

## General Principles and Guidelines on Handling Conflicts of Interest

A Conflict of Interest may arise in any situation in which an employee's loyalties are divided between business interests that, to some degree, are or may be incompatible with the interests of the Daiichi Sankyo.

Conflicts of interest can have broad classifications: actual conflicts of interest (the employee faces a real, existing conflict); potential conflicts of interest (the employee is in or could be in a situation that may result in a conflict); and perceived conflicts of interest (the employee is in or could be in a situation that may appear to be a conflict, even if this is not the case).

Daiichi Sankyo requires all service suppliers to declare any Conflict of Interest before signing any contract for services.

Making judgements, taking decisions, or pursuing actions when facing a Conflict of Interest may make it difficult to perform work for Daiichi Sankyo objectively and effectively and this may have undesired consequences.

Private interests and the interests of Daiichi Sankyo must at all times be strictly kept apart. Employees of Service Providers should not place themselves in situations that might force them to choose between their own personal and/or financial interest and the interest of the Daiichi Sankyo.

In business relevant cases of Conflict of Interest, the interest of the Daiichi Sankyo has priority. In all business contacts with existing or prospective customers, suppliers, as well as competitors, employees must always act in the best interest of the Daiichi Sankyo and to the exclusion of any personal advantages.

Service Provider employees will not demand personal benefits from Daiichi Sankyo business partners (money, goods, entertainment or other) based on their employment status or the influence they have.

The following are some example questions to help you assess when you are faced with a situation in which you think you might have an actual, perceived or potential conflict of interest that should be discussed and eventually reported:

- Is a relative or significant other working for the Daiichi Sankyo?
- Would anyone associated with you benefit from or be detrimentally affected by the proposed decision or action?
- Could there be benefits for you in the future that could cast doubt on your objectivity?
- Would your reputation or that of a relative, friend or associate stand to be enhanced or damaged because of the proposed decision or action?
- Do you or a relative, friend or associate of theirs stand to gain or lose financially in some covert or unexpected way?
- Do you hold any personal or professional views or biases that may lead others to reasonably conclude that you are not an appropriate person to deal with the matter?
- Have you contributed in a private capacity in any way to the matter your Daiichi Sankyo is dealing with?
- Have you made any promises or commitments in relation to the matter?
- Have you received a benefit or hospitality from someone who stands to gain or lose from your proposed decision or action?

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- Are you a member of an association, club or professional organisation or do you have particular ties and affiliations with organisations or individuals who stand to gain or lose by your proposed decision or action?
- Could there be any other benefits or factors that could cast doubts on your objectivity?
- Describe the matter or issue being considered and the situation in which you are involved and declare this to your Daiichi Sankyo contact.

Reference is made to the Daiichi Sankyo Corporate Conduct Charter in its current version, which is contemplated by these guidelines.