

Shionogi Europe Code of Conduct

Succeeding
Together

1. Be mindful

- 6 Why we have a Code
- 6 Who must follow our Code?
- 7 We comply with applicable laws, regulations and industry codes
- 7 We will take steps to address breaches
- 7 We have a “No Retaliation” policy
- 7 We Speak Up
- 8 Our Code reflects our Heritage, Vision, Values and WOWs
- 9 How to make good decisions
- 10 Where to get further information

2. Put patients first

- 13 We comply with healthcare laws, regulations and industry codes
- 13 We are committed to patient safety
- 13 We report issues regarding Shionogi products
- 14 We conduct research responsibly
- 14 We share anonymised research data to advance science and public health
- 14 We are committed to data transparency

3. Demonstrate accountability

- 17 We avoid conflicts of interest
- 18 We show integrity when interacting with healthcare providers
- 18 We comply with transparency requirements
- 18 We respect the relationship between a patient and their physician
- 19 We communicate responsibly
- 19 We use social media appropriately

4. Deal fairly with others

- 23 We compete fairly and follow competition laws
- 24 We do not tolerate bribery or corruption
- 24 We seek to prevent money laundering
- 24 We comply with insider trading laws
- 25 We comply with public procurement rules
- 25 We comply with sanctions and export and import laws
- 25 We follow data privacy laws

5. Protect our company assets

- 28 We protect our intellectual property
- 28 We protect confidential information
- 29 We protect physical assets
- 30 We keep complete, accurate, relevant records

6. Celebrate our diversity and care for each other

- 33 We build greatness out of diversity and use our collective strength
- 33 We promote equal opportunity
- 33 We are caring and respectful
- 34 We keep our workplace safe and healthy
- 34 We are prepared for an emergency or crisis
- 34 We do not tolerate forced labour or slavery
- 34 We support human rights

7. Care for our communities and environment

- 37 Help us preserve the environment
- 37 We support our communities
- 37 Our work with government and non-government organisations is ethical
- 37 We do not make political contributions

Thank you for your commitment to our Code

- 38 Thank you for your continued commitment to succeeding together





Huw Tippet
CEO, Shionogi Europe

Dear Colleagues

Since Shionogi was founded in 1878, we have been striving to supply the best possible medicines to protect the health and wellbeing of the patients we serve. We are proud to have developed breakthrough treatments that address unmet clinical needs and major global public health concerns.

Shionogi is already recognised globally and trusted by patients, their families, healthcare providers and society. However we are now evolving as an organisation and transforming ourselves into a healthcare provider that aims to continuously offer new value to society using our advanced scientific know-how, talented people and passion.

We believe that how we achieve our goals is as important as the goals themselves. Developing life-changing medicines for patients is a big responsibility and it is crucial we hold ourselves to the highest standards.

Shionogi Europe's Ways of Working (WOWs) have been woven into our fabric since our launch in 2012 and it is through our WOWs that we bring the Shionogi family's global values to life. Our WOWs and values are at the heart of everything we do. They shape our culture, inform this Code of Conduct and guide our decision making so that Shionogi can achieve our global vision of "building innovation platforms to shape the future of healthcare".

Our Code of Conduct underpins the standards and expectations for the way we do business in Shionogi Europe. Each of us has a responsibility to understand the Code and follow it so that our words, decisions and actions always reflect the right behaviours. By adhering to this Code of Conduct we will continue to build upon firm foundations for continued success in the future. Most important of all, we will continue to build on the trust that Shionogi has earned over so many years and keep Shionogi the kind of company that we are all proud to work for.

Thank you for your continued commitment to succeeding together.

Best regards,

H. Tippet





We succeed
together when
we make decisions the
right way, live our values,
preserve our reputation
and do the
right thing.

1. Be Mindful

2. Put patients first

3. Demonstrate
accountability

4. Deal fairly
with others

5. Protect our
company assets

6. Celebrate our
diversity and care
for each other

7. Care for our
communities
and environment



1. Be Mindful



1. Be mindful

Why we have a Code

All of us must be mindful of the fact that the decisions we make every day, in every place where Shionogi Europe operates, have an impact on the patients we serve, our industry, our communities and our global environment. We operate in a highly regulated and increasingly complex environment and sometimes you may find that the right decision is not obvious. This is where the Shionogi Europe Code of Conduct can help.

Our Code is intended to guide you towards making decisions the right way, living our values, preserving our reputation and doing the right thing. Our Code is not intended to explain everything about the legal and regulatory framework within which Shionogi Europe operates, nor tell you what to do in every situation you may encounter at work.

Our Code will help you understand:

- What Shionogi Europe expects from you.
- How to make good decisions.
- The key risks and aspects of the legal and regulatory landscape in which Shionogi Europe operates and importance of complying with our Code, our policies and procedures and the law.
- How to Speak Up about concerning behaviour that may lead to a breach of our Code, our policies and procedures and/or the law.
- Where to go for additional assistance and further information.

