

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT

## OF TAKEDA UK LIMITED

for Financial Year ended 31 March 2017 pursuant to section 54(5) of the Modern Slavery Act 2015



**TAKEDA GROUP**  
in over **70 countries**

.....

**30,000 EMPLOYEES**  
WORLDWIDE

.....

**1,400+ SUPPLIERS**  
ACKNOWLEDGED

**OUR SUPPLIER CODE OF CONDUCT**

.....

**3,400+ SUPPLIERS**  
COMPLETED  
SUPPLIER DUE DILIGENCE

.....

**28 SUSTAINABLE PROCUREMENT ASSESSMENTS CONDUCTED**

### Introduction

Takeda recognises that slavery, human trafficking, servitude and forced labour (Modern Slavery) are unacceptable practices and a global challenge for governments and businesses.

We have a responsibility to be alert to the prevalence of such risks within our business and wider supply chain.

We welcome the transparency promoted by section 54 of the UK Modern Slavery Act in line with our commitment to the United Nations Global Compact and the Dow Jones Sustainability Asia Pacific Index, both of which enable Takeda to demonstrate its commitment to respecting human rights across our business and supply chains.

### Our business and organisational structure

Takeda is a patient-focused, innovation-driven global pharmaceutical company that builds on a distinguished 236 year history, aspiring to bring better

health and a brighter future for people worldwide.

Takeda’s pharmaceutical products are marketed in around 100 countries including partnerships (marketing alliance partners) and the network of the Takeda group spans over 70 countries and employs over 30,000 people worldwide.

Takeda UK Limited is based in Wooburn Green, United Kingdom, and is the commercial sales and marketing organisation for Takeda in the UK. Its activities include the sales, marketing and distribution of Takeda’s pharmaceutical products, in accordance with regulatory processes and codes.

Takeda UK Limited’s principal supply chains and customers include:

- Engagement of healthcare institutions and healthcare professionals to participate in commercial deals
- Procurement of commercial service providers and other professional services as required

to support the effective operation of the business

- Procurement of staff, commercial service providers and other professional services to operate and maintain Takeda UK Limited office.

## **Policies in relation to slavery and human trafficking**

### **Our Corporate Philosophy**

In order to fulfil the social expectations of patients and to achieve recognition for its value to society, Takeda expects that, in addition to complying with the laws and regulations, it is essential for Takeda employees to conduct business with a high ethical and moral standard through the practical implementation of the corporate philosophy, “Takeda-ism”.

This corporate philosophy requires that all Takeda employees act with integrity, fairness, honesty and perseverance, and the highest ethical standards in all Takeda business activities; this comes before everything else.

In addition, the Takeda Supplier Code of Conduct is aimed at ensuring that suppliers to Takeda align with our core business values.

### **Takeda’s Global Code of Conduct and Takeda UK Limited Policy**

Takeda respects the human rights and diversity of its employees and observes the employment laws and regulations in each country. Every Takeda company is committed to operating in line with the Takeda Global Code of Conduct, which demands the highest standards of ethical behaviour including the treatment of employees.

The Code affirms Takeda’s commitment to providing a safe and healthy working

environment which is free of harassment and discrimination.

The Takeda UK Limited Employee Handbook also emphasizes Takeda UK Limited’s policy to be an equal opportunity employer, and Takeda UK Limited’s commitment to provide a healthy and safe working environment that is free from harassment and bullying.

To facilitate reporting by employees of any concerns or compliance issues, Takeda has a web-based Global Compliance Helpline. In addition, employees at Takeda UK Limited may raise any concerns locally with their manager, another manager, or human resources, legal or compliance personnel.

### **Takeda’s Clinical Practices**

Takeda’s clinical studies are carried out in accordance with international standards. These standards ensure that the rights of individuals who participate in clinical studies are protected, and in particular that such individuals give their voluntary agreement (informed consent) to participate in studies, and are free to stop their participation at any time.

### **Corporate Social Responsibility & Sustainable Procurement**

From a global perspective, Takeda is doing its utmost to protect human rights through the value chain.

