Code of Conduct

Mitsubishi Tanabe Pharma

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Message from the CEO

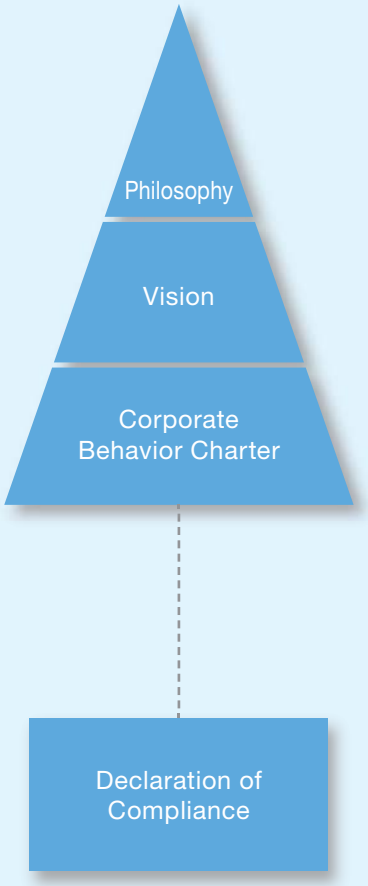
To date, we members of the pharmaceutical industry have contributed to the advancement of medical care primarily by providing methods for treating diseases. Of course, given the multitude of intractable diseases for which there are no existing therapies or treatments and diseases that are difficult to cure completely, the world still needs us to continue “driving innovations” that will lead to the creation of new drugs. We are also obliged to address the challenge of limited access to pharmaceuticals so that we can respond to the pleas of sufferers the world over who are in need of “medicine.”

Meanwhile, as populations across the globe age rapidly, we are also required to support “sustainability of medical insurance systems” if we wish to help the global community to keep developing. The pharmaceutical industry must transform itself into a force for providing innovative means and solutions for expanding healthy life expectancy in people around the world and assisting patients’ rehabilitation into society, so that we can help our society to prosper. Although we still have a long way to go before we can attain that supreme goal, we need to become actively involved in the search for solutions to social issues through proactively and voluntarily responding to ever-changing societal demands.

Out of our sincere aspiration to continue contributing to the good health of people around the world, we at the Mitsubishi Tanabe Pharma Group will work together with Mitsubishi Chemical Holdings Corporation Group companies and players from other industrial sectors across the globe in a wide range of areas, while tapping into the strengths that we have cultivated in the pharmaceutical business. In so doing, we will give serious consideration to the future of medicine in cooperation with patients and healthcare professionals, governments, academic institutions, and local communities, with a view to developing innovative solutions that transcend the conventional boundaries of medical care. We are ready to take the lead in realizing a world in which people can enjoy healthy and happy lives with their loved ones for as long as possible.

Masayuki Mitsuka
President & Representative Director

We at the Mitsubishi Tanabe Pharma Group maintain a commitment to the universal values laid out in our Philosophy of contributing to the healthier lives of people around the world through the creation of pharmaceuticals. We will also achieve renewed growth as we strive to be a global research-driven pharmaceutical company that is widely trusted by society.



Philosophy

We contribute to the healthier lives of people around the world through the creation of pharmaceuticals.

Vision

We strive to be a global research-driven pharmaceutical company that is trusted by society.

Corporate Behavior Charter

We maintain the highest ethical standards, place top priority on fairness and integrity in all activities, and act in accordance with the following guidelines.

Pride and Sense of Mission

As people involved in the creation of pharmaceuticals, we work with pride and a sense of mission as we endeavor to research and develop pharmaceuticals that are needed by society and to ensure product safety and quality.

Challenge and Innovation

With acute sensitivity and a broad perspective, we focus on our future direction, decisively take on the challenge of meeting higher goals, and strive to create innovative value.

Trust and Collaboration

We promote free and open communication to understand and respect each other, and collaborate with mutual trust to maximize our results.

Harmonious Coexistence with Society

We work to achieve harmonious coexistence with society by acting with consideration for local communities and the environment.

