



**Astellas Pharma Australia Pty Ltd
Modern Slavery Statement for the Year Ended 31 March 2021**

Introduction / Background

Who is covered by this Modern Slavery statement?

This Modern Slavery statement (**statement**) is made by Astellas Pharma Australia Pty Ltd (ABN 81 147 915 482) with registered office at Level 2, 2 Banfield Rd, Macquarie Park NSW 2113 Australia (referred to as **Astellas Australia**) in accordance with the Australian *Modern Slavery Act 2018* (Cth) (the **Act**) and covers the financial year from 1 April 2020 to 31 March 2021. No other entities are covered by this statement.

Astellas Australia together with other Astellas group companies (**Astellas** in this statement) is dedicated to improving the health of people around the world through the provision of innovative and reliable pharmaceutical products. To find out more about what we do and our values, please go to: <https://www.astellas.com/en>.

Astellas Pharma Inc. (Astellas Australia's parent company) is a signatory to the United Nations Global Compact which demonstrates our existing voluntary support for achieving sustainable growth, including our respect for internationally proclaimed human rights and our desire to ensure that we are not complicit in human rights abuses. In June 2021, Astellas Pharma Inc. was included in the FTSE4 Good Sustainability Index for the tenth consecutive year (with the period evaluated being the financial year ended 31 March 2020) which includes human rights and labour standards as part of its selection criteria.

We know that slavery, servitude, forced or compulsory labour and human trafficking (collectively referred to as "**Modern Slavery**" in this statement) is a global, complex and increasing challenge for governments and business. Astellas is committed to doing its part to monitor and remediate any such issues it identifies in its operations and supply chains.

As a business Astellas recognises our responsibility to respect human rights and manage the risk of Modern Slavery within our own organisation and supply chain.

Our Structure, Operations and Supply Chain

Our Structure

Astellas Australia is a proprietary company, limited by shares and incorporated in New South Wales. Astellas Australia employs approximately 70 people. Astellas Australia does not own or control any other entities.

Astellas Pharma Inc. is the ultimate holding company of the Astellas group including Astellas Australia. Astellas Pharma Inc. is incorporated in Japan and listed on the Tokyo Stock Exchange.

Our Operations

Astellas Australia is the sales and marketing affiliate for Australia and New Zealand. Our operations are conducted from our office in Macquarie Park, Sydney New South Wales.

Astellas Australia imports Astellas products into Australia.

Our Supply Chain

Astellas Australia's supply chain is comprised of suppliers of indirect goods and services (information technology, professional services, sales and marketing agencies and facilities). Examples of the goods and services procured are in the next section.

The products for which Astellas Australia has marketing authorizations are imported from countries outside Australia such as Ireland, the UK and Japan, then delivered by local wholesalers to hospitals and pharmacies.

Potential risks of Modern Slavery practices in our operations and supply chain

In its Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities (Guidance), the Australian Government acknowledges that Modern Slavery is a complex problem and that Modern Slavery 'can occur in every industry and sector'.

The Australian Government recommends in its Guidance that reporting entities take a 'prioritised, risk-based approach' to assessing Modern Slavery risks including to consider risk factors such as the sector, industry, types of products and services, geographic locations and business models.

In our previous statement, we identified key risk areas based on the Guidance. During this reporting year, we have conducted a further review of our risks of Modern Slavery and based on our review, the following risk areas still apply:

- **Product and services:** Astellas Australia procure stationery, including for marketing purposes. Paper is globally recognised as a high-risk product. We procure the paper for our office use through established Australian suppliers who we consider to be lower risk.
- **Sector and industry risks:** Cleaning and electronics are globally recognised as high-risk industries. Astellas Australia uses the same cleaning services arranged by the commercial property manager in the commercial office building where Astellas Australia operates. Our IT department also procures phone headsets, mobile phones, laptops, monitors and accessories from Australian suppliers who we consider to be lower risk.
- **Geographic risks:** We acknowledge that some countries may have higher risks of Modern Slavery. Astellas Australia does not procure goods from overseas entities but does procure some services from overseas entities through an Astellas global contract.

