



US STANDARDS OF BUSINESS CONDUCT FOR THIRD PARTIES

Daiichi Sankyo, Inc. • American Regent, Inc.



INTRODUCTION

Daiichi Sankyo Inc. (“Daiichi Sankyo”) and American Regent, Inc. (collectively, the “Companies”) are firmly committed to being corporate citizens whose foundations are based on integrity, honesty and ethical conduct.

The Companies are committed to conducting business in compliance with all applicable laws, regulations, guidelines and industry codes.

The Standards of Business Conduct and Ethics for Third Parties applies to groups of third-party organizations with whom the Companies contract to provide services or Products for or on behalf of our Companies as well as Vendors who contract with our affiliates, including Daiichi Sankyo Company, Ltd., and Daiichi Sankyo Europe GmbH, to conduct work related to US-marketed Products. The Standards of Business Conduct and Ethics for Third Parties articulate our commitment and expectations of Third Parties with whom we do business.

The Companies recognize that Third Parties have an important role in the Companies’ success, and the Companies strive to conduct business only with Third Parties who share its commitment to the Standards of Business Conduct and Ethics for Third Parties. Therefore, the Companies encourage Third Parties to:

- Adopt and apply the Standards of Business Conduct and Ethics for Third Parties; and
- Have processes and/or systems in place to support operating in compliance with all applicable laws, regulations, guidelines and industry codes.

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COMPLIANCE AND ETHICS

Third Parties must conduct their business in compliance with applicable laws, regulations, guidelines and industry codes, and in an ethical manner, including:

Business Integrity, Fair Competition and Confidentiality

- The Companies are committed to conducting business free from extortion, bribery and all unlawful, unethical or fraudulent activity. Therefore, Third Parties must not offer, give, promise or authorize any bribe, [Gift](#), loan, fee, reward or other advantages to any [Government Official](#) or [Employee, Customer](#), any Company Employee or any other person to obtain any business advantage or improperly influence any action or decision. Third Parties must conduct their business consistent with fair and vigorous competition and must comply with all applicable international laws and regulations, including the U.S. Foreign Corrupt Practices Act. Third Parties must maintain books and records in accordance with international accounting principles.
- Third Parties must ensure that non-public information obtained through the course of their relationship with the Companies are not used for the personal benefit of the Companies' business partners, their Employees or other persons.
- Third Parties may only obtain publicly-available competitive information in compliance with all applicable laws, trade association guidances, Company policies, and confidentiality agreements.
- Third Parties are required to keep all [Confidential](#), proprietary, and trade secret information in confidence at all times. Third Parties must not disclose such information to any unauthorized party, and use it only for the business of the Companies. Third Parties must not communicate externally about the Companies' prospects. Third Parties must not trade in, or provide others with, non-public information that could impact the securities price of the Companies or another entity. Third Parties must not disclose publicly any Confidential or proprietary Information related to any aspect of Company business.

Marketing and Promotional Practices

All marketing and promotional materials and activities must conform to high ethical, medical, and scientific standards, and comply with all applicable laws, regulations, guidelines and industry codes. All such materials and activities must be reviewed by the applicable Company before use or dissemination.

Interactions with Healthcare Professionals or Patients

When interacting with [Healthcare Professionals](#) or patients on behalf of the Companies, Third Parties must conduct such interactions in an ethical manner and in compliance with applicable laws, regulations, guidelines and industry codes.

THE COMPANIES ARE COMMITTED TO CONDUCTING BUSINESS FREE FROM EXTORTION, BRIBERY AND ALL UNLAWFUL, UNETHICAL OR FRAUDULENT ACTIVITY.

Pharmaceutical Industry Laws

- Third Parties, their Employees and any other individual involved with providing services to the Companies must be aware of and shall comply with applicable laws and regulations relating to the pharmaceutical industry, including, but not limited to, all applicable [Federal Healthcare Program](#) and FDA requirements. Any suspected violation of these laws or requirements must be reported to the Chief Ethics and Compliance Officer of Daiichi Sankyo, Inc. or to the Daiichi Sankyo, Inc. Compliance Hotline: 1 (877) 48ALERT (1-877-482-5378) or [dsi.alertline.com](#). The American Regent, Inc. Compliance Hotline is 1-877-482-5378 or [ari.ethicspoint.com](#). Anyone who, in good faith, raises a concern about a possible compliance violation will not be subject to any form of retaliation. As appropriate to the circumstances, any such report must remain confidential and the identity of the individual must remain anonymous.

