



*Better Health, Brighter Future*

GLOBAL CODE OF CONDUCT

# Living Our Values Every Day



**Patient**

**Trust**

**Reputation**

**Business**



As Takeda employees, we make decisions and take actions that can affect people's lives. This is a noble purpose, one that demands the highest standards of ethical behavior.

The Takeda Global Code of Conduct gives us a framework for achieving these standards. It sets out the principles we must follow every day. It also helps us preserve the integrity that is ingrained in our heritage, and which underpins Takeda-ism and our priorities of Patient-Trust-Reputation-Business.

Whatever our role at Takeda, we're all responsible for bringing the Code's principles to life. It is part of our commitment to patients, to each other and to society at large. It's also part of our commitment to the organization, because acting ethically is the only way Takeda can achieve its mission.

Please take time to read the Takeda Global Code of Conduct, absorb it and then, most importantly, live it.

**The Takeda Executive Team**



# Patient

We all contribute in some way to Takeda's primary purpose – providing medicines, vaccines and other healthcare products that are safe and effective, and that can change lives for the better. That's why our first question must always be: "is it right for patients?"

- We put the health, well-being and safety of patients first
- We respect patients and protect their privacy
- We have appropriate and fair relationships with patient organizations
- We provide objective and accurate information about our products and the diseases they treat or prevent
- We respect the relationships between patients and their healthcare professionals





**We put the health, well-being and safety of patients first**

Whatever our role at Takeda, the needs of patients are our first and most important consideration.

Integrity in our research, manufacturing, distribution and other activities is central to our philosophy as a company. We are committed to providing appropriate access to our products and services. And, whether acting independently or in collaboration with other organizations and governments, we strive to find solutions that have a sustained and meaningful impact on patients.

We address product complaints and other product issues quickly and transparently.

**We respect patients and protect their privacy**

Personal information or data about patients is used only for legitimate purposes, in accordance with applicable requirements, and only if all necessary consents have been obtained. We take appropriate steps to protect patient information or data.

**We have appropriate and fair relationships with patient organizations**

Appropriately and ethically supporting patient organizations, and working with them to improve patient care, helps us contribute to better health. Avoiding conflicts of interest and undue influence in these interactions is essential.

**We provide objective and accurate information about our products and the diseases they treat or prevent**

We are committed to making available information about our products and the diseases they treat or prevent. When we share information through advertising, promotional or educational activities, we use appropriate channels in accordance with applicable requirements. And we ensure that the information is accurate, fair, balanced and based on scientific evidence.

**We respect the relationships between patients and healthcare professionals**

If patients approach us on matters relating to their medical treatment, we direct them to seek advice from a healthcare professional.

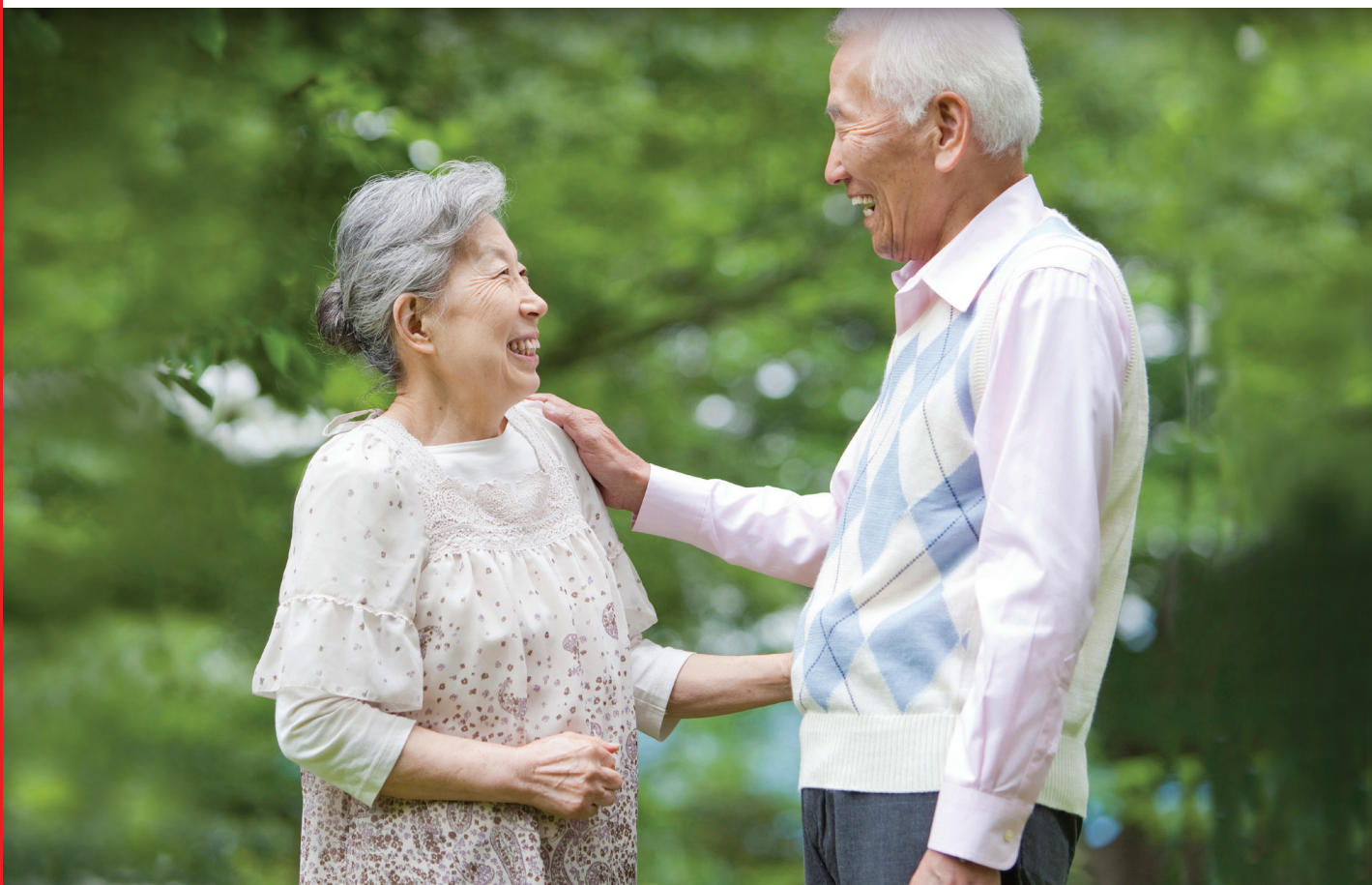
We never promote Takeda products for off-label indications.



