.

Takeda has established the principles and processes to identify, monitor and report selected high-risk business activities based on the *“Global Monitoring Policy”*. Each relevant functional area within the business, including human rights, is responsible for managing its key risks and responses to them.

### Third Party Risk Management (TPRM)

Takeda works with various external partners worldwide and our approach to identifying and managing human rights risks in our supply chain is conducted through our TPRM Program.

By considering geography and procurement category risks, we identify specific areas that may present the highest human rights risk in our supply chain. Our country risk matrix includes specific indices on child labor such as the UNICEF Child Rights Index. Third parties presenting potential human rights risks must undergo negative media screening and are required to complete a third-party questionnaire. Where relevant, they may be required to complete Corrective and Preventative Action Plans (CAPAs).

Third parties as part of the onboarding process must acknowledge Takeda's Supplier Code of Conduct, which requires suppliers to comply with laws governing human rights. Based on the associated contractual requirements, cases of non-compliance may lead to the termination of our relationship with partners who are unable to meet our requirements.

### Third Party Audits

As per previous years, we continued in 2024 to undertake announced and independent third party audits conducted by an external audit firm to evaluate suppliers against the expectations laid out within our Supplier Code of Conduct, including human rights and labor standards, following the Pharmaceutical Supply Chain Initiative (PSCI) Audit Guidance. Non-conformances are assessed as minor, major or critical and we communicate the findings and how we categorize them to each supplier with our expectations for a documented plan of time-bound corrective actions and demonstrated improvement.

Furthermore, we are exploring opportunities to further strengthen our approach to third-party social auditing. This includes embedding human

rights criteria into our existing audit frameworks across Takeda's business and enhancing our methodology for monitoring potential areas of elevated risks, such as for specific commodity or geography. We will report on progress in future reporting.

### Contractual provisions

Takeda's purchase order [Terms and Conditions](#) and contractual clauses for providers of goods and services require our suppliers to certify compliance with all applicable laws and Takeda's Supplier Code of Conduct.

Additionally, Takeda Australia includes in its local template service agreement and template master service agreement a dedicated clause which imposes an obligation on our service providers that they will conduct its business in a manner that is compliant with the Australian Modern Slavery Act.

### Actual and potential human rights risks identified for the reporting entities

Based on our global human rights due diligence efforts and country assessment conducted for the reporting entities in the last financial year, we have not identified actual human rights impacts in FY24. In addition, we have determined an overall low risk of exposure to potential human rights risks both in our operation and supply chains, based on the activities conducted by the reporting entities.

#### Own operations

Most reporting entities covered in the consolidated report, are Local Operating Companies (LOCs)<sup>7</sup> which are commercial entities focused on the marketing and sales of Takeda's products for their local market. The scope of day-to-day activities present overall limited exposure to potential human rights within our own operation.

Neuchâtel Site operates as a biotechnology production site specializing in the manufacture of drugs to treat hemophilia. Hemophilia is a rare hereditary disease that results in various types of blood coagulation disorders or deficiencies. The

<sup>7</sup> Apart from Neuchâtel Site for which specific information are provide below, TPIZ which is the regional headquarter for our

operations in Europe and Canada and Takeda International – UK branch which is a branch of TPIZ.

Neuchâtel Site supplies these medicines worldwide. As part of our operations in Neuchâtel, minor apprenticeships are governed by Switzerland Ordinance 5 on the Protection of Young Workers and fall under the scope of Articles 6 and 7 of ILO Convention No. 138.

### *Supply chain*

In FY24, primary business activities including direct suppliers' engagement conducted by the relevant LOCs focused on the marketing and sales of Takeda's products for their local market. These entities distribute products locally through local distributors and wholesalers, using local warehouse facilities as well as transport providers for the delivery of our products. In addition, we use local suppliers for facilities management of our office related to general services such as security, catering, car lease, travel, and insurance. All prospective supplier engagement is assessed for potential human rights risks through Takeda's TPRM Program, aforementioned.

Regarding Neuchâtel site, primary business engagement in the supply chain presented limited exposure to child labor risks for direct suppliers with key services focused on laboratory equipment, engineering-related services and maintenance.

Regarding products sold locally by the reporting entities, we source commodities throughout our business, including direct materials which may present potential human rights risks beyond direct third party relationships. We work to understand the potential risks associated with our global procurement activities, including through collective action with the PSCI and we aim to define appropriate standards including certification and controls within our existing processes.

## **Remedies and grievance mechanisms**

We provide access for employees and stakeholders to raise concerns, including human rights related concerns. Takeda's Ethics & Compliance function has the responsibility for receiving, assessing, and handling in scope concerns of misconduct in

accordance with our Global Policy on Raising and Handling Concerns.

Takeda provides the confidential [Takeda Ethics Line](#), a hotline available 24 hours a day for internal and external stakeholders to facilitate confidential reporting of any ethical concerns. A dedicated category to report potential concerns related to Human Rights is included in the channel.

In 2024, no concerns reported through Takeda Ethics line were related to risks of potential human rights violation.