Declaration of Compliance

1. We conduct our business with the highest ethical standards and in a professional manner as a global healthcare company.
2. We respect human rights, and promote safe and healthy working environments.
3. We comply with legal requirements and regulations that apply to our businesses and corporate activities.
4. We work actively to protect the global environment and strive to realize harmonious co-existence of the Company and society.
5. We strive to trade and transact business in a fair manner at all times.
6. We appropriately manage company information and data, and work to ensure that company information and data is disclosed in a timely and reasonable manner.
7. We appropriately manage and efficiently use company assets.

Code of Conduct
(Principles for Business Activities)

The Mitsubishi Tanabe Pharma Group Code of Conduct sets forth the basic stance on and specific policies in respect of corporate and individual behavior in line with our Corporate Behavior Charter and Declaration of Compliance toward realization of the Group's Philosophy and Vision. All employees of the Mitsubishi Tanabe Pharma Group are required to understand and comply with this Code and with all other rules and policies of the Group.

Principles for Business Activities

1 CREATION OF PHARMACEUTICALS

1 “Being the first to deliver unique value”

There is nothing more rewarding than to see patients and their family members and friends smiling after successful treatment. Constantly mindful that “everything we do is for the patients and their families who support them”, we strive to clearly distinctive and novel value by creating original and visionary pharmaceuticals in an effort to become a “company that works with a sense of urgency and is the first to deliver unique value”, thereby opening up the future for both patients and the field of medicine as a whole.

2 “Our mission going forward”

There are still many diseases that cannot be treated adequately through existing therapies and large numbers of sufferers who have limited access to medicine. Hence, it is our duty to research and develop innovative new drugs so that we can deliver such pharmaceuticals to those who are eagerly awaiting medicine. Meanwhile, as ever-increasing healthcare expenditure become a major issue in the global community, it is also our mission to contribute to curbing such expenditure and other social costs.
Beyond merely easing the symptoms of disease, we seek to relieve patients and their families of mental stress and to provide patients with enjoyment and satisfaction in their lives, a sense of security, and opportunities to continue in, or reintegrate into, society. We believe that pursuing innovations in this way will help our society to prosper and the sustainability of our society.

3 “Creation of new drugs”

The process of creating a new drug is a long one. Against a backdrop of rapid progress in science and technology, we will not only further enhance our drug discovery capabilities but also proactively utilize partnering arrangements (open innovation and open shared business) to integrate the technologies and strengths of other entities and individuals with our own, thereby delivering new drugs to sufferers who are anxiously awaiting medicine as promptly as possible.
We will also pursue development of new types of pharmaceuticals (drugs of the future) by tapping into the distinctive resources of the Mitsubishi Chemical Holdings Group to incorporate various elemental technologies, materials, diagnostic agents, and devices. In addition to these technological assets, we will assimilate other technologies that promise substantial progress going forward, such as those for middle-molecule peptides, high molecular weight proteins, nucleic acids and cells, thereby seizing the opportunities presented by regenerative medicine and genetic therapies.

4 “Maximization of product/pipeline value”

The overall value of medicine is determined by taking into account such aspects as: pharmaceutical efficacy and safety; reliability; usability; and drug information, including information on dosage and administration. From the initial stages of research and development, we apply approaches based on medical science to maximize the clinical value of pharmaceuticals by understanding medical needs, conducting medical and pharmacological evaluation, and working to improve cost competitiveness.
In the later stages of drug development, we conduct clinical trials, giving consideration to each compound’s unique characteristics. After launch, we continue to monitor for adverse events and drug reactions and conduct clinical research to collect treatment and other information on drugs, thereby accumulating data on their efficacy and safety. Through such initiatives, we maximize the full potential of each type of medicine from an early stage.

5 “The art of drug development”

For a new compound to be launched as medicine, a broad range of research and development activity is required. With every single product, we strive to establish: robust and significant manufacturing technologies, including manufacturing processes, to efficiently produce drug substances with stable quality, drug ingredient mixtures, and formulation designs, to ensure that active ingredients are delivered to therapeutic targets in the body; highly productive manufacturing methods and technologies to scale up such manufacturing; packaging that helps to further enhance the quality of therapies; and appropriate quality evaluation. Our goal is to deliver high-efficiency, low-cost, and high-quality “medicine” to patients.
By combining these proven technologies with new materials, devices, IT, and other technologies, we also seek to develop medicine that offers greater convenience.

