Policy Title:	**Anti-Bribery and Anti-Corruption Policy**
Policy Number:	LEG-POL-019

1. PURPOSE

Daiichi Sankyo, Inc. (the "Company") strives to maintain the highest possible ethical standards. The purpose of this anti-corruption policy (the "Policy") is to help ensure compliance by the Company with global anti-bribery and anti-corruption ("ABAC") rules and principles (including the Foreign Corrupt Practices Act of 1977, as it may be amended from time to time (the "FCPA")) and to avoid even the appearance of questionable conduct in connection with the Company's operations. This Policy should be read in conjunction with the Daiichi Sankyo Group *Global Anti-Bribery & Anti-Corruption Policy*, the Company's *U.S. Standards of Business Conduct*, and other general management policies.

The FCPA prohibits Payment of Bribes and other illegal payments, whether directly or indirectly, to officials of a non-U.S. government, public international organization, non-U.S. political party or candidate for political office in order to obtain or retain business or to secure any improper advantage. Payment is defined broadly to include an offer, payment, promise to pay, or authorization of payment of any money, or offer, gift, promise to give, or authorization of the giving of anything of value.

2. SCOPE

This Policy applies to all Employees and Contingent Workers of Daiichi Sankyo, Inc. ("DSI"). This includes DSI Employees and Contingent Workers within any DSI division(s) and/or within any of the global functions. Additionally, Employees or Contingent Workers employed by another corporate entity within the Daiichi Sankyo Group who perform, or who supervise, or manage those who perform the activities described in this Policy, are responsible to familiarize themselves with this document and ensure adherence to the stated requirements.

3. POLICY

a. Unlawful, Improper, or Unethical Activities

The use of the Company's funds, assets, or personnel for any unlawful, improper, or unethical purpose is strictly prohibited. The Company and its Employees and Contingent Workers are required to conduct the Company's business in compliance with all Applicable Laws and Industry Codes in the countries in which the Company does business. The Company and its Employees and Contingent Workers must avoid any activity that might involve the Company (either directly or indirectly) in any violation of this Policy or the FCPA.

b. Prohibited Payments

Unlawful Payments to Government Officials (Bribes). The Company is committed to complying with the FCPA. Employees and Contingent Workers are prohibited from directly or indirectly paying, giving, promising, gifting, authorizing, or offering money or anything of value to a Government Official on behalf of the Company to improperly induce the recipient to take (or to refrain from taking) action that would bestow a commercial benefit or advantage on the Company, or its Employees or Contingent Workers. This general rule applies in all circumstances except the limited situations referenced herein, each of which requires prior written approval from the Legal Affairs Department. For emergency situations (e.g., transport of drugs from the tarmac for refrigeration purposes), the prior approval process is waived. Documentation of such emergency situations must still occur within 24 hours to the Legal Affairs Department and per Company procedures.

Interactions with Private Parties. This Policy prohibits not only unlawful Payments (including Bribes) that occur in interactions with Government Officials, but also that occur in interactions with Private Parties.

Facilitation Payments. Facilitation Payments are prohibited under this Policy, even if otherwise permitted pursuant to Applicable Laws and Industry Codes.

Travel and Meal Expenses. The Company may pay for the reasonable cost of a Government Official's meals, lodging, or travel if, and only if, the expenses are directly related to the promotion, demonstration or exploration of Company products or services, or the execution of a contract with a non-U.S. government, or agency thereof. Such expenses must be legitimate and reasonable in light of routine business travel, and the Payment must not be an inducement to a Government Official to use his or her influence to improperly affect or influence any act or decision to obtain or retain business for the Company. Approval from the Legal Affairs Department is required before making or agreeing to make, any such Payments on behalf of Government Officials. Payments to Healthcare Professionals are also subject to the Company's *Vendor Arrangements Involving Interactions with Healthcare Professionals and Customers Policy* (LEG-POL-015), the *Fair Market Value – Healthcare Professional Compensation Policy* (LEG-POL-014), and the *Gifts, Educational Items, Meals and Entertainment Involving HCPs and Customers Policy* (COM-POL-003).

Customary Gifts. Customary gifts of minimal value may be given to Government Officials who are not Healthcare Professionals ("HCP"s) as a courtesy, as a token of regard or esteem, in recognition of services rendered properly, or to promote goodwill. Such gifts

must be small in amount in relation to local customs and should generally bear the Company's logo or trademark. Customary gifts or other items may not be given to influence any act or decision of a Government Official in his or her official capacity. See the Company's *Vendor Arrangements Involving Interactions with Healthcare Professionals and Customers Policy* (LEG-CIA-POL-015), the *Gifts, Educational Items, Meals and Entertainment Involving HCPs and Customers Policy* (COM-POL-003), and the *Employee Gift Policy* (COM-POL-019).