We will use these potential risk factors to prioritise our supplier engagement activities over the next financial year(s).

At a global level, Astellas has conducted risk assessments to identify Modern Slavery risks in Astellas' operations and supply chain. The risk assessments and the outcomes of those assessments conducted at global level are as follows:

- Astellas has implemented a Third-Party Lifecycle Management (**TPLM**) program. The TPLM program assesses our business partners against established requirements covering several global risk domains (including human / labour rights) to ensure compliance. Astellas seeks to actively and appropriately manage risk throughout the lifecycle of a third-party relationship.

This program is overseen by Astellas departments responsible for risk domain(s) that are properly aligned to their expertise.

- As part of the TPLM program, Astellas conducts questionnaire surveys with both Astellas personnel who engage business partners as well as business partners in our supply chain, while assigning subject matter experts to review those responses prior to entering into an agreement. Astellas seeks to continuously measure, mitigate and monitor business partners' inherent risk.
- Astellas implemented the TPLM Program at the Astellas Australia level at the end of November 2020.
- Astellas also has whistleblowing helplines and in the year ended 31 March 2021 there were no significant human rights issues reported through these helplines.

During the year under review these global performance indicators did not identify any heightened risk of Modern Slavery.

Actions taken by us to assess and address risks

A group wide approach

Astellas has taken a global approach to addressing Modern Slavery issues and accordingly Astellas Australia complies with the following group policies that are intended to promote ethical and legally compliant business conduct, respect human rights and manage the risk of Modern Slavery within our own organisation and supply chain. These include:

- [The Astellas Group Code of Conduct](#) states our commitment against forced labour and, in the selection of business partners, their commitment to human rights and labour standards.
- [The Astellas Business Partner Code of Conduct](#) references the human rights of workers and specifically provides that business partners shall not use forced, bonded or indentured labour, involuntary prison labour or child labour.
- [The Astellas Position on Human Rights](#) which emphasizes and expands on our commitment to human rights and high labour standards, has been disclosed since April 2017 and was updated in April 2021. This is a commitment that supports embedding respect for human rights throughout the Astellas Group.
- [Astellas' Materiality Matrix](#) identifies 'Human rights in labour' as one of the 'Most Important' material issues on a scale of 'Important', 'Very Important' and 'Most Important'.

As mentioned above, Astellas has continued to implement the TPLM program to assess and address risks in our third-party business partner relationships and conducted a survey to assess and address human rights risks in our operations.

A speak up culture

Astellas fosters a speak up culture, which has not identified any actual incidents of Modern Slavery. Astellas employees are required to promptly report any known or suspected violation of the Astellas Group Code of Conduct or other illegal or unethical behaviour or business practice. Therefore, if there are any concerns relating to Modern Slavery, these can be raised in confidence without fear of retaliation directly to a manager or through independent third party and internal whistleblowing helplines. Astellas maintains internal accountability standards and procedures for employees or contractors failing to meet Astellas' standards regarding Modern Slavery by documenting and / or investigating alleged violations of the Astellas Group Code of Conduct, which can result in disciplinary

action in accordance with applicable laws, regulations, and Astellas policies and procedures in the relevant country of employment or assignment.

We understand the need for employee feedback and the right to remedy, and so we have implemented reporting mechanisms through which employees can file complaints, without fear of reprisal and on a confidential basis.

Training and education

- Astellas provides an e-learning program to introduce the Astellas Group Code of Conduct which states among other things our commitment to respecting human rights including the prohibition of child labour and forced labour once a year. Full-time and part-time directors, officers and employees worldwide were required to take this program in the year to 31 March 2021.
- A message from the President and CEO was sent to all Astellas group employees to remind them of the importance of Astellas' engagement with human rights issues in December 2020.
- Astellas provides business partners with the Astellas Business Partner Code of Conduct.

Our Approach to Risk Management

Our activities to combat Modern Slavery are risk based and will continue to correspond with the level of risk identified. We consider this to be consistent with the Guidance where the Australian Government encourages reporting entities to take a prioritised, risk-based approach.