6 “Clinical research”

We properly undertake clinical research with regard to both ethical and scientific considerations by ensuring transparency and reliability, respecting the WMA Declaration of Helsinki (“Ethical Principles for Medical Research Involving Human Subjects”) and the ethical principles on which it is based, and complying with all relevant laws and regulations, government guidelines and trade norms.
We conduct only scientifically valid clinical research that offers justifiable value for prevention, diagnosis, or treatment of diseases, and we conduct it only when the importance of its aims outweighs any potential risks or inconvenience to the participants who voluntarily cooperate in such research. In conducting clinical research, we prioritize consideration of the human rights, safety and health of research participants and we take appropriate and valid measures to protect the privacy of such participants. We also adhere to these policies in clinical research conducted jointly with external partners such as medical and research institutions.

7 “Relationships with medical and research institutions”

In conducting drug discovery research jointly with external partners or in outsourcing or subsidizing such research, we consistently maintain fair relationships with our partners and refrain from any conduct that could give rise to concerns about the integrity and independence of their decision-making.
When we conduct joint research and provide research support, we pay due attention to management of conflicts of interest, recognizing that the independence of researchers is extremely important in ensuring objectivity and reliability.

2 SAFETY

We strive to minimize the possibility of health hazards resulting from adverse reactions by reducing the safety risks of our pharmaceuticals. In order for patients to be able to consult physicians for treatment using our pharmaceuticals with peace of mind, we collect and analyze treatment information worldwide on a daily basis during clinical trials and post-marketing surveys, whether the pharmaceuticals in question are in-house or co-developed. Our goal is to provide healthcare professionals with the timely and reliable feedback that they need to appropriately determine a balance between the benefits and risks of a particular pharmaceutical in the treatment of each and every patient.

3 QUALITY ASSURANCE

It is absolutely essential to assure the quality, efficacy, and safety of “medicine” throughout the product lifecycle, from research and development through manufacturing and post-marketing activities. In accordance with the applicable laws, regulations, and public standards of each country in which we operate, we establish and continuously improve systems for ensuring and monitoring compliance with GxP and other guidelines so that we can maintain and operate an effective quality management system that assures the reliability of data and the quality of our pharmaceuticals. We disclose reliable information in a timely and accurate manner.

4 SUPPLY CHAIN

In order to safely deliver to patients pharmaceuticals that both healthcare professionals and patients can use with peace of mind, we strive to assure product quality and reduce costs at every stage of our supply chain, while concurrently building a system for the stable supply of quality pharmaceuticals through constant efforts to develop technologies and improve the relevant systems. We also improve our preparedness to take prompt and appropriate action, even in the event of unforeseen circumstances, by reinforcing the functioning of our entire supply chain and facilitating cooperation among concerned parties.