Who must follow our Code?

All employees and contractors working for or on behalf of Shionogi Europe and/or its European affiliates are required to comply with our Code, our policies and procedures, and the law.

It is the responsibility of each one of you to understand and follow our Code – Shionogi's reputation and success depends on it. We view each one of you as a leader, regardless of your job title. By following our Code, you will serve as a positive role model for your colleagues, business partners, healthcare professionals and those who see you in action every day.

If you have a management role, you have the additional responsibility of ensuring those you supervise understand the Code, have completed all required training, and of providing support and advice to ensure their decisions align with the Code.

We also expect our suppliers, business partners and other third parties conducting business on our behalf to meet the high standards that we set for ourselves. They must act in ways consistent with the spirit of the Code and comply with all applicable laws.



Nen, the Kanji (Japanese ideogram) for mindfulness, is comprised of two elements. The upper character, ima, the roof-like peak signifies this present moment, the 'now'. The symbol beneath is shin, translated as 'mind'.

We comply with applicable laws, regulations and industry codes

Our Code will help us to conduct business in an ethical and transparent manner and comply with all applicable laws, regulations and industry codes that apply to our company. If you are unsure about the impact of different countries' laws on your local activities, please check with a member of the SEU Legal Team. If you become aware of a conflict between local laws and regulations and this Code, or between local Shionogi policies and procedures and this Code, the more stringent standard should be applied.

We will take steps to address breaches

If Shionogi Europe becomes aware of a breach of our Code, our policies and procedures and/or the law, we will take steps to address the issue and prevent future breaches.

Depending on the circumstances, the corrective and preventative steps may include specific training or (in severe cases) disciplinary actions up to and including termination of your employment or engagement with Shionogi Europe.

We have a “No Retaliation” policy

At Shionogi Europe, we promote an open communications environment where you can Speak Up about your concerns without fear of retaliation. We will investigate all claims. If you are found to have retaliated against someone who has reported an issue in good faith or co-operated in an investigation you may be disciplined, up to and including termination of your employment or engagement with Shionogi Europe.

We Speak Up

It is your responsibility to Speak Up if you have concerns about behaviours that you suspect do not comply with this Code, Shionogi Europe's policies and procedures, applicable laws, regulations and/or industry codes of practice. It is not always easy to Speak Up, but it is the right thing to do and you are encouraged to do so knowing we have a “no retaliation” policy and that you have the full support of the Shionogi Europe management team. By Speaking Up, you will enable Shionogi to promptly investigate and resolve any issues before they become significant.

Often you might be able to correct the behavior yourself by saying a simple “please don't do that” to the person involved. If that doesn't work, you should raise your concern through one of these Speak Up channels:



Your line manager



**SEU People Team
or SEU Legal Team**



Our Speak Up service online or by phone

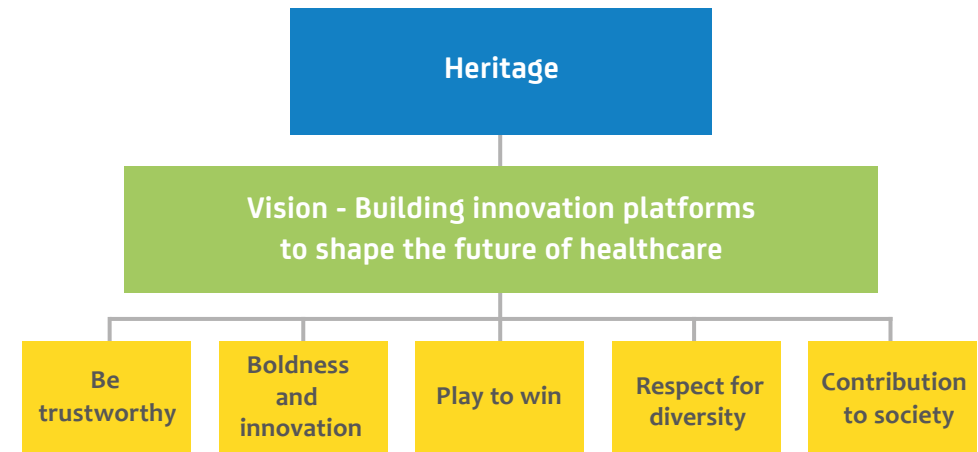
To raise a concern online, please visit www.shionogieuropa.ethicspoint.com and submit the form. This website also contains details of our country-specific Speak Up phone line, which is operated by a third party.



For more information see the [SEU Speak Up Policy](#)

Our Code reflects our Heritage, Vision, Values and Ways of Working (WOWs)

Shionogi Europe's Ways of Working (WOWs) have been woven into the fabric of Shionogi Europe since we launched in 2012. It is through our WOWs that we bring Shionogi's global values to life. Our WOWs and values shape our culture, inform this Code, and guide our decision making so that Shionogi can achieve our global vision of "building innovation platforms to shape the future of healthcare".



