

Business conduct

Material Impacts, Risks and Opportunities (IROs)

Business Conduct Policies and Corporate Culture

IRO		Value chain			Time horizon		
I (P/N)	RO	Upstream	Internal	Downstream	Short-term	Mid-term	Long-term
	R		•		•	•	•

When employee compliance violations or inappropriate conduct occur, litigation may arise and regulatory responses may be required, potentially resulting in costs associated with litigation response and legal fine payments. To prevent such situations, the Daiichi Sankyo Group has established global policies regarding compliance and maintains an ethical organizational culture.

Anti-Corruption and Anti-Bribery

IR0		Value chain			Time horizon		
I (P/N)	RO	Upstream	Internal	Downstream	Short-term	Mid-term	Long-term
	R	•	•	•	•	•	•

If bribery or corruption is discovered, it could result in loss of trust from stakeholders, ultimately leading to decreased sales and increased fundraising costs.

To prevent these issues, the Daiichi Sankyo Group has established policies and programs for the prevention and detection of bribery and corruption incidents, strengthening corporate risk management.

Policies, Actions and Performance for Material IROs

Business Conduct Policies and Corporate Culture

Policies

The CEO has appointed a Chief Compliance Officer (CCO), to oversee and manage the global compliance and risk management unit. In accordance with Daiichi Sankyo Group Compliance Management Policy established in April 2025, the Global Ethics and Compliance Committee oversees and advises the Compliance function.

The Daiichi Sankyo Group Employee Code of Conduct (the ECC) was established in April 2020 to provide clearer global uniform standards of the individual behavior expected of the Group's executives and employees. We conduct training programs regularly to increase awareness of the ECC. In addition, Group companies in Japan have established the Compliance Code of Conduct, which sets out specific behavioral standards for officers, employees, and other personnel. This code has been developed in alignment with the Daiichi Sankyo Group Corporate Conduct Charter, the Daiichi Sankyo Group Employee Code of Conduct, and the JPMA Compliance Program Guidelines issued by the Japan Pharmaceutical Manufacturers Association. Group companies outside Japan have also established internal rules tailored to the laws, regulations, and specific characteristics of their respective countries and regions.

Actions

We are striving to raise compliance awareness within the Group by conducting activities, such as periodic messages (twice a year) from our CEO to the Group regarding the importance of compliance. The Company conducts an annual global compliance survey on corporate culture, targeting all executives and employees of Group companies to monitor the level of compliance awareness.

In order to promote the awareness of compliance, encourage the highest ethical standards, and cultivate an open workplace environment, the Company and the Group companies in Japan conduct small group discussion periodically (Compliance Communication Meeting) using training materials

developed in-house.

Furthermore, the Company conducts compliance training by external specialists on a regular basis for the Company's Board Members, members of the Audit and Supervisory Board, corporate officers of the Company, and Presidents and Auditors in Group companies in Japan. The Group companies in Japan also conduct compliance training annually for new employees and managers.

Group companies outside of Japan conduct compliance training through the face-to-face conversation, e-learning or other methods, as appropriate to each region.

Anti-Corruption and Anti-Bribery

Policies

The Group has specified the prevention of bribery and corruption in the ECC. In order to further ensure compliance particularly in this regard, we have also established the Daiichi Sankyo Group Anti-Bribery & Anti-Corruption Policy, which sets forth more detailed rules on the prevention of bribery and corruption, including the prohibition of cash payments to government officials and healthcare professionals.

Through a series of initiatives across the Group, we appropriately prevent, detect, and respond to suspected or actual cases of bribery and corruption. These initiatives include training on the Daiichi Sankyo Group Anti-Bribery and Anti-Corruption Policy, education on proper internal reporting procedures, regular audits and monitoring to identify high-risk functions, and the reporting of suspected cases arising in relevant regions or local affiliates to the Group's Board of Directors.

We communicate our principles on anti-bribery and anti-corruption to all executives, employees, and dispatched staff through key pages on the corporate website, global training programs, internal policies and procedures, and compliance communications. In addition, the Daiichi Sankyo Group requires all executives, employees, and dispatched staff to complete training on anti-bribery and anti-corruption.

Performance

KPI and Target as of FY2025	FY2024 Results		
Number of signicant compliance violations*1: 0	0		
Number of Notable Industry Code Violations (NICV)*2:0	3		
Improvement of periodic employee survey scores on ethical culture following baseline	93% of positive response rate(+7 YoY)		
Conduction of continuous compliance and promotional activities monitoring at each company	Conducted monitoring at each company		

^{*1} Compliance violations which occur in domestic and overseas group companies are regarded as signicant when disclosure under the relevant laws or regulations is required by the DS group

^{*2} Cases where there have been healthcare-related ndings by the pharmaceutical regulatory authorities and industryrelated organizations that may materially discredit or reduce condence in Daiichi Sankyo Group of companies