



hhc & Compliance

Compliance Handbook for
Eisai Network Companies

Compliance Handbook **9th edition**

Global | Compliance
Handbook

Eisai Network Companies

Compliance Handbook

Messages from Management

American English Version

October 2023



Message from the Chief Executive Officer

Corporate compliance incidents, also known as white-collar crimes, can have grave consequences for individuals and companies. On the one hand, in cases involving criminal intent, such as embezzlement of funds, the company would be required to claim compensation from the wrongdoer or pursue criminal proceedings. In all cases, the wrongdoer will have to leave the company. On the other hand, there are cases where a compliance violation is committed because the wrongdoer believes it is in the company's interest. One such example is cartels, whereby price fixing or production adjustments may falsely appear to improve profits temporarily. However, such incidents would lead to vast amount of fines that are overwhelmingly greater than any financial gains. Wrongdoers, both employees and directors, may face prison sentences. And it takes huge amounts of time and energy to resolve the problems created by the misconduct. It is wrong that such action might help the company. Compliance violations are never worth it.

Further, workplace cases such as harassment and discrimination cause enormous pain to those affected and significantly disrupt the organization and culture of the company.

Any manipulation or misrepresentation of data, information, or product quality poses a severe risk to the company. Such a transgression can shake the very foundations of a company, resulting in a loss of trust or the discontinuation of the company's business. It can even trigger the company's downfall or an unwanted merger.

You might get the sense that you can do something because no one else would find out; you might think it is okay because you see people around you doing the same; or you might feel it is permissible to some extent because it is within your discretion. But these kinds of thoughts are signs of something rotten in the person and the organization. There is no room whatsoever for such behavior in Eisai or for claims of extenuating circumstances.

I want to emphasize strongly to you all that compliance is not optional for Eisai. It is an absolute prerequisite for the trust placed in us by our valued patients and by all our stakeholders.

March 2021

Haruo Naito

Representative Corporate Officer and CEO

Haruo Naito



**Message from
the Chair Person
of Compliance
Committee**

The lifestyles and business styles of people around the world have changed dramatically. In particular, the number of face-to-face opportunities between people has decreased significantly, making it

difficult to communicate in both life and business. We must respond quickly to changes without being bound by conventional methods.

In this way, as business practices change, compliance remains the same. I have been advising on Eisai's compliance promotion for over 20 years since the establishment of the Compliance Committee in Eisai. Today, Eisai has a great compliance program and promotion structure in place. However, this is meaningless if each person is not conscious and compliant.

Eisai has created a globally common compliance handbook. This Handbook is a collection of important things that each and every one of you must protect, regardless of country or region. In addition, the content presented in this handbook is based on more than 20 years of Eisai's compliance history, and its essence will not change even after repeated revisions.

March 2021

D. Stuart Meiklejohn

Chair Person of Compliance Committee

Stuart Meiklejohn



**Message from the
Chief Compliance
Officer**

At the General Meeting of Shareholders held in June 2022, our Articles of Incorporation, which describe our fundamental company principles, were revised. With this revision to our articles of incorporation, we have included “empowering

people to realize their fullest life” in the areas of everyday activities and medical care, as well as the efficient pursuit of social good, in our corporate philosophy, which is built around our *hhc* philosophy. Social good here specifically refers to relieving people’s health-related concerns and rectifying disparities in the availability of medical care as a Japanese innovation company.

On July 7, 2023 (Japan time), LEQEMBI was granted full approval by the U.S. Food and Drug Administration (FDA). This is a true testament to our status as an innovation company, as set forth in our Articles of Incorporation. The full approval of LEQEMBI in the United States was widely covered by media around the world as a breakthrough in the treatment of Alzheimer’s disease. We have received many words of appreciation and hope from people living with Alzheimer’s disease, their families, medical professionals, and caregivers. We engage in our day-to-day work with pride as a pioneer in the field of Alzheimer’s treatment, where we are committed to meeting the expectations of society that grow larger by the day.

As part of this effort, I ask you to maintain awareness of how these expectations placed on us by society form the compliance standards at Eisai. If a company that professes to pursue social good is seen by society as engaging in unethical conduct, it will be denounced in the severest terms and its credibility in society will immediately crumble. I am determined to work together with all of you to realize our corporate philosophy without betraying the trust we have earned from society. With pride in your heart and your head held high, I ask you to engage in your day-to-day work while upholding the expectations of society.

September 2023

Kenta Takahashi

Chief Compliance Officer

Kenta Takahashi