### *Right to request information*

Takeda Ethics Line includes the possibility for any stakeholder to submit questions and exercise their right to request information under the Norway Transparency Act.

## **Building knowledge and capabilities**

All Takeda employees are trained on Takeda's Global Code of Conduct, which reflects our Human Rights Commitment. Furthermore, scenarios to raise awareness on potential human rights risks were included as part of the enterprise-wide rollout of Takeda's Procurement e-learning in FY24.

## **Engagement and advocacy**

Takeda is engaged in various collaborative efforts, including the PSCI. We endorsed the [PSCI Principles for Responsible Supply Chain Management](#), actively participate in PSCI's Sub-Committees, including for Human Rights.

## **Track and communicate**

### **Measuring effectiveness**

We are monitoring the effectiveness of the processes and procedures to address human rights impacts that our business may cause, contribute to, or is directly linked to, in line with the UNGPs. Over the subsequent reporting period, we will continue to review, assess, and develop further



metrics to assess the effectiveness of our actions, in line with continuous improvement, to identify and manage human rights impacts, including by:

- Tracking our actions and outcomes
- Partnering with suppliers and other external partners
- Undertaking regular internal governance and external assurance processes.

Based on the results of these processes we will continue adapting and strengthening our actions to improve our response to potential human rights impacts.

### External disclosures

All our Environmental, Social and Governance (ESG) related disclosures can be found on Takeda's [Global Sustainability Disclosures Portal](#).

## Entity specific information

### Consultation with reporting entities

In preparing this statement, representatives from the relevant reporting entities were consulted to ensure the Statement appropriately reflects the practices of each reporting entity.

## Governing bodies approval

**This statement was approved by the board of directors of Takeda Pharmaceuticals International AG in their capacity as principal governing body of Takeda Pharmaceuticals International AG**

*This statement is approved by **Jean-Luc DELAY** as President of the EUCAN Business Unit and member of the Board of Takeda Pharmaceuticals International AG for and on behalf of Takeda Pharmaceuticals International AG and Takeda International - UK Branch, and with Takeda Pharmaceuticals International AG being the sole shareholder of Takeda Pharma AG as representative of the sole shareholder for Takeda Pharma AG.*

DocuSigned by:

*Delay, Jean-Luc*

B7CB68975B2C4DD...

*This statement is approved by **Remco LEMARCQ** as Regional General Counsel EUCAN and member of the Board of Takeda Pharmaceuticals International AG for and on behalf of Takeda Pharmaceuticals International AG and Takeda International - UK Branch, and as a member of the Management Board of Baxalta Manufacturing Sàrl for and on behalf of Baxalta Manufacturing Sàrl, and with Takeda Pharmaceuticals International AG being the sole shareholder of Takeda Pharma AG as representative of the sole shareholder for Takeda Pharma AG.*

DocuSigned by:

*Remco Lemarcq*

904DD5F10A7B442...

**This statement was approved by the board of Takeda UK Limited in their capacity as principal governing body of Takeda UK Limited in accordance with the UK Modern Slavery Act (2015)**

*This statement is approved by **Şeyda ATADAN MEMİŞ** as Director and member of the Board of Takeda UK Limited*

DocuSigned by:

*Şeyda atadan Memis*

0C8667E57E8E470...

*This statement is approved by **Peter GRUBIN** as Director and member of the Board of Takeda UK Limited*

DocuSigned by:

*Peter Grubin*

DD15BC8503D1481...

**This statement was approved by the board of Takeda Pharmaceuticals Australia Pty Ltd limited in their capacity as principal governing body of Takeda Pharmaceuticals Australia Pty Ltd in accordance with the Australian Modern Slavery Act (2018)**

*This statement is approved by **David PEARCE** as Director and member of the Board of Takeda Pharmaceuticals Australia Pty Ltd*

DocuSigned by:

**David PEARCE**

24CB845EADB9401...

*This statement is approved by **Anton-Johan VERHEUL** as Director and member of the Board of Takeda Pharmaceuticals Australia Pty Ltd*

Signed by:

**Hans VERHEUL**

1AFB2BD71016460...

**This statement was approved by the board of Takeda Canada Inc. in their capacity as principal governing body of Takeda Canada Inc. in accordance with the Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act (2023)**

*This statement is approved by **Richard DAHL** as Director and member of the Board of Takeda Canada Inc.*

DocuSigned by:

**Richard Dahl**

74EB6F08FE5B4E8...

*This statement is approved by **Matthew CASTELLARIN** as Director and member of the Board of Takeda Canada Inc.*

DocuSigned by:

**Matthew Castellarin**

AEB9A366E4FB431...

**This statement was approved by the board of Takeda AS in their capacity as principal governing body of Takeda AS. in accordance with the Norway Transparency Act (2022)**

*This statement is approved by **Koki SATO** as Director and member of the Board of Takeda AS*

DocuSigned by:

**koki sato**

D3E7254FCF044EB...

*This statement is approved by **Oyvind LOKEBERG** as Director and member of the Board of Takeda AS*

DocuSigned by:

**Oyvind Lokeberg**

09189D5953B044F...