



## STATE OF CALIFORNIA ANNUAL COMPREHENSIVE COMPLIANCE PROGRAM DECLARATION

As part of the continued compliance efforts of Takeda Pharmaceuticals North America, Inc., and its subsidiaries, we have developed a Corporate Ethics & Compliance Program and hereby declare:

To the best of our knowledge, and based upon our good faith understanding of the statutory requirements, our Corporate Ethics & Compliance Program is in compliance with the requirements for a Comprehensive Compliance Program as set forth in California Health and Safety Code §§ 119400-119402.

To the best of our knowledge, we are, in all material respects, in compliance with our Corporate Ethics & Compliance Program.

This declaration is made as of the date indicated below.

We have tailored our Corporate Ethics & Compliance Program to the size and organizational structure of our company, and implemented the program to demonstrate our company's commitment to compliance and to satisfy the statutory requirements of the State of California.

We also have established a specific annual dollar limit of \$2,500.00 on spending for gifts, promotional materials, and items or activities provided to healthcare professionals in California, as required by California law. While we are committed to not exceeding this amount, the establishment of this limit does not mean that we spend this amount on all healthcare professionals. To the contrary, the California law requires the establishment of a maximum dollar limit but in the vast majority of cases, we do not reach this limit.

Takeda's Office of Ethics & Compliance is charged with the continuous improvement of our Corporate Ethics & Compliance Program and will reassess and refine the Program as necessary and appropriate.

Our program is reasonably designed to prevent improper conduct from occurring. As the Office of Inspector General of the US Department of Health and Human Services recognizes in its [OIG Compliance Program Guidance for Pharmaceutical Manufacturers](#), however, the implementation of a compliance program cannot entirely eliminate improper conduct. Accordingly, we cannot, and we do not represent that we can entirely eliminate improper conduct or completely prevent individual employees from engaging in improper conduct. Through our Corporate Ethics & Compliance Program, we have established mechanisms to identify suspected improper conduct and to take appropriate disciplinary and/or corrective action in the event that improper conduct occurs.

A copy of this Declaration and Takeda's Corporate Ethics & Compliance Program can be obtained by calling 1-888-825-3320.

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