- Third Parties shall also comply with the good manufacturing practices, good clinical practices and good laboratory practices requirements of their respective countries.
- Consistent with the above, Third Parties must not employ or otherwise allow any individual to provide services to the Companies who is excluded, debarred, suspended, or otherwise ineligible to participate in Federal Healthcare Programs or in federal procurement or non-procurement programs; or has been convicted of a criminal offense that falls within the scope of 42 U.S.C. 1320a - 7(a), but has not yet been excluded, debarred, suspended, or otherwise declared ineligible. In addition, Third Parties will not utilize in the performance of services for the Companies, either as Employees or consultants, any individuals who are on the following lists:
 - HHS/OIG List of Excluded Individuals/Entities (LEIE)
 - General Services Administration's System for Award Management (SAM)
- The Companies comply with all state and federal laws regarding tracking and reporting in connection with [Payments](#) or transfers of value to Healthcare Professionals. Third Parties will report to the Companies all such Payments and transfers of values made on behalf of the Companies.

Pharmaceutical Industry Laws (continued)

- Third Parties must report any [Safety Information](#) related to Daiichi Sankyo, Inc. [Products](#) within twenty-four (24) hours of first becoming aware of an event, to the Contact Center at 877-4-DS-PROD (877-437-7763). Safety Information associated with American Regent, Inc. Products must be reported within twenty-four (24) hours to American Regent's Pharmacovigilance Department at 800-734-9236 or via e-mail at pv@americanregent.com. Safety Information (SI) is defined broadly and includes any [Adverse Event](#) or special situation associated with the use of a DSI Product in humans, whether or not the event is considered drug-related. An Adverse Event includes any unintended experience associated with the use of a drug, any unanticipated exposure, overdose, abuse, misuse, medication error, Product defect, or Product quality complaint, and must be reported whether or not the event is considered to be drug related. Safety Information is reportable to the Contact Center whether it is expected (listed in the Product Prescribing Information) or unexpected (not listed in the Product Prescribing Information). Special situations with or without an associated adverse effect are reportable.

Privacy

Third Parties must safeguard and make only proper use of Confidential and/or Personal Information to ensure that the Companies', Employees, consultants, and patient privacy rights are protected.

Trade

Third Parties must comply with all applicable import and export controls, sanctions, and other trade compliance laws of the country(ies) where the transaction(s) occur(s). Employees must abide by Company policies pertaining to exercising or trading any and all Company stock/SAR/RSU grants.

Animal Welfare

Animals must be treated humanely, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimize distress or discomfort. Alternatives to animal testing must be used whenever scientifically valid and acceptable to regulators.

Honest and Accurate Dealings

Third Parties must not make any false representation in connection with any Company transaction, including, but not limited to, oral misrepresentation of fact, the promotion or utilization of false documentation such as fraudulent or forged contracts, forged letters or destruction and/or other false or inaccurate records.

THIRD PARTIES MUST IMMEDIATELY REPORT ANY THREAT TO HEALTH OR SAFETY WHILE ON COMPANY PROPERTY TO:

- **FOR DAIICHI SANKYO, INC. PRODUCTS, PLEASE CONTACT THE DAIICHI SANKYO INC. CONTACT CENTER AT 877 4 DS PROD (877-437-7763)**
- **FOR AMERICAN REGENT, INC. PRODUCTS, PLEASE CONTACT AMERICAN REGENT'S PHARMACOVIGILANCE DEPARTMENT AT 800-734-9236 OR VIA E-MAIL AT PV@AMERICANREGENT.COM**



LABOR STANDARDS

Third Parties must uphold the human rights of workers and treat them with respect and dignity, including:

Freely Chosen Employment

Third Parties must not use forced, bonded, enslaved, indentured or involuntarily imprisoned labor, nor engage in human trafficking.

Child Labor and Young Workers

Third Parties must not use child labor. Young workers below the age of 18 may only engage in nonhazardous work. All Employees of Third Parties must be above a country's legal age for employment or the age established for completing compulsory education.

Non-Discrimination

Third Parties must provide a workplace that is free of [harassment](#) and discrimination. Discrimination for reasons such as race, color, religion, sex, gender identity, gender expression, sexual orientation, national origin, ancestry, ethnicity, age, disability, pregnancy, veteran status, citizenship status, marital status, genetic information, or other categories protected by law is prohibited.

Fair Treatment

Third Parties must provide a workplace free of harsh and inhumane treatment, including any [Sexual Harassment](#), sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of worker, and with no threat of any such treatment.



THIRD PARTIES MUST NOT USE FORCED, BONDED, ENSLAVED, INDENTURED OR INVOLUNTARILY IMPRISONED LABOR, NOR ENGAGE IN HUMAN TRAFFICKING.

Wages, Benefits, and Working Hours

Third Parties must pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Third Parties must also communicate with workers, in a timely manner, the basis on which they are being compensated, whether overtime is required, and the wages to be paid for such overtime.

