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About the Daiichi Sankyo Global Hotline System

What is the Daiichi Sankyo Global Hotline System?

The Daiichi Sankyo Global Hotline System is a comprehensive and confidential reporting tool created by Daiichi Sankyo's provider NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why does Daiichi Sankyo need a system like the Global Hotline System?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- An anonymous reporting tool is considered a necessary and best business practice under various regulatory schemes and guidance across the world.
- An effective reporting system will augment our other efforts to foster a culture of accountability, integrity, and ethical decision-making.

Why has the Daiichi Sankyo contracted with NAVEX Global for reporting of concerns?

Daiichi Sankyo has contracted with NAVEX Global to provide independent, secure, and confidential telephone and web-based systems for anyone (including employees, agents, customers, and third parties) to report any conduct known or believed to be in violation of applicable law and regulations, or Daiichi Sankyo policies and procedures. .

In addition to providing service 24 hours a day, NAVEX Global offers translation services that allow telephone and web reports to be made in dozens of languages.

What is NAVEX Global's role?

NAVEX Global's principal responsibilities are to:

- Provide confidential telephone and web-based options for reporting any conduct known or believed to be in violation of applicable law and regulations, or Daiichi Sankyo policies and procedures.
- Provide translation services that allow telephone and web reports to be made in dozens of languages.
- Transmit information about the reports to the Daiichi Sankyo affiliate concerned with the content of the report to enable an appropriate investigation.
- Protect the identity of, and serve as an intermediary to, anyone who wishes to make an anonymous report.
- Relay follow-up questions and answers to anonymous reporters and provide information about resolution of the case.

It is **not** NAVEX Global's role to take action to address reports of misconduct or other concerns, only to transmit the report to the related Daiichi Sankyo affiliate.

How does Daiichi Sankyo investigate concerns?

NAVEX Global notifies the concerned Daiichi Sankyo affiliate when a report is submitted. The concerned Daiichi Sankyo affiliate then begins an investigation, using independent internal or external resources with expertise conducting investigations.

The information in your report is shared with appropriate investigation team members, and the concern is investigated promptly and discreetly. You may monitor the status of the investigation on the Daiichi Sankyo Hotline System website or speak to a specialist at the NAVEX Global Call Center.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With the Global Hotline System, you can file a confidential, anonymous report via either the telephone or the Internet.

If you wish to report any conduct known or believed to be in violation of applicable law and regulations or Daiichi Sankyo policies and procedures, you may complete a report on this website. You may also speak with a specialist in NAVEX Global's call center. You will have the option to remain anonymous.

Global phone numbers for the Global Hotline System vary by country and are available 24 hours a day. In all countries, you may dial these telephone numbers at no cost to you.

In most cases, phone lines will initially be answered in English. By stating your preferred language, the live operator who answers your call will bring an interpreter on the line if you would prefer to report your concern in a language other than English. It may take a few minutes for an interpreter to join the call so please be patient and do not hang up.

If the telephone number is not functioning or an interpreter is not available in your local language, please make your report online via the website.

What type of situations should I report?

The Daiichi Sankyo Global Hotline System is designed for employees, agents, customers or third parties to report any violation of applicable law and regulations, Daiichi Sankyo policies and procedures, or other concerns you may have.

If I notice a violation or suspected violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates applicable law or regulations or our Daiichi Sankyo policies and procedures, we expect you to report it. Ideally, you should bring any concerns forward to your direct line manager, or other member(s) of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we provide you with the Daiichi Sankyo Global Hotline System. We would rather you report (anonymously if you wish) than keep the information to yourself.

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

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner, and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in Daiichi Sankyo - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the NAVEX Global secure server to prevent any possible breach in security. The Daiichi Sankyo Global Hotline System makes the submitted reports available only to specifically designated individuals within the relevant Daiichi Sankyo affiliate who are charged with evaluating and investigating the allegations in the report, for example members of the Compliance or Legal departments. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Isn't this system just an example of someone watching over me?

No. This system does not watch over you. Rather, it provides you with the opportunity to report potential misconduct that you have observed, or seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. In this way, you are doing your part to ensure that Daiichi Sankyo maintains its commitment to a safe, secure, and ethical workplace.

Effective communication is critical in today's workplace and this is a great tool to enhance that communication. We have carefully chosen the Daiichi Sankyo Global Hotline System as a reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

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, and won't this log identify me as a report originator?