Takeda is a lead company within the United Nations Global Compact (GC), and collaborates through activities to implement and promote the spread of the United Nations GC principles. On an annual basis, Takeda publishes its CSR Data Book which discloses CSR-related information,

making reference to the United Nations Global Compact Advanced Level criteria, the Global Reporting Initiative's fourth generation of Sustainability Reporting Guidelines (G4), and the International Integrated Reporting Council (IIRC) International Integrated Reporting Framework, and other guidelines.

In addition, Takeda's Global Procurement function has a Risk & Sustainable Procurement team dedicated to ensuring Takeda's suppliers understand and adhere to Takeda's Supplier Code of Conduct.

This team is responsible for ensuring supplier sustainability and human rights criteria are factored into supplier qualification, retention and supplier relationship management.

### **Takeda's Supplier Code of Conduct**

Takeda's Supplier Code of Conduct supports our commitment to uphold the UN Global Compact's 10 universally accepted principles in the areas of human rights, labour, environment and anticorruption.

Additionally, since 2015 Takeda has been a member of the Pharmaceutical Supply Chain Initiative (PSCI) providing alignment with societal and industry expectations for sustainability performance in the pharmaceutical industry and with its supplier base. Thus, the Takeda Supplier Code is aligned with the PSCI Principles.

Takeda's suppliers are required to adhere to applicable legal requirements and acknowledge their aspirations to meet the expectations contained within this code. Section 6.0 of code specifically outlines Takeda's expectations in the areas of Human Rights, Labour &

Employment Practices and Health & Safety. Within the financial year ended 31 March 2017 over 1,400 suppliers, including over 70 of the company's major suppliers, committed to advancing Sustainable Procurement at Takeda by acknowledging the Supplier Code of Conduct.

In addition, the code includes instructions for suppliers to contact Takeda's Global Compliance Helpline to report any supplier-related issues.

### **Assessing risk in relation to slavery and human trafficking in our business and supply chains**

For staff employed, Takeda UK Limited or its service providers verify their immigration status and right-to-work in the relevant country. Within the financial year ended 31 March 2017, 100% of Takeda UK Limited employees were verified for their immigration status and right-to-work in the relevant country.

Takeda has implemented a robust due diligence process to systematically evaluate new suppliers or renewed supplier relationships involved in sourcing projects on areas of sustainability risk, including human rights related risks, particularly in emerging and developing countries.

The due diligence process covers all direct and indirect suppliers to Takeda meeting a determined spend threshold and provides insight into potential risk factors related to supplier engagements based on the sector and country of engagement.

Suppliers that present a higher risk through this due diligence process undergo an enhanced assessment. An example of a supplier qualification question included in Takeda's Procurement process that highlights potential

risk for modern slavery includes the amount of a supplier’s workforce that rely on temporary contracts.

The response to this question, in addition to inherent country risk for labour issues, can be triggers for deeper diligence.

**Effectiveness in addressing key risk areas of our business and supply chains where modern slavery and or human trafficking may take place**

The supply chain of Takeda is complex, and generally consists of suppliers of direct materials and indirect service.