Third-Party Payments. Payments made by third parties on behalf of the Company are subject to the requirements of this Policy. If any Employee or Agent becomes aware that improper Payments have been made on the Company's behalf, contact the Legal Affairs Department. Employees and Contingent Workers are prohibited from directly or indirectly making a Payment to any third-party with Knowledge that such Payment will be given, promised or offered, directly or indirectly, in whole or in part, to a Government Official on behalf of Company and would induce the Government Official to use his or her influence to improperly affect or influence any act or decision. This prohibition shall apply in all circumstances except the limited situations set forth in Section 3.2.1.1- 3.2.1.4, each of which shall require prior written approval from the Legal Affairs Department.

Political Contributions. Employees and Contingent Workers are prohibited from making contributions on behalf of the Company, in cash or otherwise, to candidates for non-U.S. political office unless pre-approved in writing by the Legal Affairs Department. Any contribution on behalf of the Company to a U.S. candidate for political office must follow Company procedures.

c. Grants, Charitable Contributions, & Product Donations

Grant funding, charitable contributions, product donations, or other funding sources shall not be used as a means for making improper Payments. Employees and Contingent Workers must ensure that contributions and donations on behalf of the Company are given only to legitimate charities, and are used only for proper charitable purposes, and not otherwise misapplied in violation of this Policy, the FCPA, or local law. Written approval from the Legal Affairs Department shall be required prior to any charitable contributions being made to a non-U.S. charity on behalf of the Company. Any grants, charitable contributions, and product donations provided to a recipient on behalf of the Company must follow Company policies.

d. Gifts Received from Government Officials

Employees and Contingent Workers must not solicit or accept gifts from Government

Officials whether received directly or indirectly. If, under extraordinary circumstances (e.g., diplomatic protocol, ceremonial recognition), it is not practical for the Employee or Contingent Worker to decline or return a gift from a Government Official, the gift must be turned over promptly to the Company, regardless of its nature or value.

e. Cash Payments

Employees and Contingent Workers are prohibited from making cash or cash equivalents (such as gift certificates) Payments of any kind to a Government Official. Personal services must not be directly or indirectly provided or offered to HCPs or Government Officials. For these purposes, personal services are any type of service unrelated to the HCP's profession or Government Officials' duties and that confers a personal benefit to the HCP or Government Official. Company checks shall not be written to "cash," "bearer," or anyone other than the party entitled to payment.

f. Due Diligence

Any Employee who engages a Contingent Worker shall ensure that the Contingent Worker fully complies with this Policy, the FCPA, and local law. Under certain circumstances, this may require a due diligence review to determine the Contingent Worker's willingness and ability to comply with this Policy, the FCPA, and local law(s). For more information, refer to the Company's *Third-Party Due Diligence Policy* (COM-POL-026).

g. Employee Responsibilities

Every Employee of the Company is responsible for interacting with others and otherwise conducting him/herself consistent with this Policy. Supervisors and managers are also responsible for enforcing this Policy and for advising Contingent Workers they engage of this Policy.

h. Documentation/Records

Any Employee(s) and/or Contingent Worker(s) who facilitates transactions, payments, and/or expenses for gifts, meals, entertainment, and items of medical utility must prepare and maintain the documentation and records required under applicable Company policy(ies) and in accordance with the Company's Records Management Policy and related documents. Additionally, transactions, payments, expenses, meals, entertainment, and items of medical utility must be reported as required by applicable law,

codes and/or Company policies or procedures. Finally, the Company must also maintain adequate internal controls related to expenses, financial reporting, and fraud prevention.

4. TRAINING EXPECTATIONS

Training required: Training relating to this Policy is required for all Employees responsible for, or participating in, the business activities described herein. Training may be delivered in one or more of several formats, including, computer-based module, live, Microsoft Teams, etc., as determined by the owning department. The owning department is responsible for ensuring all applicable DSI Employees and Contingent Workers complete the required training. In situations where the owning department proposes to utilize the Learning Management System (LMS) as the vehicle for training DSI Employees and Contingent Workers who function in department(s) outside of the owning department, prior approval by the LMS Steering Committee is required.

5. ACTIVITY OWNER, KEY APPROVAL AND DOCUMENTATION

This Policy is owned by Legal & Corporate Affairs, which is responsible for future updates of this Policy. The Compliance Department is responsible for applicable training. Company personnel must maintain books and records to accurately reflect, in sufficient detail, the nature of company transactions. Further, the Company must maintain adequate internal controls related to expenses, financial reporting, and fraud prevention. Additionally, Compliance is required to maintain internal controls to prevent and detect potential violations of this Policy.

6. COMPLIANCE

Failure to follow this Policy may subject an Employee to disciplinary action, up to and including termination. The assignment of any Contingent Worker who fails to follow this Policy may be ended (and/or subject his/her vendor employer to termination of the applicable vendor contract). Any Employee or Contingent Worker who becomes aware of an actual or potential violation of this Policy or any other policy must promptly report it to his or her manager, and/or one of the following Daiichi Sankyo, Inc. departments: Compliance, Legal Affairs, Human Resources, or the Compliance Hotline at (877-48ALERT) or the Compliance Hotline website (dsi.alertline.com). The Company follows a policy of non-retaliation and no Employee, or Contingent Worker will be subject to retaliatory action for reporting in good faith a suspected violation of this Policy.

