

DAIICHI SANKYO, INC.'S CORPORATE COMPLIANCE PROGRAM

Daiichi Sankyo, Inc. (“Daiichi Sankyo”) has implemented a Corporate Compliance Program developed based on the fundamental elements described in the Office of Inspector General’s Compliance Program Guidance for Pharmaceutical Manufacturers (“OIG Guidance”). Our Corporate Compliance Program is a key component of our commitment to the highest standards of corporate conduct. The Corporate Compliance Program is reasonably designed to foster compliance with applicable laws and regulations; the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (“PhRMA Code”); and other requirements relevant to our business.

The fundamental elements of our Corporate Compliance Program are described in greater detail below. Because our Corporate Compliance Program is dynamic, we review and enhance the Corporate Compliance Program to meet evolving compliance standards.

Overview of Corporate Compliance Program

Compliance Officer & Compliance Committee

Daiichi Sankyo has a Chief Ethics & Compliance Officer responsible for implementing, operating and monitoring the Corporate Compliance Program. Daiichi Sankyo also has established a Corporate Ethics & Compliance Committee charged with assisting the Chief Ethics & Compliance Officer and overseeing the operation of the Corporate Compliance Program.

Written Standards

Daiichi Sankyo’s US Standards of Business Conduct is our statement of ethical and compliance principles that guide our daily operations. The US Standards of Business Conduct and the Standards of Business Conduct & Ethics for Third Parties also establish that we expect management, employees, and agents of Daiichi Sankyo to act in accordance with law and applicable company policies, procedures and guidelines. The US Standards of Business Conduct is supplemented by policies, procedures and other guidelines that address compliance risk areas, including areas identified in the OIG Guidance and PhRMA Code.

Education and Training

Daiichi Sankyo is committed to communicating our standards, policies, procedures and guidelines to our employees. We provide education and training to new and current employees on a variety of compliance-related topics. Training programs are updated periodically, and additional areas of training are added from time to time.

Internal Lines of Communication

Daiichi Sankyo is committed to fostering open communication between management and our employees and agents. To that end, Daiichi Sankyo has contracted with an independent third party to operate a confidential hotline available to all employees, vendors, customers, contractors and the public designed to encourage them to ask questions or report concerns without fear of retribution. The number is **1-877-48-ALERT**. Daiichi Sankyo also encourages employees to bring questions or

concerns directly to their manager, Human Resources, the Legal Affairs Department or the Compliance Department.

Auditing and Monitoring

Daiichi Sankyo reviews and assesses business activities for compliance with applicable laws, regulations, guidelines, and company policies and procedures. Corrective action plans are developed to address concerns identified through these reviews.

Disciplinary Guidelines

Daiichi Sankyo takes disciplinary action in response to violations of applicable laws, regulations, guidelines and company policies and procedures. Disciplinary action may include warnings, suspension, termination and other sanctions, as appropriate.

Corrective Action

Daiichi Sankyo responds appropriately to address issues that are identified or reported. Appropriate corrective action may be taken, including disciplinary action, training, and improvement of policies and procedures.

CALIFORNIA HEALTH & SAFETY CODE §§ 119400-119402

Daiichi Sankyo has established an annual dollar limit of \$2,500.00 for applicable spending on individual health care professionals licensed by the state of California in accordance with California Health & Safety Code §§ 119400-119402. This dollar limit represents a spending maximum and not an average or goal. Daiichi Sankyo reserves the right to change this limit at any time.

For a copy of our Corporate Compliance Program and/or annual written declaration of compliance with California Health & Safety Code §§ 119400-119402, please call 877-726-5961 and request to speak with the Chief Ethics & Compliance Officer.

JULY 1, 2019 DECLARATION OF COMPLIANCE WITH CALIFORNIA HEALTH & SAFETY CODE §§ 119400-119402

To our knowledge and based on our good faith understanding of the statutory requirements, Daiichi Sankyo declares that it is in compliance in all material respects with our Corporate Compliance Program and the requirements of California Health & Safety Code §§ 119400-119402.