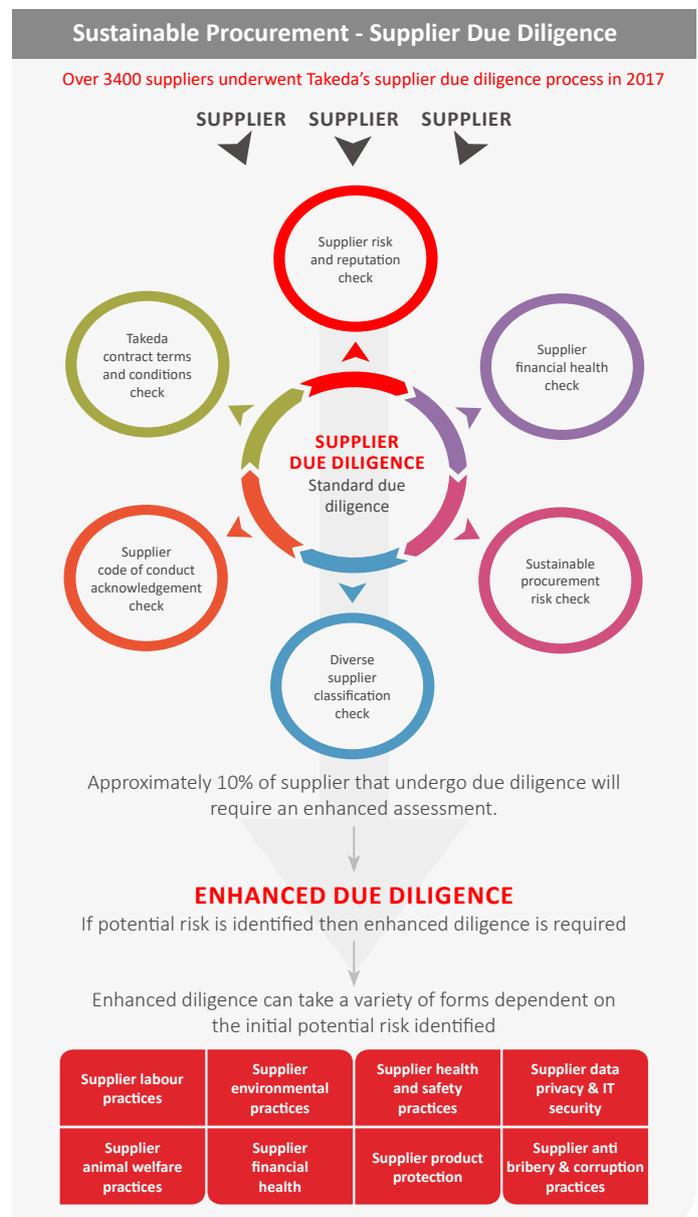
Through the supplier due diligence process Takeda evaluates how these suppliers fulfil the principles contained within the Supplier Code of Conduct, and expects suppliers to cooperate fully, including remediating identified issues.

Where potential for risk has been identified in relation to human rights and labour standards, Takeda utilises a number of different enhanced assessment approaches that reflect the diverse complexity of its supply chain.

Within the financial year ended 31 March 2017, over 3400 new and existing suppliers to Takeda underwent a due diligence assessment.

In addition, within the financial year Takeda conducted 28 Sustainable Procurement Assessments (audits) across seven countries to verify adherence to Takeda’s Supplier Code of Conduct and the Pharmaceutical Supply Chain Initiative Principles.

Labour and human rights related findings accounted for 13% of the total findings with



effective remediation plans being put in place.

None of the audits identified modern slavery -conditions of forced or child labour, human trafficking, slavery or servitude.

In addition, Takeda’s Global Compliance office has not received any complaints into the

Global Compliance Helpline for any matters related to modern slavery. We know that auditing our suppliers delivers accountability and improvements within our supply chain by providing a verification against our supplier code expectation and delivering time-bound plans for remediation where required.

However, we also recognise that audits work best as part of an on-going approach to engagement and continuous improvement.

During 2016 Takeda implemented the EcoVadis platform which provides CSR scorecards of suppliers, providing the ability to monitor environmental, ethical and human rights practices of suppliers remotely and on a continuous basis.

Within the year ended 31 March 2017 over 30 of Takeda's suppliers shared their approach to human rights with Takeda via the platform. One of the key benefits of Ecovadis is that it also rates the maturity of our suppliers implementing their own sustainable procurement program. Areas for improvement within this performance criteria are a focus for our team sustainable procurement team and helps address modern slavery risk in deeper areas of the supply chain. We aim to significantly expand the utilisation of this platform throughout the current financial year.

In addition, Takeda service providers who perform regulated activities (such as clinical trial and pharmaceutical manufacturing sites) are subject to monitoring visits and/or regulatory compliance audits by Takeda and inspections by pharmaceutical regulatory authorities.

Although not specifically directed at risks of

slavery and human trafficking, Takeda would expect any issues found at such monitoring, audits and inspections to be brought to its attention or addressed by the relevant authorities.

### **Training about slavery and human trafficking available to its staff**

All Takeda UK Limited employees must agree to adhere to the Takeda Global Code of Conduct and the respective TPIZ Employee Handbook as part of their terms and conditions of employment.

Procurement staff and other employees have been trained on Takeda's Supplier Code of Conduct, and how suppliers are qualified through diligence, including the sustainability elements of that qualification.

Approved by the Board of Directors of  
Takeda UK Limited



**Adam Zaeske**  
Managing Director  
Takeda UK Limited