Shionogi Europe's Ways of Working



Shionogi's Global Values

- 1. Be Trustworthy** – We pursue honesty, accuracy, fairness and transparency to uphold society's trust in us.
- 2. Boldness and Innovation** – We are forward-looking, flexible, innovative and embrace change.
- 3. Play to Win** – We aim high, remain competitive, strive to achieve our goals and never give up.
- 4. Respect for Diversity** – We celebrate our diverse backgrounds and appreciate our different perspectives. We are inclusive and treat everyone equally and with respect.
- 5. Contribution to Society** – We aspire to help people lead longer, healthier lives, support our communities and sustain the global environment.

How to make good decisions

Our Code cannot tell you what to do in every situation.

In most situations where you are faced with a decision at work, if you comply with Shionogi Europe's policies and procedures and consider the questions outlined to the right, then your decision will probably be the right one. Always exercise good judgment and act with integrity.

If you are unsure whether your decision is the right one, speak to your line manager or a member of the SEU Legal Team **before** taking further action.

When faced with a decision, ask yourself...



Does it comply with applicable laws, regulations, industry codes and Shionogi's policies and procedures?



Does it align with Shionogi's values, WOWs and this Code?



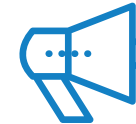
Does it support Shionogi's performance and goals?



Will it appear ethical to those outside the Shionogi family?



Will it reflect positively on Shionogi's reputation and credibility?



Would I be comfortable if it was made public?



Have I taken steps to assess, address, monitor and manage the risks involved?



Would it ensure Shionogi maintains the trust of all our stakeholders, including patients?

YES

Do it.

Your decision is likely to be the right one.

NO

Don't do it.

Discuss with your line manager or member of SEU Legal Team.

UNSURE

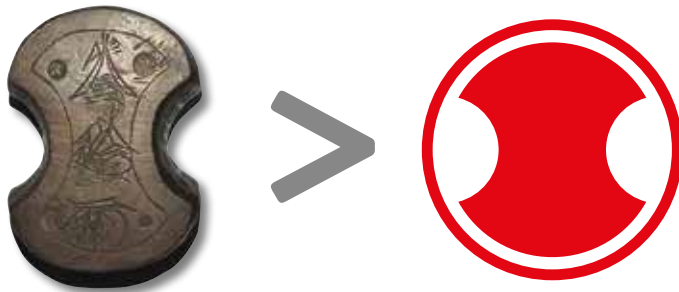
Don't do it.

Discuss with your line manager or member of SEU Legal Team.



Our Logo

Shionogi's logo originated from a fundoh, which is a traditional device used for measuring medicine weight. The fundoh represents accuracy, reliability and trustworthiness, and our logo reflects the trust that has been placed in Shionogi over the years by patients, their families, healthcare providers and society.



Where to get further information

Our Code is not intended to tell you what to do in every situation you may encounter working for or on behalf of Shionogi Europe. If you have questions about this Code, if the right decision is unclear, or if you need further advice and guidance, please discuss with your line manager or the SEU Legal Team.

Please also take advantage of the range of resources and expertise that exist within Shionogi Europe to provide further advice and guidance, including our policies and procedures and training on STREAM.



We succeed
together when
we develop and supply
innovative, safe and
effective new products
for the benefit
of patients

1. Be Mindful

2. Put patients first

3. Demonstrate
accountability

4. Deal fairly
with others

5. Protect our
company assets

6. Celebrate our
diversity and care
for each other

7. Care for our
communities
and environment



2. Put patients first



2. Put patients first

Developing innovative new medicines, vaccines and products to improve the lives of patients is at the heart of everything we do. Regardless of your role, your work affects patients and we gain their trust when we focus on their needs and put their safety first. This is why we expect you to keep patients in the forefront of your mind when you make decisions and conduct your work for Shionogi Europe.

We comply with healthcare laws, regulations and industry codes

To protect and ensure the safety of patients, governments around the world have implemented laws, regulations and industry codes which govern the operations of the pharmaceutical industry. These cover the research, development, approval, manufacturing, marketing, promotion and distribution of pharmaceutical products as well as govern our interactions with patients and patient organisations, healthcare professionals, researchers, customers, purchasers, government and non-government organisations, and others. Shionogi Europe is committed to complying with these healthcare laws, regulations and industry codes in every country where we do business.

We are also committed to providing accurate, balanced and timely information to help healthcare professionals select the most appropriate treatments for patients and help patients, their caregivers and patient organisations better understand the treatments on offer.

We are committed to patient safety

Shionogi strives to ensure the safety, quality and efficacy of our products by making sure our procedures comply with all applicable laws, regulations and industry guidelines. Our regulated procedures are documented in our quality management system which encompasses all regulated activities performed by or on behalf of Shionogi Europe.