# Trust

We build trust with society through ethical actions and decisions, so that we can meet Takeda's commitments to patients and to our internal and external stakeholders.

- We create a diverse, inclusive, safe, open and collaborative working environment in which employees can contribute, perform and grow as individuals
- We respect and protect the property and information of others
- We encourage honest conversations, as well as diversity of thoughts and opinions
- We speak up for integrity



**We create a diverse, inclusive, safe, open and collaborative working environment in which employees can contribute, perform and grow as individuals**

Takeda is committed to providing a safe and healthy working environment, and to having a workforce that is as diverse as the patients we serve and the communities where we're based. To achieve that inclusivity, we embrace and celebrate our differences, respecting and valuing each other regardless of race, color, sex, age, national origin, religion, gender identity, sexual orientation, disability or physical appearance.

Our commitment to an environment free of harassment and discrimination means all colleagues, business partners and external stakeholders are treated with courtesy, consideration and professionalism.

We hire, develop, evaluate and promote employees based on merit, their suitability for the job and their potential, so that they are empowered and inspired to support our goals.

We take care to avoid perceptions of favoritism or misuse of authority. And we exercise sound judgment to avoid potential or actual conflicts of interest.

**We respect and protect the property and information of others**

As a responsible corporate citizen, Takeda respects the confidentiality and valid intellectual property rights of third parties. We have processes that are designed to avoid infringement of the rights of others.

We collect personal information or data for legitimate purposes only and use it appropriately. We also protect the privacy of personal information or data.

**We encourage honest conversations, as well as diversity of thoughts and opinions**

Building trust means empowering and encouraging employees to share ideas and make active contributions to discussions. All opinions are respected, acknowledging that this can lead to better solutions and decisions.

We ask questions if we're not clear on our roles and responsibilities at Takeda, as well as the impact of the decisions we make and the company's expectations.

**We speak up for integrity**

It's our personal responsibility to speak up if we think that actions or decisions might put the company at risk, or if we believe in good faith that our values are being put at risk by the behavior or decisions of others, including suppliers or third parties.

All concerns are addressed promptly, confidentially and respectfully. Swift and appropriate action is taken against any behaviors or practices that are not in line with our values and our Global Code of Conduct.

No retaliatory action is taken against any colleague who raises a concern in good faith.





# Reputation

Our actions and decisions on behalf of Takeda can affect perceptions of the company, so we consider the potential impact of everything we do on the company's hard-earned reputation.

- We are objective and transparent when interacting with healthcare professionals
- We strive for the highest standards of integrity in our research activities
- We are honest and fair when interacting with external stakeholders
- We avoid actions that may conflict with the company's interests
- We aim to make a positive impact on the communities in which we operate





### **We are objective and transparent when interacting with healthcare professionals**

Our interactions with healthcare professionals are designed to benefit patients. We don't promise, offer or provide money, gifts, services, hospitality or other items of value to improperly influence or reward the prescription, use, administration, purchase or recommendation of our products. When we do hire the services of healthcare professionals, we pay no more than the fair market value.

