

Shionogi Europe Speak Up Reporting System

FAQ's

1. NAVEX EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global. It is intended for use by employees and others who observe conduct or behaviour that violates SEU's policies or procedures. If you would like more information about Navex, please visit their website:

<https://www.navexglobal.com/en-us>

In Shionogi's Speak Up policy, we refer to the EthicsPoint system, as *SEU's Speak Up Reporting System*.

Why Does Shionogi Europe Use EthicsPoint?

SEU uses the Navex system, EthicsPoint, because it is a comprehensive and confidential tool for reporting your concerns. It is available 24/7. Everyone at SEU is encouraged Speak Up and EthicsPoint allows you to report your concerns through the web, or by calling the hotline; your call will be answered by trained representatives.

The EthicsPoint system has reporting and trend functionality that is helpful to Shionogi B.V.

In Shionogi's Speak Up policy, we refer to the EthicsPoint system as "*SEU's Speak Up Reporting System*".

2. Using the SEU Speak Up Reporting System – General

May I report using either the internet or the telephone?

Yes. The SEU Speak Up reporting system allows you to file confidential, anonymous reports via either the telephone or the internet, in your own language.

What type of situations should I report?

The SEU Speak Up reporting system can be used to raise concerns about suspected wrongdoing within SEU, for example, failure to comply with the law, SEU policies and procedures, or any dangers relating to SEU's activities. Examples of the types of issues that can be reported using the SEU Speak Up reporting system include:

- Fraud and other types of financial misconduct;
- Bribery;
- Gifts or hospitality in breach of policy;
- Facilitation of tax evasion;
- Conflicts of interest;
- Violations of competition laws;
- False or inadequate record keeping;
- Environmental health and safety issues;
- Misuse of personal data or confidential information;
- Misconduct/inappropriate behaviour/discrimination or harassment
- Breach of IT policies;
- Inappropriate product promotion;
- Research misconduct;
- Any criminal activity.

The SEU Speak Up reporting system should not be used to address employee complaints about the terms of your employment or how you have been treated at work. Issues such as this should be addressed by contacting your line manager or a member of the SEU People Team.

The SEU Speak Up reporting system should not be used to report adverse events or product complaints. For adverse event and product compliant reporting, please contact: contact@shionogi.eu

You should not use the SEU Speak Up reporting system to report emergencies or events presenting an immediate threat to life or property. In these circumstances, you should contact the emergency services in your country.

I am not sure what category within the SEU Speak Up reporting system, I should file my report under.

The issue categories within the SEU Speak Up reporting system are for administrative purposes only. Irrespective of the category that you file the report under, your report will be investigated; even if you have filed it under an inappropriate category. If you are unsure of which category to use, you can use the category, "Other".

If I see something that appears wrong, shouldn't I just report it to my line manager?

When you observe behaviour that you believe violates our policies and procedures, we expect you to report it. Ideally, you should report your concerns to your line manager, a member of the SEU People Team or a member of the SEU Legal Team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this way. This is the reason that we have invested in the SEU Speak Up reporting system.

We would prefer that you report anonymously rather than keep the information to yourself.

Why should I report what I know? What's in it for me?

We encourage you to Speak Up for the benefit of everyone at Shionogi Europe. When you speak up, you give the Company the opportunity to promptly investigate and resolve any issues.

In accordance with the SEU Speak Up Policy, Shionogi does not tolerate victimisation, harassment, bullying or any other detrimental treatment of any individual who Speaks Up.

Does management really want me to report?

Yes. The Shionogi B.V Board has endorsed the SEU Speak Up Policy and encourages you to use the SEU Speak Up reporting system in appropriate circumstances.

Reporting can minimize the potential negative impact of a serious issue for the benefit of everyone at Shionogi Europe.

Where do these reports made through the system go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, and then investigating appropriately. More information about the investigation process is set out in the SEU Speak Up policy.

How will I know my report has been taken seriously?

All reports are investigated. When a report is received through the SEU Speak Up reporting system, the specific action taken will depend on the nature of the allegation(s). In order to maintain the confidentiality and anonymity of everyone involved (including you), you may not be aware that an investigation is taking place.

3. Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with - won't this log identify me as a report originator?

The EthicsPoint system (at SEU, this is known as the SEU Speak Up reporting system), does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to the EthicsPoint system is available. In fact, Navex, the company that operates the EthicsPoint system, is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside the work environment (such as one located at an Internet café, at a friend's house, etc.) and entering your report into the EthicsPoint system. Many people choose this option. Navex data shows that fewer than 12% of all the reports that are entered into the EthicsPoint system, are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer, or any internet portal, will remain secure and anonymous. The EthicsPoint system strips away internet addresses so that anonymity is totally maintained. Navex is contractually committed not to pursue a reporter's identity.

I am concerned that the information I enter into the SEU Speak Up reporting system will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint reporting system is designed to protect your anonymity. However, if you wish to remain anonymous, it is also important to ensure that the report that you make does not reveal your identity by accident. For example, you should avoid providing information such as the time that you have been employed in the company, where you come from, where you sit in the office and references to "my manager". Even if we were able to identify you from the information that you have provided, if you wish to remain anonymous, we will respect that decision to the extent we are able to do so in accordance with local laws.

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an internet-based report and a trained interviewer will type your responses into the SEU Speak Up reporting system. These reports have the same security and confidentiality measures applied to them as reports that are filed directly through the internet.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish to do so.

4. Tips & Best Practices

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report using either the telephone or the internet. We would rather that you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you weren't sure. If you file a report out of a genuine concern then we will support you.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The SEU Speak Up reporting system is designed so that implicated parties are not notified or granted access to reports in which they have been named. More information about the investigation process can be found in the SEU Speak Up policy.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the SEU Speak Up reporting system, whether by telephone or the internet, you receive a unique user name and are asked to choose a password. You can return to the SEU Speak Up reporting system again, either by internet or telephone in order to access the original report to add more detail or answer questions posed by a company representative or add further information that will help resolve open issues.

We strongly suggest that you return to the system in the time requested, to answer any questions.

Are these follow-ups on reports as secure as the first one?

All correspondence, whether in writing through the internet, or provided verbally through the telephone and then recorded in a typed document, is held in the same strict confidence as the initial report. If you have decided to remain anonymous then, to the extent permitted by local laws, your anonymity is protected through the SEU Speak Up reporting system.

Can I still file a report if I don't have access to the Internet?

You can file a report from any computer that can access the internet. If you don't have access to, or are uncomfortable using, a computer or just wish to report your concern using the telephone, you can call the SEU Speak Up toll-free hotline, which is available 24 hours a day, 365 days a year.

I have additional questions in relation to the SEU Speak Up Reporting system – Who should I contact?

Please contact a member of the SEU Legal Team or the SEU People Team.