Putting patient safety first means that we use a range of quality and safety guidelines and standards throughout our business. We also take care to ensure our records are correct and complete and we validate our computerised systems which support these regulated processes. This means each element of the process is traceable and ready for inspection.

We communicate openly and honestly with healthcare professionals, patients, institutions and public health agencies to ensure they have the information they need to use our products safely and effectively.

We report issues regarding Shionogi products:

If you hear of any potential issue regarding a Shionogi product (including adverse events and other safety information or product quality defects), you must report it in line with current approved Shionogi Europe timeframes and procedures using the details below. We follow up on complaints received in a timely manner and take appropriate corrective actions.



+44 (0)20 3053 4190
contact@shionogi.eu



+39 06 94 805 118
contattaci@shionogi.eu



+49 (0)30 2062980-66
kontakt@shionogi.eu



+34 911 239 258
contacta@shionogi.eu

We conduct research responsibly

Innovation drives our business and advances science. We discover and develop innovative new medicines, vaccines and products through clinical studies and we take care to protect the rights, safety and wellbeing of those who volunteer to participate in our studies.

All our research activities follow research protocols and adhere to stringent ethical, medical and scientific standards. We are committed to a global consensus set of ethical principles derived from international guidelines, including the World Medical Association's Declaration of Helsinki; the Council for International Organizations of Medical Sciences International Ethical Guidelines; International Council for Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH), Good Clinical Practice (GCP) and applicable laws and regulations.

We share anonymised research data to advance science and public health

Where possible, we share anonymised research data with qualified researchers so they can use it to advance science and public health. This maximises the value of our research data and the valuable contribution of research participants. The data sharing requests we receive are subject to formal approval processes and safeguards are put in place to control access and protect the privacy and confidentiality of research participants.

We are committed to data transparency

Shionogi Europe makes information about our clinical studies and results summaries publicly available on clinical trial registries and databases in accordance with applicable laws, regulations and industry standards.



How do we conduct our research?

- Robust operating policies and procedures guide us.
- Independent ethics committees review our clinical studies.
- Competent authorities are notified of, review, and approve our clinical studies as appropriate according to local country requirements.
- Investigators are qualified, objective and transparent.
- We treat participants with respect.
- We communicate honestly about our research, including the risks and benefits, so participants can make fully informed decisions about their participation and their informed consent is obtained before commencing.
- Study results are accurately and timely reported and published in accordance with law, regulations and accepted industry practice.
- We disclose financial relationships with investigators when research is done on our behalf.



We succeed
together when
we demonstrate
accountability,
act with integrity
and do the
right thing.

3. Demonstrate accountability



3. Demonstrate accountability

We avoid conflicts of interest

We must all act in the best interests of Shionogi Europe and the patients we serve and take care to separate these interests from our own personal interests. Conflicts of interest arise when we have personal relationships or interests that could, or could appear to, adversely influence our decision-making.

We need to carefully consider any situation that could be seen as not being fair and impartial. Perceived conflicts of interest could be just as damaging to Shionogi's reputation and the reputation of the individual involved as real conflicts.

When selecting third parties, we use fair and objective criteria such as price, quality, reliability, and ability to meet technical standards. Similarly, we make decisions with regard to employees based on factors such as their competencies, job performance and behaviour in the work environment.

When faced with an actual or potential conflict of interest, you are expected to disclose the situation to your line manager to find an appropriate solution.

Relationships and activities to disclose

By way of example, you should speak with your line manager if you:

- Have family ties or a close personal relationship with an individual:
 - (a) who wants to do business with Shionogi;
 - (b) who Shionogi is considering engaging (including, for example, a supplier, contractor, business partner or healthcare professional);
 - (c) who works for a government body involved in the drug reimbursement process;
 - (d) who wants to work for Shionogi; or
 - (e) working with a product that directly competes with a Shionogi product.
- Wish to engage in outside employment or consulting work, especially if it involves a competitor or business partner of Shionogi.
- Hold a financial interest in a company that Shionogi is considering doing business with or considering a merger or acquisition, especially if that company is a competitor or business partner of Shionogi.

In most cases your line manager should be able to work with you to resolve the conflict quickly and fairly.

Remember that any reporting relationship that could compromise your ability to be objective is also a conflict of interest. As a general rule, we should not report to or manage (directly or indirectly) someone who is a family member, romantic partner or close personal friend. Please speak to the SEU People Team to discuss any such conflicts.



For more information on conflicts of interest, see the [SEU Conflicts of Interest Policy](#).

We show integrity when interacting with healthcare providers

When interacting with healthcare professionals and healthcare organisations, we act with honesty, fairness and integrity so that our products are prescribed appropriately.

To serve the best interests of patients, the product information we provide to healthcare providers and those who use our products, wherever they are in the world, is complete, accurate, relevant and evidence-based.

When we engage a healthcare provider, we ensure that there is a legitimate business need and that the engagement reflects the requirements of industry codes and applicable laws.