The Daiichi Sankyo Global Hotline System does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Daiichi Sankyo Global Hotline System is available. In fact, NAVEX Global is contractually committed not to pursue a reporter's identity with this reporting tool. NAVEX Global does not trace phone calls or use Caller Identification. Website reports come through a secure Internet portal, which does not trace or show user screen names. Further, NAVEX Global does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses.

No information links your computer to NAVEX Global if you choose to make a report online.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the Daiichi Sankyo Global Hotline System secure website.

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

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Daiichi Sankyo Global Hotline System strips away Internet addresses so that anonymity is totally maintained. Plus, NAVEX Global is contractually committed not to pursue a reporter's identity with this reporting tool.

I am concerned that the information I provide via the Daiichi Sankyo Global Hotline System will ultimately reveal my identity. How can you assure me that will not happen?

The Daiichi Sankyo Global Hotline System is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...". Be mindful of providing details of that specifically identify you. However, when reporting anonymously, we do ask that you provide sufficient details about the incident so that it can be properly investigated.

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. An interviewer in your preferred language will type your responses into the Daiichi Sankyo Global Hotline System. These reports have the same security and confidentiality measures applied to them during delivery. At the end of your telephone or web-based submission, you will receive a unique username and are asked to choose a password. Please retain your unique username and password to monitor progress or provide additional information, if necessary. This process also allows investigators to ask follow-up questions to those who wish to remain anonymous.

Should I identify myself or what if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. If provided, your identity shall be kept confidential and revealed only to the persons in charge of the investigation, unless you knowingly submit a false report. No attempt will be made to determine your identity through electronic means. However, providing your contact info may help expedite the investigation.

Daiichi Sankyo strives to preserve the anonymity and confidentiality of individuals who submit reports through the Daiichi Sankyo Global Hotline System. However, some identities may become apparent during an investigation. In the event of government investigation of your complaint or pursuant to judicial procedure rules, we may be required to disclose your identity.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Daiichi Sankyo chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics may have on an otherwise healthy company. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

Moreover, Daiichi Sankyo expects its employees to report violations of company policy, applicable law, or other misconduct when they become aware of it. If an investigation reveals that an employee was aware of misconduct but chose not to report it, that employee may also be subject to discipline according to applicable local law.

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

File a report. Consistent with our Daiichi Sankyo business philosophy, it is our policy to fully comply with the laws and regulations in our countries of operation. The Daiichi Sankyo Global Hotline System can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure. As long as you have raised a concern in good faith, you will not be subject to disciplinary action, will not suffer any form of retribution, victimization or detriment as a result of your actions, even if the investigation finds your allegations to be unproven. Daiichi Sankyo will not tolerate threats or acts of retaliation against individuals who, in good faith, provide information in connection with reports of actual or potential misconduct.

What if I face retaliation for reporting misconduct or unethical behavior?

Daiichi Sankyo will not tolerate threats or acts of retaliation against individuals who, in good faith, provide information in connection with reports of actual or potential misconduct. Disciplinary action, up to and including immediate termination of employment, will be taken against any employee who retaliates against others who report such violations.

Believe you have faced retaliation? Employees should contact and speak with a local Human Resources representative. Non-employees and those who wish to remain anonymous should utilize the Daiichi Sankyo Hotline System reporting option.

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

No. The Daiichi Sankyo Global Hotline System and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. Access is granted only to specifically designated individuals at each Daiichi Sankyo affiliate who are responsible for evaluating and investigating reports related to that affiliate. The investigation will be carried out on a confidential basis.

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 Daiichi Sankyo Global Hotline System Web site or through the Call Center, you receive a unique username and are asked to choose a password. You can return to the Daiichi Sankyo Global Hotline System again either by Internet or telephone and access the

original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

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

All Daiichi Sankyo Global Hotline System correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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

You can file a report to the Daiichi Sankyo Global Hotline System from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the toll-free hotline number specific to your location, which is available 24 hours a day, 365 days a year and submit your report in dialogue with an interviewer in your selected language.

How can I monitor progress on my report or question?

At the end of your telephone or web-based submission, you will receive a unique username and are asked to choose a password. You will be asked to call back or visit the Daiichi Sankyo Hotline System website 7-10 business days after your initial report. At that time, you can monitor progress on your report or question and learn whether any additional information is needed from you to address your concern.

What should I do if I lose my unique user name and/or password?

Because of the high level of confidentiality that is maintained for reports, you will be required to file a new report if you lose your unique user name and/or password. You may mention in the new report that this matter relates to a report previously submitted.