

Human Rights Policy

Eisai Co., Ltd. and its subsidiaries and affiliates (“Eisai Network Companies” or “ENW”) endeavor to become *human health care (hhc)* companies in line with our Corporate Philosophy which is to give first thought to patients and their families, and to increase the benefits that health care provides to them. Complementing our Charter of Business Conduct, which outlines our commitment to compliance and ethics necessary to fulfill our Corporate Philosophy, this Human Rights Policy (“Policy”) specifically outlines ENW’s approach to implement our responsibility to respect human rights.

This Policy applies to all the executives and employees of ENW. Furthermore, we expect all business partners, including suppliers, to respect human rights in line with this Policy. The Executive Chief Talent Officer of Eisai Co., Ltd. has responsibility for the implementation and management of this Policy.

1. Our Commitment to Respect Human Rights

We are committed to respecting human rights as set out in the International Bill of Human Rights^{*1} and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work^{*2}. In addition, we are a signatory of the United Nations Global Compact and support its ten principles. We also support the United Nations Guiding Principles on Business and Human Rights^{*3} and act in line with them.

We do not tolerate child labor, forced labor, human trafficking, slavery nor any other acts that undermine the dignity or respect of an individual.

We observe local laws, rules and regulations in all countries and regions where we carry out business activities. Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will seek ways to respect internationally recognized human rights to the greatest extent possible.

2. Our approach to Human Rights Due Diligence

In line with the United Nations Guiding Principles on Business and Human Rights, we will conduct human rights due diligence, namely to identify negative human rights impacts with which we are involved, and work to prevent and mitigate such identified impacts.

If negative impacts are directly linked to our products and services through our business relationships, we will strongly request our business partners and other relevant parties

to avoid infringing on human rights, and we will exercise leverage to this end.

3. Respecting Human Rights of Our Stakeholders

We strive to respect the human rights of stakeholders related to our business activities by utilizing a framework for conducting human rights due diligence.

<For Patients and Consumers>

We carry out our activities with an awareness that every product ENW manufactures is directly linked to patients' lives. Based on Eisai's Quality Policy, we consistently strive for high quality through the implementation of robust management that oversees all processes, from research and development to production and distribution. Continually collecting and evaluating product safety information worldwide, we work to ensure that our products are used properly in countries around the world by providing the latest product information to healthcare professionals and patients in a timely manner.

On clinical trials, we make sure to obtain voluntary informed consent from patients and comply with all relevant laws, rules and regulations of each country, as well as international standards. Furthermore, when outsourcing various tasks related to clinical trials, we evaluate the entrusted companies in advance according to ENW policy and standards, and continually monitor their compliance.

We strictly manage and protect the personal information and privacy of patients and consumers and in doing so contribute to protecting their human rights.

We also recognize that contributing to the health of patients in developing and emerging countries is an essential part of respecting their human rights, hence we will strive to continue to improve access to medicines in these countries.

<For Business Partners >

We strive to deepen our understanding of our supply chains, including our suppliers and others working on their behalf. We request all business partners to respect human rights and not to infringe them based on our "Code of Conduct for Business Partners".

<For Employees>

Through rules, programs and policies related to employees, we seek to create a workplace environment in which employees will find it rewarding to strive toward realizing our Corporate Philosophy. We expressly prohibit any kind of harassment and any form of discrimination. At the same time, we actively promote talent development, realization of a comfortable working environment, embrace of diversity, respect for freedom of

association and the right to collective bargaining, responsible labor practices including appropriate working time management, securing minimum wages, and managing occupational health and safety.

4. Stakeholder Engagement

We recognize the importance of continuous dialogues and consultations with stakeholders in the implementation of this Policy. We commit ourselves to engaging with relevant stakeholders so as to understand and address the impact linked to our business activities from the perspectives of those affected, and to respond appropriately.

5. Education and Training

We will endeavor to raise awareness of human rights across all of ENW so that each and every executive and employee may gain a deeper understanding of international human rights principles and respond appropriately to various issues related to human rights.

6. Remedy

We strive to avoid infringing on human rights, and endeavor not to contribute to their infringement. We also endeavor to improve upon our grievance mechanisms for concerns to be effectively raised with ENW, in order to grasp potential adverse human rights impacts associated with our business activities. Where we identify that we have caused or contributed to adverse impacts, we will respond and implement remedial actions, as appropriate and necessary.

7. Disclosure

We will continue to report on the progress of ENW's respect for human rights on our website and in our Integrated Report.

*1 The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenants on Economic, Social and Cultural Rights. It is widely regarded as the fundamental human rights framework by the international community.

*2 The Declaration on Fundamental Principles and Rights at Work adopted by the ILO sets out the following four categories as the minimum labor standard to be observed: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

*3 The United Nations Guiding Principles on Business and Human Rights, endorsed by the United Nations Human Rights Council in 2011, is the authoritative global standard for states and businesses to prevent and address the risk of adverse impact on human rights linked to business activity, which requires corporate responsibility for efforts on respect to human rights and access to relief regarding the issues.

Established: March 20, 2019

Yasushi Okada

**Representative Corporate Officer
Chief Talent Officer
Eisai Co., Ltd.**