We do not give gifts or other items or transfers of value as a way of influencing a healthcare provider's purchasing and prescribing practices.

Our promotional activities and materials are compliant and are approved in accordance with our Standard Operating Procedures (SOPs) and applicable industry codes to ensure they conform to the highest ethical, legal, medical and scientific standards.

We take steps to ensure our scientific engagement is distinct from the promotion of our products.



We comply with transparency requirements

Our commitment to transparency means that we keep accurate records of all transfers of values made to healthcare professionals and healthcare organisations and we publicly disclose these in accordance with applicable laws, regulations and industry codes.

We follow all laws and regulations that govern our pricing policies, including how we may provide discounts and rebates.

We respect the relationship between a patient and their physician

It is an honour to be able to develop and provide products that help patients live longer, healthier lives. All our interactions with patients, their caregivers and patient organisations must be open and transparent and only occur as permitted by the relevant industry codes and applicable laws.



We communicate responsibly

The way we communicate externally and internally is crucial to building our reputation and maintaining strong relationships. All communications about Shionogi Europe's business interests should be accurate, consistent, timely, reflect our global values and Shionogi Europe's Ways of Working, as well as follow our policies, approval procedures, applicable laws, regulations and industry codes of practice.

We do not promote our unlicensed medicines or licensed prescription only medicines to the general public. In Europe, the definition of "Promotion" is very broad and considered to be any activity which promotes the administration, consumption, prescription, purchase, recommendation, sale, supply or use of its medicines.

All of us must always pause to think about whether a proposed communication, whether face-to-face or digital, may be promotional. Promotional material must be approved in accordance with our Standard Operating Procedures (SOPs). For more information, please speak to your Affiliate Medical Director.

If you are contacted for comments about Shionogi Europe for publication, please direct the enquiry to the SEU People Team who will arrange for an appropriate representative from Shionogi Europe to respond.



We use social media appropriately

Social media provides Shionogi with unique opportunities to connect with our key audiences and share timely information about serious health challenges, our news and activities, our priorities, our performance and our people.

Given the highly regulated nature of the pharmaceutical industry, you must approach the online world in the same way as you approach in-person interactions – by using good judgment and common sense.

Your social media activity must at all times comply with:

- All applicable laws, regulations and industry codes of practice (including the rules relating to the promotion of medicines)
- This Code of Conduct, Shionogi Europe's policies and SOPs
- Our requirements and expectations for conduct when using social media set out in the SEU Social Media Policy.

At all times when you use social media, including in your personal time and using your personal accounts, you must comply with the following rule: **You must not post, like, share or comment on any social media content that refers to Shionogi or Shionogi's interests. Read Don't React.**

This is because social media platforms are accessible by the general public and your social media activity must not promote an unlicensed medicine or a prescription only medicine to the general public. Only certain "Authorised Staff" will be given written authorisation to use social media for Shionogi business purposes and to post, like, share and comment on content referring to Shionogi and/or Shionogi interests.



For more information see the [SEU Social Media Policy](#).

Other key points from our social media policy

- The SEU Social Media Policy applies when you use social media for your own personal purposes (including outside of working hours) and on your own personal IT equipment, as well as when you use social media for Shionogi business purposes.
- If you accidentally post, like, share or comment on something on social media in error, before deleting the action, first take a screenshot as evidence for Shionogi's records. Then act quickly to correct it using your common sense and report it in accordance with the SEU Social Media Policy.
- Your social media profiles must comply with the SEU Social Media Policy, including the applicable industry code of practice.
- Do not share or discuss Shionogi Europe's commercially sensitive information.
- Help Shionogi monitor social media content and report any disparaging or defamatory comments about Shionogi Europe, our staff or our interests to your Line Manager or member of the SEU Legal Team. Do not react to comments yourself.
- All content you post to social media on your personal accounts must be appropriate and respectful of all individuals, races, religions and cultures.
- Unless you are Authorised Staff, your use of social media must be on your own personal IT equipment. All business use of social media must be on Shionogi Europe's IT equipment.
- Report breaches of the SEU Social Media Policy to the Affiliate Medical Director and/or Shionogi Europe Regional Medical Director and the Shionogi Europe General Counsel (and cc'd to the VP Medical Affairs and VP Digital Innovation).



For more information see the [SEU Social Media Policy](#).



We succeed
together when we
deal fairly with others
and live our values and
Ways of Working
(WOWs).