7. POLICY, REFERENCES, FORMS AND TEMPLATES

- Daiichi Sankyo, Inc.'s U.S. Standards of Business Conduct
- Gifts, Educational Items, Meals and Entertainment Involving HCPs and Customers – COM-POL-003
- Employee Gift Policy – COM-POL-019
- HCP Consultant Relationships and Services Agreements – COM-POL-007
- Financial Support to Professional and Patient Organizations, Medical Education Companies and Healthcare Institutions Policy: Grants, Sponsorships and Memberships – COM-POL-008
- Charitable Contributions and Product Donation Policy – COM-POL-009
- Third-Party Due Diligence Policy – COM-POL-026
- HCP Consultant & Customer Service Agreement AOP – LEG- AOP-009
- Fair Market Value – Healthcare Professional Compensation – LEG-POL-014
- Vendor Arrangements Involving Interactions with Healthcare Professionals and Customers – LEG-POL-015
- Records Management Policy - LEG-POL-025 and associated procedures and instruction documents
- Daiichi Sankyo Group Corporate Conduct Charter
- Daiichi Sankyo Group Employee Code of Conduct
- Daiichi Sankyo Group Global Anti-Bribery & Anti-Corruption Policy

8. ABBREVIATIONS AND DEFINITIONS

a. Abbreviations

Abbreviation	Term
DSPD	Daiichi Sankyo Pharma Development
FCPA	Foreign Corrupt Practices Act of 1977
HCP	Healthcare Professional
USOBD	U.S. Oncology Business Division

b. Terms

Term	Definition
Applicable Laws and Industry Codes	Any national, state or regional/local provisions of constitutions, statutes, rules, regulations and orders and industry codes applicable to Companies, Executives, Employees, Healthcare Professionals, Government Officials, and the location of the event/meeting.
Bribery/ Bribe	Providing, promising, or offering any money, Gifts, Entertainment or other advantages to Government Officials or Private Parties for the purpose of illicitly or illegally gaining or securing business advantages.
Company	Daiichi Sankyo, Inc.
Contingent Workers	All individuals who provide services to the Company subject to a contingency. Typically, the contingency is a temporary need for services for a limited period of time, a select service, or a specific result/outcome. Contingent Workers include agency temporary workers, independent contractors, consultants, vendors, contract workers and fellows.
Employee	An individual hired directly by the Company and paid through the Company payroll as an employee for an ongoing, indefinite period to perform work for the Company on a weekly schedule.
Foreign Corrupt Practices Act (FCPA)	A U.S. federal statute prohibiting U.S. companies (including their subsidiaries) and their respective Employees and Contingent Workers from giving, promising or offering anything of value, whether directly or indirectly, to any foreign Government Official with the intention of obtaining or retaining business or an improper business advantage.
Facilitation Payment	Payment of nominal amounts to ensure or speed the proper performance of a Government Official's routine or non-discretionary duties or actions.
Government	Any agency, instrumentality, subdivision or other body of any national, state or local government, including hospitals and other health facilities owned or operated by a government; regulatory agencies; and government-controlled businesses, corporations, and societies.
Government Official	Any officer, employee, or person acting on behalf of any national, state, regional or local Government, or any department, agency or instrumentality of the Government (including employees of Government-owned or controlled entities) and is broadly interpreted to include amongst others but not exclusively: • Any elected or appointed Government Official (e.g., a legislator or a member of a Government ministry); • Any employee or individual acting for or on behalf of a Government Official, agency, or enterprise performing a governmental function, or owned or controlled by, a Government; • Any political party officer, candidate for public office, officer, or employee or individual acting for or on behalf of a political party or candidate for public office;

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	• Any employee or individual acting for or on behalf of a public international organization; • Any member of a royal family or member of the military; • Any judge or referee; • Any HCP or researcher employed by, teach at, or has privileges at a Government hospital or public university; or • Any individual otherwise categorized as a Government Official under applicable local laws and regulations.
Healthcare Professional	Any member of the medical, dental, pharmacy or nursing professions or any other person who in the course of his or her professional activities may prescribe, recommend, purchase, supply, or administer a pharmaceutical product or recommend a pharmaceutical product for placement on a formulary, approved reimbursement list, or grant similar payment status.
Knowledge	The Company is considered to have knowledge of a violation or the FCPA if it is aware that: • an improper payment has been made; • the circumstances for an improper payment exist; or • the improper payment is substantially certain to be made; or It has a firm belief that: • the circumstances for an improper payment exist; or • the improper payment is substantially certain to occur
Payment	Any offer, payment, promise to pay, or authorization of payment of any money, or offer, gift, promise to give, or authorization of the giving of anything of value.
Private Parties	Any person or entity who is neither Government nor Government Officials.
Standards of Business Conduct	The Company's Standards of Business Conduct.