

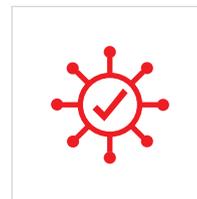
# Ethics and Compliance



**As a value-based company, we believe our obligation to meet ethical standards goes beyond compliance with laws and regulations.**

This is expressed through our priorities, Patient, Trust, Reputation, Business, which in turn are based on our values of “Takeda-ism” — Integrity, Fairness, Honesty, and Perseverance. To promote ethical behavior and provide guidance to our employees, we have created the Takeda Global Code of Conduct, which is available in 18 languages and lays out a core set of principles for conducting business at Takeda.

Promoting ethics and compliance across Takeda’s operations is the responsibility of the Chief Ethics & Compliance Officer and the Risk, Ethics & Compliance Committee. Both ensure a coordinated, company-level approach on ethics and compliance matters. Takeda group companies execute and reinforce their ethics and compliance programs in line with the Takeda Global Code of Conduct and applicable global policies. These policies are approved by the Business Review Committee (BRC).



Takeda aims to maintain the highest level of corporate ethics. The Takeda Ethics Line is available online and by phone to all employees around the world, 24 hours a day. Employees can contact the Takeda Ethics Line, which is available in 18 languages, and ask a question or voice a concern. In the first six months of FY2019, we received 94 calls and web entries through the Takeda Ethics Line. Takeda has a policy of nonretaliation for any employee who raises a concern in good faith.



## Anti-Corruption

Takeda is committed to conducting business with integrity at all times. This includes ensuring that our business practices and decisions are conducted in line with Takeda's values and in compliance with external regulations.

The Global Anti-Corruption Policy and the Global Policy on Interactions with Government Officials and Government Entities outline key principles that guide the conduct of Takeda employees. Illegal or improper inducements, bribes, or corrupt transfers of anything of value may not be offered or used. Facilitation payments may not be paid or authorized.

Our Global Anti-Corruption Policy prohibits Takeda from conducting, through third-party intermediaries, activities that Takeda is prohibited from conducting itself. Third-party intermediaries must adhere to the requirements of the Global Anti-Corruption Policy. Takeda must conduct a due diligence assessment of third-party intermediaries in order to identify and address issues that pose any actual or potential risks for Takeda.

We conduct regular internal audits to assess instances of bribery and corruption, and we also have in place a monitoring program through which we review a sample of high-risk transactions to ensure compliance. In 2019, Takeda is also deploying a new enterprise risk assessment process, which includes an assessment of compliance risks. Our Global Code of Conduct and internal policies require all employees to keep accurate books, records, and accounts in reasonable detail to ensure no payments are made for any purpose other than those that are accurately described.