1. Be Mindful

2. Put patients first

3. Demonstrate
accountability

4. Deal fairly
with others

5. Protect our
company assets

6. Celebrate our
diversity and care
for each other

7. Care for our
communities
and environment



4. Deal Fairly with Others



4. Deal fairly with others

We compete fairly and follow competition laws

Our interactions with competitors must comply with law. This is why we do not do the following:

- Enter into any understanding or agreement with competitors with the intention of restricting or limiting competition.
- Enter into agreements with competitors to fix prices or terms of sale, allocate markets or customers, restrict production or influence the outcome of a bidding process.
- Be a part of, or give the appearance of being part of, a conspiracy or cartel.
- Exchange or discuss sensitive business information with our competitors. This includes pricing, sales volumes, production capacities, costs or margins, customer information, marketing and sales strategies, research and development efforts and similar information. If you think that sensitive information should be shared, discuss this with a member of the SEU Legal Team first.
- Where Shionogi has a dominant market position in respect of a particular product, we do not abuse or exploit our economic strength to eliminate competition, prevent new competition from entering the market or manipulate prices. For example, we do not intentionally sell products below cost price, or refuse to sell customers one product unless they agree to buy another product from us.



Competition laws are complex and vary across the world, so it is important that we understand how these laws apply to our roles and seek guidance when we need it. Shionogi could face serious fines, litigation, loss of business and damage to our reputation if we fail to follow the rules.



For more information see the [SEU Competition Law Compliance Policy](#)

We do not tolerate bribery or corruption

Shionogi takes a strong stance against bribery which is consistent with the anti-bribery laws that exist in many countries around the world. We strictly prohibit the offering, giving or accepting of bribes, kickbacks, illegal payments or anything else of value to inappropriately influence a business decision or gain an unfair business advantage, whether provided directly or through a third party acting on our behalf.

The nature of our business requires us to enter into a range of educational, scientific, sales, promotional and marketing arrangements with public and private entities and individuals, including healthcare professionals. We also interact with inspection authorities and government authorities and regulators, including when we apply for pricing and reimbursement. It is crucial that our conduct follows the SEU Anti-Bribery and Corruption Policy, all applicable laws, industry codes and ethical standards prohibiting bribery and corruption.

Bribery is illegal no matter where in the world we work. Bribery or failing to prevent bribery can result in severe reputational damage, significant fines, imprisonment for those involved and exclusion from public contracts. There may also be severe repercussions for the individual(s) involved. We therefore take our legal responsibilities very seriously and ask that each of you do the same.

If you are unsure whether it is appropriate to offer or accept anything of value, please speak to a member of the SEU Legal Team.



For more information see the [SEU Anti-Bribery and Corruption Policy](#)



We seek to prevent money laundering

Money laundering is a process where funds generated through criminal activity, such as human trafficking, fraud, tax evasion, terrorism, and drug dealing, are moved through a legitimate business to hide their criminal origin. We are committed to conducting business in a way that prevents the abuse of our business transactions and processes and we comply with anti-money laundering, financial crime, and anti-terrorism laws in all countries where we operate.

We comply with insider trading laws

“Inside” or “non-public” information is information you obtain in the course of working for Shionogi, which has not been made public but which, if known, may persuade a reasonable investor to buy, sell or hold a company’s securities. You must never use such information, whether about Shionogi or another company, to conduct a trade or ‘tip’ someone else off so they may trade. Insider trading and tipping are illegal.

Speak to the SEU Legal Team if you are considering a transaction and are unsure whether it may constitute insider trading.



We comply with public procurement rules

Our products are purchased by public authorities who are subject to local laws and regulations governing how they procure products and services.

Shionogi staff who are involved in public procurement tender processes, or who offer to provide our products under a contract with a public authority, must understand and follow applicable public procurement rules. These rules can be complex and it is important you seek advice from the SEU Legal Team.

We comply with sanctions and export and import laws

We comply with all applicable laws, regulations, sanctions and restrictions that regulate how we import and export our products, services, information, and technology. Make sure you know how these apply in the countries in which the Shionogi business you support operates and speak to the SEU Legal Team if you have any questions or concerns.

We follow data privacy laws

We protect the privacy of all data subjects whose personal data we collect and process (including, for example, patients, healthcare professionals, customers, third parties who do business with us, and employees) by complying with all applicable laws and regulations which protect personal data in the countries where we operate. We do not use or share personal data in a manner that is inconsistent with the privacy notice provided to data subjects when their personal data was collected and any consent obtained.

We require third party suppliers who process personal data on our behalf to meet the same high standards of privacy and security protection for personal data.

We are all responsible for **immediately** reporting all actual or suspected information security incidents (including data breaches) to the Data Protection Lead (at dbm@shionogi.eu) and the IT Team (at itsupport@shionogi.eu).



For more information see the [SEU Data Protection Policy and Data Breach Management Policy](#).



We succeed
together when we
protect all the assets
that make us
Shionogi Europe.

1. Be Mindful

2. Put patients first

3. Demonstrate
accountability

4. Deal fairly
with others

5. Protect our
company assets

6. Celebrate our
diversity and care
for each other

7. Care for our
communities
and environment



5. Protect our company assets

5. Protect our company assets

The way we manage Shionogi Europe's company assets, both tangible and intangible, is important. This includes how we preserve our reputation (which is our most important asset), protect and use our intellectual property, confidential information, physical assets and IT systems and equipment.

