

Living Our Values Every Day

Global Code of Conduct
#LOVED

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“We should make the Code of Conduct our companion. Let’s keep it close at hand, refer to it frequently, and use it to confidently make decisions and take actions we can be proud of.”

– Takeda Executive Team



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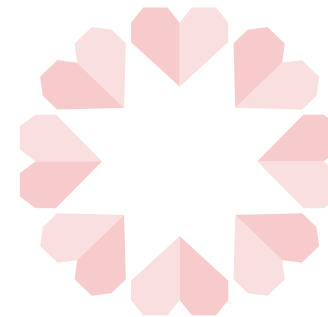
Our Values: A Foundation for Ethical Behavior

Takeda is proud to have a values-based culture as its strong foundation. And we understand our responsibility to meet the highest standards of ethical behavior at all times, because everything we do impacts the most vital aspect of people's lives — their health. This is reflected in our purpose: better health for people, brighter future for the world.

Takeda has evolved significantly since the company was founded by Chobei I in 1781. What started out as a small broker of traditional medicines in the emerging Japanese city of Osaka is now a global, R&D-driven biopharmaceutical company headquartered in Japan, which is positioned and equipped to discover and deliver life-transforming treatments.

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 our patient 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 Patient-Trust-Reputation-Business underpin everything we do and how we do it.

Our Global Code of Conduct is based on principles that are organized around Patient-Trust-Reputation-Business. It embodies the spirit of Takeda — what we stand for and how we conduct ourselves. Bringing the Code to life makes sure that we are “Living Our Values Every Day”.



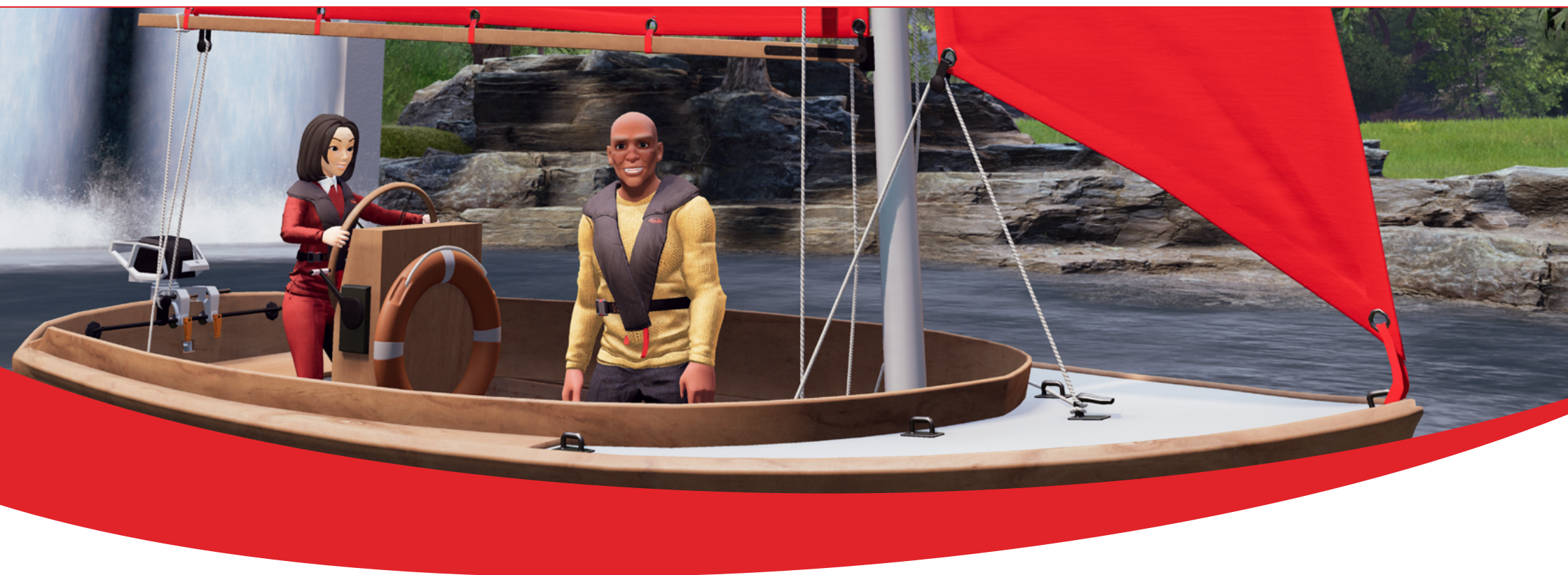


Patient

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 ethical 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

