

Policy on Advisory Engagement (Consulting)

Background

Astellas may engage healthcare professionals (HCPs) and other external advisors in order to obtain outside expert advice, opinions and feedback on the development and commercialization of Astellas products and compounds or other appropriate business needs.

Astellas is committed to conducting its business throughout the world in accordance with applicable laws, rules, regulations, codes, guidelines and in accordance with high ethical standards. The purpose of this policy is to establish the governing principles when conducting advisory (Consulting) engagement activities.

Our Position

The following principles apply to all engagements where Astellas seeks expert advice, opinions and feedback from advisors and other stakeholders on topics of importance to the company. This includes advisory board meeting, scientific expert meetings, roundtable meetings, or other consulting arrangements where HCPs receive a fee-for-service (FFS):

1. There is a legitimate and documented commercial, scientific, or other appropriate business need for the services on the part of Astellas;
2. The engagement is not a duplication of other previously conducted advisory (consulting) engagements and offers additional value to Astellas.
3. No element of the engagement is used to induce, influence, or reward an advisor for prescribing, supplying, or using any Astellas product or to build a relationship with, seek to gain goodwill or to gain access to an HCP
4. The HCP is selected based on his/her qualifications, expertise, capabilities, experiences and/or other appropriate criteria directly related to the identified need;
5. A written contract is in place prior to the commencement of the services that accurately describes the nature of the services and the basis for remuneration;
6. All compensation reflects fair market value for the services provided;
7. Any meeting or event we organize or sponsor for the HCP to perform services is held at an appropriate venue that is conducive to the purpose of the meeting or event; and
8. Any travel, lodging, and meals we provide to the HCP in relation to his/her performance of services are consistent with relevant Company policies.
9. The format and content of any engagement must be designed to solicit and receive the advisors' views, opinions and feedback on matters related to the purpose

10. The arrangements for all interactions must be fully approved to ensure compliance with all applicable policies and procedures
11. Any material or data provided must be related to the services being sought and necessary to accomplish the objectives of the engagement. Associated material requires advance approval according to the applicable local material review process.
12. The advice, opinions and feedback provided by the advisors must be documented in a written or electronic record and used in accordance with the identified need.