Safe Conditions

Third Parties must provide a safe and hygienic working environment for workers and provide appropriate safety equipment and training.

Drug Use

Third Parties will not permit the use, purchase, sale, transfer, or possession of illegal drugs or the illegal use of legal drugs while providing services to the Companies. Third Parties will not permit being impaired or under the influence of any drugs or alcohol during work time while providing services to the Companies.



ENVIRONMENT, HEALTH & SAFETY

Third Parties must operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Third Parties are encouraged to conserve natural resources, avoid the use of hazardous material where possible, and engage in activities that reuse and recycle. The environmental elements include:

Environmental Authorizations

Third Parties must comply with all applicable environmental laws, regulations, guidelines and industry codes. All required environmental permits, licenses, information registrations and restrictions must be obtained, and their operational and reporting requirements must be followed.

Waste and Emissions

Third Parties must have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any generation and disposal of waste, emissions to air and discharges to water with the potential to adversely impact human health or the environment must be appropriately minimized, and properly managed, controlled or treated prior to release into the environment.

THIRD PARTIES MUST COMPLY WITH ALL APPLICABLE HEALTH AND SAFETY LAWS AND REGULATIONS BY PROVIDING A SAFE AND HEALTHY WORKING ENVIRONMENT, INCLUDING ANY LIVING QUARTERS THAT ARE PROVIDED BY THE THIRD PARTY.

Spills and Releases

Third Parties must have systems in place to prevent and mitigate accidental spills and releases to the environment.

Environmentally Responsible Practices

Third Parties must conserve natural resources, avoid the use of hazardous materials where possible, and reuse or recycle appropriate materials.

Third Parties must comply with all applicable health and safety laws and regulations by providing a safe and healthy working environment, including any living quarters that are provided by the Third Party. Other important health and safety requirements include:

Emergency Protection

Third Parties must protect Employees from overexposure to chemical, biological and physical hazards in the workplace.

Process Safety

Third Parties must have programs to prevent or mitigate catastrophic releases of chemicals.

Workers Protection

Third Parties must protect workers from exposure to chemical, biological and physical hazards and physically demanding tasks in the workplace, including any company-provided living quarters.

Emergency Preparedness and Response

Third Parties must identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

Hazard Information

Safety information relating to hazardous materials including pharmaceutical compounds and pharmaceutical intermediate materials must be available to educate, train and protect Employees from hazards.



MANAGEMENT SYSTEMS

Third Parties must use management processes that help facilitate continual improvement and ensure compliance with these Standards of Business Conduct and Ethics for Third Parties, including:

Commitment, Accountability, and Risk Management

- Third Parties must demonstrate commitment to the concepts described in these Standards of Business Conduct and Ethics for Third Parties by allocating appropriate resources.
- Third Parties must have mechanisms to monitor and manage risks in all areas addressed by these Standards of Business Conduct and Ethics for Third Parties.

Legal Requirements

Third Parties must identify and comply with applicable laws and regulations, standards, relevant Customer requirements, and must follow applicable guidelines and industry codes.

Reporting Concerns

All Employees of Third Parties must be encouraged to report concerns or potential illegal activities in the workplace without fear of retaliation, if permitted by local laws and regulations. Third Parties must investigate and take appropriate corrective action, if necessary, without retaliation against the individual who reports the concern or activity.

Fraud Prevention and Reporting

Third Parties must have robust fraud prevention and reporting programs. Third Parties must report promptly to the Companies any potential fraud involving Company business, regardless of materiality.

Business Continuity

Third Parties must develop and implement appropriate business continuity plans for operations supporting Company business. These plans must be designed and kept current to promptly recover and restore partially or completely interrupted critical functions to minimize disruption to Company business and protect the Companies' reputation.

ALL EMPLOYEES OF THIRD PARTIES MUST BE ENCOURAGED TO REPORT CONCERNS OR POTENTIAL ILLEGAL ACTIVITIES IN THE WORKPLACE WITHOUT FEAR OF RETALIATION, IF PERMITTED BY LOCAL LAWS AND REGULATIONS. THIRD PARTIES MUST INVESTIGATE AND TAKE APPROPRIATE CORRECTIVE ACTION, IF NECESSARY, WITHOUT RETALIATION AGAINST THE INDIVIDUAL WHO REPORTS THE CONCERN OR ACTIVITY.



QUALITY

Change Control

Third Parties (including sub-suppliers) must not make any changes in specification, part design, material, manufacturing process, manufacturing location, or registration status, for any goods that the Companies will purchase, without prior written approval from the Company.