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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 foster a diverse, equitable, inclusive, safe, open and collaborative working environment in which employees can contribute, perform and grow as individuals
- We are objective in developing our employees and in the performance of our work
- We respect and protect the property and information of others
- We encourage honest and open conversations, as well as diversity of thoughts and opinions
- We speak up for our values

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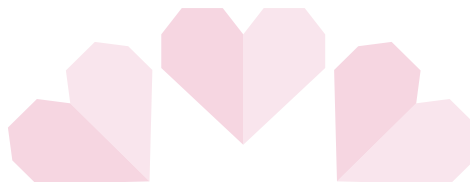


Reputation

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 our 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 act responsibly when communicating about Takeda
- We aim to make a positive impact on the communities in which we operate

[Go to Reputation Detail](#)





Business

By focusing on our commitments to patients, our customers, Takeda employees and our planet, we achieve sustainable business results.



- We make sure to develop a sustainable business
- 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 avoid actions that may conflict with the company's interests

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Patient

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. We also consider the needs of patients' families and caregivers.

Integrity in our research, development, 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 globally.

We act responsibly when utilizing emerging technologies in our activities.

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 necessary steps to protect patient information and data.

We have appropriate and ethical relationships with patient organizations

We support patient organizations to improve patient care and contribute to better health.

We avoid conflicts of interest and undue influence in our interactions with patient organizations and their representatives. We value their independence and encourage transparency about our collaborations.

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.

Regardless of the channel used, whether digital or in person, we make sure that the information provided 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 foster a diverse, equitable, inclusive, safe, open and collaborative working environment in which employees can contribute, perform and grow as individuals

Takeda is committed to having a workforce that is as diverse as the patients we serve and the communities where we're based. We embrace and celebrate our differences, respecting and valuing each other's race, ethnicity, age, gender, gender identity, nationality, social origin, religion, sexual orientation, disability, physical appearance and other individual characteristics.

We promote the well-being of each employee, providing a safe and healthy working environment and working conditions that enable our colleagues to thrive.

We nurture a working environment that's free of harassment, bullying and any form of discrimination or prejudice. This means treating all colleagues, business partners and external stakeholders with respect, courtesy and professionalism.

We are objective in developing our employees and in the performance of our work

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

We exercise sound judgment in the performance of our work. We make business decisions fairly and objectively, and do not let personal, financial or other outside interests affect our ability to make objective business decisions. We take particular care to avoid the appearance of favoritism, preferential treatment or misuse of our position to benefit relatives, friends or people with whom we have a close personal relationship.

We develop trust by proactively disclosing personal, financial or outside interests that may interfere or conflict with Takeda's interests.

We respect and protect the property and information of others

Takeda respects the confidentiality and valid intellectual property rights of third parties. We make sure that our processes 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 take care to protect the privacy of personal information or data.

We respect patient autonomy and provide appropriate controls and safeguards for data sharing within Takeda and with third parties.

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

Building trust and an inclusive environment means empowering each other to speak up. We lead by example, actively encouraging others to share ideas and making active contributions to discussions. When others speak up, we listen and respect their opinions, 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, the impact of the decisions we make, or the company's expectations.

We only use language that reflects our values, avoiding the use of defamatory, discriminatory, abusive, threatening or insulting language.

We speak up for our values

We are personally responsible for speaking up if we believe that any actions, behaviors or decisions could put our company or our values 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 raised are addressed promptly, confidentially and respectfully. Timely and appropriate action is taken against any behaviors or practices that are not in line with our values and our Global Code of Conduct.

We do not retaliate against any colleagues who raise concerns.





Reputation

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 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, and publishing the results of Takeda-supported research in journals that provide open access. 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, meaningful 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 act responsibly when communicating about Takeda

We deliver financial or operational information to governments, regulatory bodies, investors, the media, and other stakeholders only if we are qualified or authorized 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 if we are adequately trained to do so. We use discretion and sound judgment when discussing Takeda on any personal social media or communication channels.

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

As a responsible corporate citizen, we seek to make contributions that benefit society. We use our shared knowledge to find better, sustainable solutions for all patients, wherever they live.

We continuously anticipate and assess the potential consequences of our decisions for patients, our people, the planet and Takeda.

We will harness our unique capabilities to deliver the highest standards of environmental leadership, to protect our planet's nature systems and human health.

We respect and protect human rights – within our own business, across our supply chains and in the communities where we operate, paying particular attention to vulnerable populations.