### **We strive for the highest standards of integrity in our research activities**

We are committed to disclosing our clinical trial results transparently, regardless of outcome. Access to our clinical trial databases is available to support appropriate independent research.

We take steps to prevent and deter scientific misconduct in proposing, conducting or reporting research.

### **We are honest and fair when interacting with external stakeholders**

Our long-standing good reputation is reinforced by a commitment to make sure our communications are accurate and can be substantiated. We are honest, respectful, fair and appropriate in our interactions with regulatory and other public bodies, and when engaging with our competitors and industry colleagues.

We avoid conflicts of interest and the perception of improper influence or corruption in our interactions with government officials, government entities and other external stakeholders.

As part of our respect for and commitment to open competition, we only collect and use competitive information obtained through public or authorized sources and means.

### **We avoid actions that may conflict with the company's interests**

Working outside the company, or holding a material financial interest in a competitor, customer or supplier during our employment with Takeda could interfere with Takeda's interests. We only accept or engage in such activities if they are transparently disclosed and agreed with the company.

We don't use material non-public information to improperly benefit ourselves or others.

We use fair and objective criteria in the selection of suppliers or third parties that act on our behalf, based on legitimate business needs and without favor or preference due to a personal relationship, investment or association.

During the selection process, and throughout any subsequent relationship, we don't ask for, or accept, money, gifts, services, hospitality or other item of value from existing or potential suppliers, customers or third parties as a condition or reward for working with Takeda.

We make sure our personal and political activities do not compromise our role and responsibilities at Takeda.

### **We aim to make a positive impact on the communities in which we operate**

Recognizing our role as a good corporate citizen, we constantly seek to make contributions that benefit society, and use our shared knowledge to find better solutions for patients. Part of this commitment is to minimize the environmental impact of our products and operations, and to constantly strive for quality and continuous improvement in everything we do.



# Business

By focusing on our commitments to patients, our customers and society, we develop our business and achieve sustainable results.

- We treat the company's property and information with due care, and use it only for the purposes intended
- We conduct our business with integrity
- We act responsibly when communicating about the business of Takeda



**We treat the company's property and information with due care, and use it only for the purposes intended**

Takeda's financial resources and other property are valuable assets, so we use them only to carry out legitimate activities on behalf of the company. Financial, operational and other business transactions are recorded accurately, in accordance with applicable internal and external requirements.

We make sure that confidential Takeda information, including personal information or data, as well as intellectual property owned, developed, obtained or controlled by the company through research, development and other activities, is protected appropriately.

Takeda assets and confidential information are stored in authorized locations. They are only shared with a third party for legitimate purposes, and if we have permission or other legal authority to do so.

We promote the appropriate, effective and lawful use of Takeda computers and other IT systems, safeguard devices containing Takeda information, install only authorized software, and stay vigilant when using these devices in public places.

**We conduct our business with integrity**

We act with integrity in our dealings with suppliers and third parties. We don't exchange competitive information with industry colleagues or engage in anti-competitive practices. We don't accept, offer or provide bribes and don't allow a third party to conduct, on our behalf, any activity that we're prohibited from doing ourselves.

We are responsible for knowing the third parties with which we interact. We conduct appropriate due diligence on suppliers and other third parties based on the nature of their activities and our relationship with them. We also make sure that any third parties that act on our behalf, or provide us with goods and services, comply with Takeda standards where appropriate.

**We act responsibly when communicating about the business of Takeda**

Delivering financial or operational information to governments, regulatory bodies, investors, the media, and other stakeholders is only carried out by those who have permission to do so. Information delivered must be accurate, reliable and timely.

We engage in public policy issues through responsible lobbying activities, with the objective of improving health outcomes.

We are careful when writing emails and other communications about or for Takeda, to ensure accuracy and relevance, to prevent misinterpretation and to avoid risk to the company's reputation.

We only use social media and other communication channels for business purposes and if we have permission to do so. We use discretion and sound judgment when we discuss Takeda on any personal social media or communication channel.

At no time do we use defamatory or insulting language when using any communication channel for Takeda-related purposes.





## **We Support Each Other**

If you have a question or want to raise a concern, please contact a colleague, a manager, a member of the Takeda Executive Team or a member of the Human Resources or Global Ethics & Compliance function.

You can also ask questions or report a concern at [www.takeda.ethicspoint.com](http://www.takeda.ethicspoint.com). While we encourage employees to identify themselves, reports can be made anonymously.

*There are additional policies and standard operating procedures embodying the spirit of the Global Code of Conduct available to guide us in our day to day work.*