5 PRODUCT AND MEDICAL INFORMATION

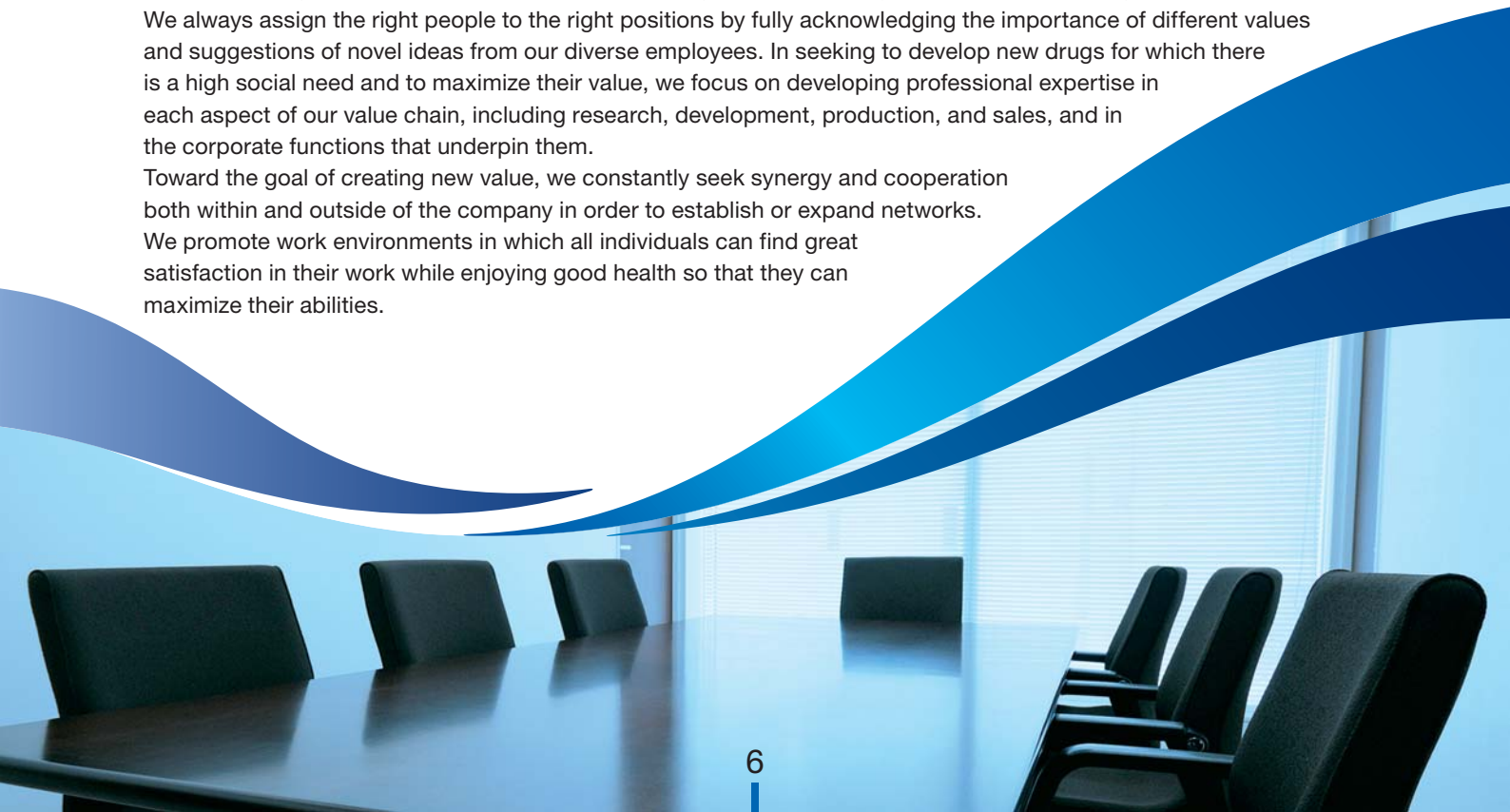
In every country where we market our pharmaceuticals, with pride and a sense of mission as an organization involved in the creation of “medicine” that has significant influence on people’s lives, in accordance with the applicable laws, regulations and trade norms, we provide information to ensure the proper use of our pharmaceuticals as well as important product information for patients and the medical fraternity. While monitoring healthcare conditions and ever-changing patient needs in each country and region, we utilize appropriate measures to provide, collect, and communicate pharmaceutical information, both accurately and in a timely manner. We also provide information as a part of our effort to contribute to regional healthcare in collaboration with healthcare professionals and governments.

6 MANAGEMENT AND UTILIZATION OF INTELLECTUAL PROPERTIES

We create, protect, and put to effective use our globally competitive intellectual properties related to pharmaceuticals, which serve as the basis for our development of innovative pharmaceuticals and proper provision of opportunities for patients to receive healthcare. We pursue intellectual property strategies, which are integrated with our management and research and development strategies in order to establish our rights in a timely manner. Mitsubishi Tanabe Pharma Corporation manages all intellectual property rights held by the Mitsubishi Tanabe Pharma Group in an integrated manner and advances their optimal utilization and protection in order to contribute to enhancement of our corporate value by protecting, licensing, and otherwise utilizing our own pharmaceuticals and business activities.

7 OUR EMPLOYEES

To create innovative new drugs it is vital that employees constantly take on challenges for advancement without fear of failure, and that the organization and corporate culture is geared toward utilizing such talented individuals.
With this in mind, we remain flexible in administering our organization so that we can closely connect management decisions with the challenges taken on by employees and produce good results through timely decision-making and actions.
We always assign the right people to the right positions by fully acknowledging the importance of different values and suggestions of novel ideas from our diverse employees. In seeking to develop new drugs for which there is a high social need and to maximize their value, we focus on developing professional expertise in each aspect of our value chain, including research, development, production, and sales, and in the corporate functions that underpin them.
Toward the goal of creating new value, we constantly seek synergy and cooperation both within and outside of the company in order to establish or expand networks.
We promote work environments in which all individuals can find great satisfaction in their work while enjoying good health so that they can maximize their abilities.