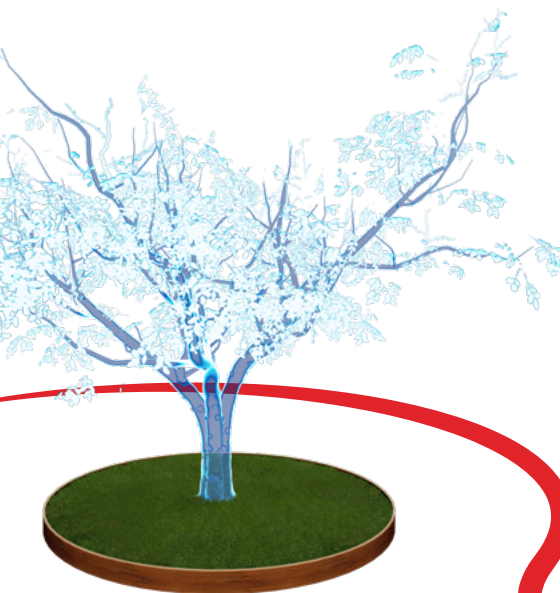
Business

We make sure to develop a sustainable business

Whatever our role, we consider the impact of our decisions and actions on our future, meeting current objectives without compromising longer term opportunities and aspirations.

We make sure to develop a sustainable business, taking appropriate measures to detect, minimize and manage risk. We only take risks that are appropriate for our role, our responsibility and our delegation of authority.

We communicate the risks we face and the actions we take to mitigate them transparently, accurately, and in a timely manner to support purposeful decision making.



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. We store them in authorized locations. We record financial, operational and other business transactions accurately, in accordance with applicable internal and external requirements.

When collaborating with third parties, we provide only the information needed for legitimate business purposes.

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

We are committed to protecting Takeda's technology. We promote the appropriate, effective and lawful use of Takeda computers and other IT systems. We safeguard devices containing Takeda information, install only authorized software, and stay vigilant when using these devices at home and 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, or receive any personal or financial benefit from a supplier, customer or company that does business with Takeda. We 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 make sure that any third parties acting on our behalf, or providing us with goods or services, comply with Takeda's ethical standards.



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 or conflict with Takeda's interests. We only accept or engage in such activities if they are disclosed transparently and agreed with the company.

We use material non-public information properly and never for undue benefit to 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 personal benefit from existing or potential suppliers, customers or third parties as a condition or reward for doing business with Takeda.

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



Our Commitment: Living Our Values Every Day

Whatever our role and wherever we are, we take personal accountability for upholding the company's values, for making decisions that benefit patients, colleagues and society, and for the way we conduct ourselves. The Takeda Global Code of Conduct acts as our guide.

The Code encourages ethical reasoning, empowering us to confidently make decisions that are consistent with our values and meet the high ethical standards forged throughout our proud history. We always ask ourselves “should we do this” rather than “can we do this”.





Values-based Decision Making

When faced with a difficult decision or an ethical dilemma, we use a framework to make decisions that we can be proud of today and in the future.

We ask the following questions based on Patient-Trust-Reputation-Business, in this order:

1

First, is it right for the **Patient**?

- What is the benefit to the patient of your decision?
- Is there a possibility your decision could cause harm to a patient?
- If the patient had all the information you have, do you think they would agree with that decision?
- Imagine someone close to you who is a patient, would your decision change?



2

Second, does it build **Trust** with society?

- How will my stakeholders perceive my actions and behavior?
- Can other people clearly tell by the things I do that I really do have their best interests in mind?
- Does this decision build trust between me and my colleagues?
- Will my actions increase confidence in me and in Takeda?



Then, does it reinforce Takeda's **Reputation**?

- If someone close to me knew about my decision, would I still make the same decision?
- Do my actions reflect Takeda-ism?
- Will my actions lead others to have a positive opinion of me or Takeda?
- How will my action be perceived by the public, as a newspaper headline or on TV?

3

Finally, does it help us develop a sustainable **Business**?

- Is this the best use of our resources?
- Will my decision meet the needs of the present without compromising the future?
- Would Takeda employees be proud of my decision?
- How would our stakeholders view my decision?

4





Supporting Each Other

We support colleagues in living our values every day and contribute to the creation of an environment where everyone feels able to speak up, secure in the knowledge that others will listen.

If you have a question or want to raise a concern, speak to someone you trust, your manager, a Values Ambassador if appropriate, your contacts in Human Resources or Ethics and Compliance, or a member of the Takeda Executive Team. Your question or concern will be addressed in a timely manner.

You can also raise concerns through the Takeda Ethics Line (<http://www.takeda.ethicspoint.com>) — sharing your name and contact details if you want to, or anonymously if you'd prefer. All reports are treated confidentially.

Learn More

Additional resources and guidance about the principles set out in the Code can be found on the [CoC site](#).

More specific information about our policies, procedures and guidelines is also available.

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