



DAIICHI SANKYO, INC.
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Daiichi Sankyo Shared Standards

At Daiichi Sankyo, we value our relationships with contractors, consultants and suppliers, and acknowledge your role in helping us to provide medicines and healthcare solutions to people around the world.

We are committed to working with our contractors, consultants and suppliers in an ethical and honest manner. We believe that every business decision must comply fully with our own policies, and with all applicable laws and regulations.

Daiichi Sankyo's commitment to compliant behavior has its foundations in the basic principles of ethical behavior: telling the truth; respecting confidentiality; respecting the rights of others; and following the law. We are resolute in our commitment to compliant behavior, and expect the same commitment from our contractors, consultants and suppliers. It is important that you read, understand and follow our Standards of Business Conduct while working with Daiichi Sankyo, and that you share our understanding of, and act according to, acceptable business and workplace behaviors.

Any service provided to Daiichi Sankyo must be performed in accordance with our Standards of Business Conduct, and in full compliance with all applicable laws and regulations. In addition, all employees and contractors acting on Daiichi Sankyo's behalf in dealing with healthcare professionals must perform their duties and responsibilities in accordance with Daiichi Sankyo policies and applicable laws. Policies related to payments to, or items of value given to, healthcare professionals are available from your Daiichi Sankyo business contact or the Daiichi Sankyo Compliance Department.

This leaflet will highlight some important Daiichi Sankyo vendor-related standards with you, and will direct you to our website and toll free number to obtain additional information related to our compliance program.

Standards for Purchases and Payments

Daiichi Sankyo policy is to make all purchases from qualified suppliers and contractors in accordance with applicable law and our policies using Daiichi Sankyo standards contracts and contracting protocols (information on the Daiichi Sankyo diversity business program is available on our website). Neither we nor our agents will suggest or imply that any purchases of goods, contracting of services or sales by Daiichi Sankyo are dependent on reciprocal purchases or sales from Daiichi Sankyo.

Standards of Confidentiality

We acknowledge and respect the confidentiality of information provided by our contractors, consultants and suppliers, and expect that confidential information provided by Daiichi Sankyo to any third-party will be treated with the same respect.

Standards for Clinical Research Activities

It is Daiichi Sankyo's policy that all clinical research activities are conducted according to accepted and appropriate ethical, scientific, and clinical research standards. All contractors, agents, clinicians and others working with Daiichi Sankyo are required to conduct their activities in accordance with applicable law, regulation and Daiichi Sankyo policy.

Standards of Professionalism

Daiichi Sankyo policy dictates that conflicts of interest must be avoided, and that any potential conflicts must be disclosed to your business contact and Daiichi Sankyo's Compliance Department. Daiichi Sankyo policy is to avoid entering into business relationships with persons who are related to a Daiichi Sankyo employee.

Standards for Interactions with Health Care Professionals and Customers

It is vital that all of Daiichi Sankyo's interactions with health care professionals and customers comport with ethical and legal standards. Daiichi Sankyo, and anyone acting on our behalf, may not provide any item of value or pay any fee, honorarium, grant, etc. for the purpose of inducing a health care professional or customer to purchase, prescribe, order or take any other action with respect to our product. Each Daiichi Sankyo contractor and consultant is required to adhere to the same standards for interactions with health care professionals and customers that are required of Daiichi Sankyo and its employees.

Standards for Gifts and Entertainment

Whenever the exchange of gifts or entertainment accompanies business activity, there is a risk that the exchange compromises, or appears to compromise, ethical business behavior. In response, Daiichi Sankyo has adopted strict rules regarding the receipt of gifts by its employees from vendors; gifts from Healthcare Professionals and/or Customers (as those terms are defined by Daiichi Sankyo) are never permitted. Daiichi Sankyo's rules in this regard can be summarized as follows:

In general, the following rules apply to any gift provided to our employees regardless of the source: the gift should never compromise or create the appearance of compromising the Daiichi Sankyo employee's professional judgment; the gift should never compromise or create the appearance of compromising Daiichi Sankyo's integrity; the gift should never interfere with a Daiichi Sankyo employee's job responsibilities; and cash or cash equivalent gifts are also never acceptable as gifts.

Provided all of the above rules are complied with there are certain limited circumstances wherein a gift may be provided to Daiichi Sankyo employees: (a) Tangible gifts (valued at the amount that the employee would have to pay to purchase it on his/her own in the market place) can be given to employees provided that they do not exceed \$200; (b) Gifts of Entertainment from a vendor to a Daiichi Sankyo employee of tickets to a sporting event, concert, theater and/or similar entertainment event are permitted provided that the face value or declared value of the ticket to such event does not exceed \$500; (c) Business Meals may be provided to Daiichi Sankyo employees provided that the employee's attendance at the business meal has a legitimate business justification and/or business objective, the vendor participates in the meal and the cost of the business meal provided to the employee must be reasonable as judged by local standards; (d) Vendor contests are permissible provided that the gift has been determined on the basis of a drawing, lottery or comparable selection process and the value of the contest gift does not exceed \$2000; and (e) Gift of Attendance at a Professional and/or Business Education Event is permissible provided that it is expressly approved by the Daiichi Sankyo employee's supervisor, is otherwise consistent with the general rules described herein and the cost does not exceed \$5000. **Please note that all of the dollar amounts identified herein are on a per**

employee and per vendor basis and tracked on a calendar year basis. Finally, as regards gifts and entertainment, please note that other exceptions and rules may apply in this area and that any questions in that regard should be directed to the employee and/or the Daiichi Sankyo Business Practice and Ethics Department.

Additional Information

If you have any questions or concerns about compliance or ethics issues while working for us, please discuss them with your Daiichi Sankyo liaison or business contact. You can also call our toll-free Hotline (1 877 482 5378) or the Daiichi Sankyo Business Practice and Ethics Department at 973 944 2913 with questions on compliance or ethical issues, to obtain written copies of our compliance program or state certifications, or for any other compliance information. You can also call the Hotline to report unethical or questionable activity.

A copy of our Standards of Business Conduct, state certifications and other compliance materials are available at the Daiichi Sankyo website at www.dsi.com.