We protect our intellectual property

Our intellectual property (e.g. our patents, copyrights, trademarks and trade secrets) are valuable company assets which we all have a duty to protect. Our success as a company depends on it.

We also respect the intellectual property rights of third parties and we do not use their intellectual property unless we are certain we have the rights to do so.

Remember that Shionogi owns any work product (such as ideas, inventions and processes) that you develop or design during your work with us to the extent permitted by law.

We protect confidential information

We are all responsible for protecting confidential information in our possession, whether it is about Shionogi or a third party. We also take care to collect and use competitive intelligence in a legal and ethical way.

Before sharing Shionogi confidential information, we enter into a confidentiality agreement that defines how and under what conditions the confidential information can rightfully be used. Only share Shionogi confidential information with those who are authorised to see it. All Shionogi confidential information must be returned to Shionogi Europe when you stop working for us.

Confidential information about Shionogi includes:

- Marketing strategies and product launch plans
- Business plans, processes and procedures
- Financial information (such as pricing, proposals, product costs, financial performance, results)
- Information about our clinical trials (including arrangements with CROs)



We protect physical assets

Physical property and resources are made available to help us do our jobs effectively. You should safeguard our company assets and take care of any property that has been issued to you (e.g. access cards, keys, information technology hardware and software, communication systems) or made available for you to use in the office (e.g. stationery, supplies). Please use our company assets appropriately and professionally at all times. Do not lend, sell or give our company assets away unless you are authorised to do so. Use good judgment and follow the SEU IT Policy and training you have received.

Key Points from the SEU IT Policy:

- Your Shionogi laptop, Shionogi mobile and Shionogi email account must be used for business purposes only.
- Personal email accounts must not be accessed on your Shionogi laptop and must not be used for business purposes.
- Use a privacy screen when using a Shionogi laptop remotely.
- Set complex passwords that cannot be easily guessed and do not share passwords.
- Approved IM business tools may be used on Shionogi IT equipment for business purposes only.
- Storage devices (e.g. USBs, external hard drives, personal mobiles) are often virus sources – do not plug these into the Shionogi laptop.
- All software must be requested and approved by IT Team before it is downloaded.
- Report breaches of the IT Policy to the IT Manager and your Line Manager.



Reporting information security incidents:

We are all responsible for immediately reporting all actual or suspected information security incidents to the Data Protection Lead (at dbm@shionogi.eu) and the IT Team (at itsupport@shionogi.eu).



For more information, see the [SEU IT Policy](#) and [SEU Data Breach Management Policy](#).

We keep complete, accurate, relevant records

Accurate and timely record keeping and reporting helps us protect our intellectual property; safeguard personal and confidential information; provide an accurate picture of our operations, assets and financial condition; comply with our legal, financial, tax and regulatory requirements; avoid unnecessary costs and penalties; and also reflects positively on our reputation and credibility.

It is therefore important that we take care whenever creating, storing and disposing of our business and financial records.



Set out below are some examples of how we build financial integrity into our work processes:

- We follow internal policies and procedures and generally accepted accounting principles so that our records accurately reflect all transactions.
- We do not falsify or mischaracterize any record, account or transaction or alter records.
- We submit and report all business expenses honestly, accurately and in a timely way. If you submit expenses for reimbursement or make payments on behalf of Shionogi, include supporting documentation and required approvals.
- We sell and purchase products and services based on quality, price and service, and never on the basis of giving or receiving payments, gifts, entertainment or favours.

- We prohibit the use of company funds, assets or information for any illegal purpose, including the purchase of privileges through bribes, to make illegal political contributions to a party or candidate, or other illicit payments.
- We are proactive when it comes to spotting financial transactions that might be in breach of anti-money laundering, financial crime or anti-terrorism laws.
- We disclose and record all funds and assets in the appropriate reporting period.
- We retain records and supporting documentation for as long as applicable laws or Shionogi Europe's policies require.

If you are not sure what is required of you, please speak to a member of the SEU Finance Team or SEU Legal Team.



We will
succeed together
in a supportive work
environment that embraces
fairness, equality, respect,
collaboration, inclusion,
diversity and
individuality.

1. Be Mindful

2. Put patients first

3. Demonstrate
accountability

4. Deal fairly
with others

5. Protect our
company assets

6. Celebrate our
diversity and care
for each other

7. Care for our
communities
and environment

A photograph showing a variety of hands of different skin tones stacked on top of each other in a circular arrangement, symbolizing unity and diversity. A green horizontal bar is overlaid on the middle of the image, containing the text "6. Celebrate diversity and care for each other".

6. Celebrate diversity and care for each other

6. Celebrate our diversity and care for each other

We build greatness out of diversity and use our collective strength

Each of us is responsible for helping to create a supportive work environment that embraces fairness, equality, respect, collaboration, inclusion, diversity and individuality.

We celebrate our diverse backgrounds and the fact we all bring different strengths and perspectives to the table. This is part of what makes Shionogi such a strong company and helps us all to achieve our goals.