Pursuant to the Astellas Group Code of Conduct, Astellas selects business partners based on various qualifying criteria, including their commitment to human and labour rights and other ethical and social responsibility standards, including past conduct relating to those issues.

Astellas has a whistleblowing helpline link on the Astellas global website to enable reporting of a suspected violation of any Astellas policy, procedure or Astellas Code of Conduct. Anyone can access the whistleblowing helpline link (<https://www.astellas.com/en/contact-us>) to report any non-compliance.

If Astellas identifies non-compliance with a contractual, legal, regulatory, or industry-based requirement, Astellas works with business partners to correct the issue. If the issue cannot be corrected, Astellas reserves the right to transition to a different partner.

Communicating what we are doing

Astellas Australia intends to publish this statement on our website.

Measuring Effectiveness

In order to monitor the effectiveness of the steps we are taking; we will continue to:

- monitor Modern Slavery concerns raised with whistleblowing helplines centralized by Astellas; and
- develop a corrective and preventative action plan, including auditing, where we assess that there may be a heightened risk of Modern Slavery with specific business partners.

Astellas Australia has implemented the TPLM program since November 2020. The program assesses our business partners against established requirements covering several global risk domains (including human / labour rights) to ensure compliance.

As part of the TPLM program, Astellas Australia conducts questionnaire surveys with both Astellas personnel who engage business partners as well as business partners in our supply chain, while assigning subject matter experts to review those responses prior to entering into an agreement.

Looking Forward

In order to raise awareness about the risks of Modern Slavery, we will take the following actions during future reporting periods:

- Astellas Australia will seek to actively and appropriately manage risk throughout the lifecycle of a third-party relationship. This program is overseen by Astellas departments responsible for risk domain(s) that are properly aligned to their expertise.
- Astellas will seek to actively and appropriately measure, mitigate and monitor business partners' inherent risk. Since the inception of the TPLM program, there have been limited human / labour rights issues identified to date.

Consultation

Astellas Australia does not own or control other entities and accordingly consultation for the purpose of the Act was not required. We did, however, consult and work with Astellas Pharma Inc. on developing this statement.

Other relevant information

Impacts of Covid-19

In order to secure the safety of our employees and to prevent the further spread of the disease, Astellas continues to monitor the current health guidelines and Covid-19 restrictions. We follow current health guidelines and Covid-19 restrictions when making work arrangements for our employees. Our employees can work from home by using online digital tools.

We understand that Covid-19 has increased the risk of people around the world becoming victims of modern slavery. During the pandemic, we have not increased our reliance on contract workers or agency staff or made changes to our supplier base and our arrangements to pay our suppliers. In line with the requests of governments of each country, we have taken measures to promote the safety of candidates in our recruitment process, as well as to maintain a fair recruitment process.

Given the pandemic, our ability to conduct physical site visits of suppliers has been limited. Instead, we have used remote communication tools and desktop audits to monitor suppliers.

Astellas Australia will continue to take measures to address Modern Slavery risks in our operations and supply chain, including implementing the TPLM program as planned.

Modern Slavery laws in other jurisdictions

Other Astellas group companies are also required to comply with Modern Slavery laws in other jurisdictions. Astellas Australia has had the benefit of working closely with Modern Slavery law experts in other jurisdictions.

In addition, Astellas Australia is sharing information about the Australian regime with other Astellas group companies in recognition that the Act is considered by global civil society groups as a significant "step up" in Modern Slavery law reporting requirements. We hope that this knowledge sharing will contribute in a meaningful way to the development of relevant policies and procedures.

This statement was approved by the board of directors of Astellas Pharma Australia Pty Ltd on 23 July 2021.

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Elizabeth Marett

Director

Astellas Pharma Australia Pty Ltd

28 July 2021

Astellas Pharma Australia Pty Ltd. Registered in New South Wales number ABN 81 147 915 482 with registered office at Level 2, 2 Banfield Rd Macquarie Park NSW 2113 Australia.