



Takeda has established a framework of global policies on anti-corruption and is continuing to ensure compliance with these.

Takeda ensures strict adherence to the laws of each country, the Code of Practice of the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) and its member associations, as well as applying high ethical and moral standards based on Takeda-ism with a priority on ensuring the health and safety of people all over the world. Takeda has a dedicated anti-corruption global policy that reinforces our zero-tolerance position against corrupt practices in all our business dealings.

### The Takeda Global Code of Conduct

The Takeda Global Code of Conduct gives us a framework for achieving the ethical and moral standards we aspire to. It sets out the principles we must follow every day and helps us preserve the integrity that is ingrained in our heritage, and which underpins Takeda-ism and

our priorities of Patient-Trust-Reputation-Business. The Global Code of Conduct applies to all Takeda employees and enables all of us to make everyday decisions in line with our Values.

**See** P.24 Compliance



### Fair Promotion Activities

Takeda has established a Global Policy on Interactions with Healthcare Professionals and Healthcare Entities to ensure that these interactions comply with all applicable laws, regulations, industry codes and Takeda's global standards.



30,000

Number of employees who will be trained on Takeda Global Code of Conduct in 2017

## Future Outlook

Issues and Initiatives  
Going Forward

In order to implement our policies as effectively as possible in line with the situation in each country, and to ensure that they are followed, we are continually developing individual standard operating procedures for each country. We have implemented a comprehensive monitoring program to evaluate adherence with our policies and procedures in the conduct of our high risk business activities. Going forward, we will take further measures to ensure compliance, for example implementing a compliance-related risk assessment to ensure we continue to build a best-in-class and sustainable compliance program that puts the patient at the center of everything we do.

### Global Policies Related to Anti-Corruption



Related SDGs

16: Peace, Justice and Strong Institutions

Takeda Global Code of Conduct

Global Anti-Corruption Policy

Global Investigations Policy

Global Policy on Interactions with Patient Organizations and Patients

Global Policy on Interactions with Healthcare Professionals and Healthcare Entities

Global Policy on Interactions with Government Officials and Government Entities

## Anti-Corruption

We follow the principles set out in the Takeda Global Code of Conduct as well as all relevant policies in all our daily business activities and strive to prevent corruption throughout the entire Takeda Group.

### Anti-Corruption

#### We Will Ensure Compliance with Our Policy for Anti-Corruption and Anti-Bribery

The United Nations Global Compact principle on anti-corruption is principle 10: “Businesses should work against corruption in all its forms, including extortion and bribery.” Companies are expected to establish policies and programs to counter corruption.

The principles included in the Takeda Global Code of Conduct prohibit corruption and bribery, and strictly forbid offering bribes (including money, goods, hospitality, gifts, or any other item of value) to national and foreign government officials and private-sector employees. More detailed guidelines are set out in the Global Anti-Corruption Policy as well as other global policies such as the Global Policy on Interactions with Government Officials and Government Entities.



#### Related SDGs

16: Peace, Justice and Strong Institutions



#### Global Anti-Corruption Policy/ Key Principles (Extract)

- Takeda prohibits the offer or use of any illegal or improper inducement, bribe or corrupt transfers of Anything of Value in order to gain any unfair or improper advantage for our business, whether in dealings with Government Officials, Government Entities or the private sector.
- Takeda will not conduct through a Third Party Intermediary acting on its behalf any activity that it is prohibited from doing itself.
- Takeda employees who engage Third Party Intermediaries must ensure those Third Party Intermediaries are informed of the requirements set forth in this Policy and agree to adhere to them.
- Takeda will not pay, authorize to pay or offer Facilitation Payments.
- Takeda will conduct appropriate due diligence on Suppliers and other Third Party Intermediaries based on the nature of their activities and our relationship with them.
- Takeda will maintain accurate books, records and accounts in reasonable detail to ensure no payments are made for any purpose other than that which is accurately described.



## Transparency Guideline

### **Relationship with Medical Institutions and Patient Groups**

As a member of an industry related to people's lives, society expects Takeda to maintain a highly ethical culture. We aim to earn even higher levels of trust from society by increasing the transparency of our relationships with medical institutions. Medical institutions play an indispensable role in several aspects of our business, including medical and pharmacological life science research, application, and dissemination of the correct use of pharmaceutical products.

We also cooperate with patient groups, including by providing them with funding. Our relationships with patient groups must be ethical and emphasize independence. Takeda has a Global Policy on Interactions with Patient Organizations and Patients, and will strive to ensure that its exchanges are based on integrity, honesty, fairness, and transparency.

Furthermore, international society is calling for greater transparency and disclosure of information from pharmaceutical companies about their activities. In the U.S., the Affordable Care Act (ACA) of 2010 created the "Sunshine Act," which aims

to increase public awareness of financial relationships between drug and device manufacturers and healthcare providers. In Japan in 2011 a guideline was formulated for ensuring transparency in the relationship between corporate activities and medical institutions, and in 2012 a guideline was formulated on transparency in the relationship between corporate activities and patient groups. Furthermore, in Europe the European Federation of Pharmaceutical Industries and Associations (EFPIA) requires disclosure of transfers of value starting from June 2016 in the markets under its jurisdiction.

In line with these requirements, Takeda discloses related information such as provision of funds in accordance with the situation in each country.