8 INFORMATION MANAGEMENT/SECURITY

Recognizing that information represents important management resources and assets, we systematically and efficiently manage and use our information assets according to their nature and significance. We have established and operate appropriate management systems and guidelines for maintenance and enhancement of information security effectiveness. We also implement systematic, personnel-related, physical, and technical safety management measures to ensure information security.

9 DISCLOSURE

We disclose information on our business activities that is reliable and useful for societies and stakeholders in a timely and appropriate manner. When disclosing such information we do so accurately, promptly, proactively and with integrity, taking due care not to infringe copyrights, privacy or other rights, so that every stakeholder can be given fair access to the information disclosed.
We also disclose information on our clinical trials in a timely and appropriate manner and in accordance with the laws, regulations, guidelines and trade norms in each country and region.

10 ENVIRONMENT AND SAFETY

In conformity with the overriding principle that safety is paramount, we strive to prevent disasters occurring at workplaces and to implement adequate precautions and preparations against all contingencies, including occupational accidents and disasters.
We also take continuing steps to reduce the impact of our corporate activities on the natural environment and we are fully committed to community environmental conservation activities.

11 RESPECT FOR HUMAN RIGHTS

We support the protection of human rights. We also support the elimination of any and all forms of forced labor and the abolition of child labor.
We promote creation of healthy workplace environments in which everyone respects each other's personality and human rights, feels free to speak openly about any matter and maintains good personal relationships. Furthermore, we do not tolerate any act that could infringe fundamental human rights or devalue individual abilities, including cases of discrimination and forms of harassment.
We at the Mitsubishi Tanabe Pharma Group shall not treat our employees in a discriminatory manner on the basis of ethnicity, gender, religion, or other grounds.

12 ASSURANCE OF FAIR BUSINESS

We always pay attention to any discrepancies between social norms and the company's positions and never engage in any conduct that would go against such norms.
Whilst strengthening corporate governance and promoting compliance, we check our internal control systems as necessary and make any necessary improvements to increase their effectiveness in order to prevent risks from arising.
In strict observance of the competition laws and other relevant regulations in each country, we engage in fair and free competition in the marketplace. We do not abuse our position in business transactions in order to impose unreasonable requests, rather, we build relationships of mutual trust through fair transactions. We maintain sound and proper relationships in transactions associated with business activities on the basis of accurate understanding of anti-corruption and bribery laws and regulations.
We put the capital, goods and other assets of the company to efficient and proper use in order to achieve efficient business management. We are committed to maintaining sound and proper relationships with political bodies and government agencies.
We use cell-based experiments and other methods as efficiently as possible and keep any animal-based testing to a bare minimum.

13 RESPONSIBILITIES AS A CORPORATE CITIZEN

In order to fulfill our social responsibilities as a good corporate citizen, we respect the cultures and customs of the countries and regions in which we operate, conduct our business activities giving due consideration to such cultures and customs and promote worthy social contribution activities. We also provide individual employees with workplace environments that make it easy for them to independently participate in volunteer activities.

(End)

Response to non-compliance

The Mitsubishi Tanabe Pharma Group defines “compliance” as “behavior that conforms to laws and regulations, in-house rules, and social norms,” and we are expected to meet an ever-expanding range of demands from society in this regard.
In the event that any suspicions or problems concerning compliance are raised in relation to our corporate behavior, our employees consult with and report to their supervisors or compliance/legal affairs departments. Requests for consultation and reports from employees are taken seriously and responded to in accordance with the policies below, and investigations are conducted without delay. Each Group company has established a hotline to assist in cases where consultation or reporting may be difficult.

[Policies on responses to consulting and reporting from employees]

- Cases that have been consulted about or reported shall be responded to with fairness and integrity, and all personal information shall be kept strictly confidential.
- No one shall be treated unfairly on account of issues that have been correctly consulted about or reported.
- No one shall be allowed to retaliate against any individual who has engaged in such consultation, submitted a report, or cooperated in an investigation.

Established as of July 1, 2017

Mitsubishi Tanabe Pharma