We promote equal opportunity

We promote equal opportunity in our employment practices and comply with all laws designed to protect against the discrimination of individuals based on our differences. This helps Shionogi Europe attract, develop and retain the most talented people.

We offer roles to the most qualified candidates based on their knowledge, skills and ability.

We are caring and respectful

Our success depends on the mutual care and respect we must continue to show to each other, our business partners and our communities.

We promote a harassment-free workplace where everyone is treated with respect. We do not tolerate any improper, unreasonable or offensive behaviour (whether verbal, visual or physical). This includes inappropriate behaviour which interferes with someone's work or creates a hostile or intimidating work environment, such as:

- Racial or religious slurs
- Comments, emails, jokes or pictures which are offensive, derogatory, intimidating or include sexual content
- Unwanted physical contact or violence.



We keep our workplace safe and healthy

We seek to provide a safe and healthy workplace for our employees and visitors to our offices and we comply with all applicable health and safety laws wherever we operate.

We must all be aware of and follow safety procedures in our workplaces. You must report any health and safety issues to your Line Manager, the SEU People Team or the SEU Legal Team. We can only achieve our goal of a safe and healthy workplace if everyone actively participates and supports this goal.

We provide our employees with resources to support and promote their well-being. Work-life balance is integral to everything that we represent at Shionogi Europe and in appropriate circumstances we support home and flexible working.

It is a breach of our policies to work while under the influence of drugs, alcohol or other substances that harm your ability to work safely and effectively.

We are prepared for an emergency or crisis

Shionogi has plans in place to ensure our people are protected and there is business continuity should an event, epidemic or natural disaster cause disruption to our usual business activities. Please keep your contact information up to date to ensure you, or your designated contact, can be reached in an emergency or crisis situation.

We do not tolerate forced labour or slavery

Shionogi Europe does not tolerate any form of slavery or forced labour in our operations or in the operations of our suppliers or vendors.



For more information see the [SEU Health and Safety Policy](#)



We support human rights

We show respect for the rights of every individual by supporting the principles set out by the United Nation's Universal Declaration of Human Rights and all employment laws in every country in which we do business.

We seek to work with third parties that share our commitment to human rights and fair and legal employment practices.



We succeed
together when
we care for our
communities and
environment.

1. Be Mindful

2. Put patients first

3. Demonstrate
accountability

4. Deal fairly
with others

5. Protect our
company assets

6. Celebrate our
diversity and care
for each other

7. Care for our
communities
and environment



7. Care for our communities and environment

7. Care for our communities and environment

Shionogi Europe has an important corporate social responsibility to improve patients' lives, ensure the health and safety of those who work with us, give back to our communities, and minimise our impact on the global environment. We are transparent about our business practices and we constantly strive to improve the way we operate.

Help us preserve the environment

We identify and monitor environmental, health and safety (EHS) risks and encourage a culture of safe, environmentally-friendly behaviour. Globally, Shionogi is continuously striving to reduce the impact of our business on the environment across our entire value chain and our efforts include:

- Complying with all EHS laws, regulations and our EHS policies and procedures and expecting suppliers to comply with applicable EHS laws.
- Reducing CO2 emissions, use of energy, water and other natural resources and waste generation.
- Strengthening the management of chemical substances.
- Raising awareness of environmental protection.

Make sure you promptly report any situation or business practice that poses an environmental, health or safety concern to your Line Manager, the SEU People Team or SEU Legal Team.



We support our communities

We support and respect the communities and cultures where we work and understand the impact our business may have on these communities. We support worthy charitable causes in the communities in which we operate. All those involved with charities have a responsibility to ensure any grants and donations are in line with our policies.

Our work with government and non-government organisations is ethical

It is important that Shionogi Europe builds lasting relationships with governments and that we engage with international organisations and civil society so we can help them to develop robust policies and regulations that affect our business.

We do not make political contributions

Shionogi Europe respects the political process and we do not favour any political party or political group. You should not commit any Shionogi Europe funds for the purpose of election or re-election of a particular party or individual.

Thank you for your commitment to our Code

Thank you for your commitment to the Shionogi Europe Code of Conduct. It is up to each one of us to make decisions the right way, live our values, preserve our reputation and do the right thing. Remember to not only follow our Code, but also our policies and procedures and the laws and regulations applicable to your work whilst continuing to exercise your own good judgment. This will ensure that we continue to build on the trust that Shionogi has earned over so many years and keep Shionogi the kind of company that we are all proud to work for.

If something does not feel right or puts Shionogi, our colleagues or the patients we serve at risk, make sure you Speak Up about your concerns. By Speaking Up you will enable Shionogi to promptly investigate and resolve any issues before they become significant.

Thank you for your continued commitment to succeeding together.





Succeeding
Together

Shionogi B.V.
Kingsfordweg 151, 1043GR, Amsterdam, the Netherlands