Quality / Delivery Performance

- Third Parties must ensure on-time delivery in accordance with the Companies' requirements.
- Third Parties must monitor Product quality performance and demonstrate continuous improvement measured by decreased internal defects, Customer complaints and defects shipped. Third parties must have the capability to respond in a timely manner to all complaints issued by the Companies and their affiliates.

Quality System

Third Parties must have a quality system and Product registration process compliant with all applicable government regulations in the countries in which their Products are produced and/or distributed.

Packaging / Labeling

Products must be properly identified with appropriate label information, ensuring no misidentification will occur and allowing for complete traceability.

THIRD PARTIES MUST MONITOR PRODUCT QUALITY PERFORMANCE AND DEMONSTRATE CONTINUOUS IMPROVEMENT MEASURED BY DECREASED INTERNAL DEFECTS, CUSTOMER COMPLAINTS AND DEFECTS SHIPPED. THIRD PARTIES MUST HAVE THE CAPABILITY TO RESPOND IN A TIMELY MANNER TO ALL COMPLAINTS ISSUED BY THE COMPANIES AND THEIR AFFILIATES.



DIVERSITY IN BUSINESS RELATIONSHIPS

The Companies are advocates of the development of sustainable business relationships with companies that are historically underrepresented in the business world, and we seek to do business with Third Parties that share these objectives.

Support for Diverse Sources

The Companies recognize that diverse talents and perspectives are vital to achieve success, particularly as our company reaches out to serve the needs of all of our Customers. The Companies seek to obtain high quality goods, services and materials from companies that are owned by individuals who are minorities, women, veterans, disabled, and/or lesbian, gay, bisexual or transgender, or others who represent global diversity. Third Parties must do the same.

Support of Economic Development

Third Parties shall make good faith efforts to develop partnerships with qualified small businesses and companies in distressed communities with high unemployment rates and low median household incomes, in order to encourage economic development to make a positive difference.

THE COMPANIES RECOGNIZE THAT DIVERSE TALENTS AND PERSPECTIVES ARE VITAL TO ACHIEVE SUCCESS, PARTICULARLY AS OUR COMPANY REACHES OUT TO SERVE THE NEEDS OF ALL OF OUR CUSTOMERS.



US STANDARDS OF BUSINESS CONDUCT FOR COMPANY EMPLOYEES

In addition to the principles herein, the Companies have Standards of Business Conduct and Ethics for their own Employees, which sets forth the fundamental principles that all Company Employees are required to follow in their work. Accordingly, Third Parties who interact with Company Employees must understand and comply with certain principles relating to conflicts of interest and acceptance of entertainment and Gifts.

Conflict of Interest

The Companies require their Employees to avoid situations that present, or create the appearance of, a potential [Conflict of Interest](#). A Conflict of Interest exists when an Employee's private interests, including personal, social and financial, interfere in any way with the Employee's performance of her or his responsibilities in conducting Company business.

Gifts, Entertainment, Hospitality, Gratuities and Other Favors

Third Parties and their Employees may never accept a Gift that might influence, or be perceived to influence, their business decisions. Accepting Gifts, entertainment, hospitality, gratuities or other favors from entities with which the Companies do business is generally not acceptable because it may pose a Conflict of Interest by implying an obligation on behalf of the Companies.

THE COMPANIES REQUIRE THEIR EMPLOYEES TO AVOID SITUATIONS THAT PRESENT, OR CREATE THE APPEARANCE OF, A POTENTIAL CONFLICT OF INTEREST. A CONFLICT OF INTEREST EXISTS WHEN AN EMPLOYEE'S PRIVATE INTERESTS, INCLUDING PERSONAL, SOCIAL AND FINANCIAL, INTERFERE IN ANY WAY WITH THE EMPLOYEE'S PERFORMANCE OF HER OR HIS RESPONSIBILITIES IN CONDUCTING COMPANY BUSINESS.



PROCEDURES

Training and Certification

- Third Parties must communicate and provide training on these Standards of Business Conduct and Ethics for Third Parties to applicable Employees. Third Parties must have a training program that ensures an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.
- Where required, each Third Party covered by the Standards of Business Conduct and Ethics for Third Parties must have an authorized representative certify that he or she read and understood the Standards of Business Conduct and Ethics for Third Parties and commits the Third Party to these standards.

THIRD PARTIES MUST COMMUNICATE AND PROVIDE TRAINING ON THESE STANDARDS OF BUSINESS CONDUCT AND ETHICS FOR THIRD PARTIES TO APPLICABLE EMPLOYEES.

Monitoring and Compliance

The Companies may audit compliance with the Standards of Business Conduct and Ethics for Third Parties and appoint a third party to conduct an audit. Any violations will be reported to the Third Party's management for their attention and, if appropriate, corrective action. Third Parties must notify the applicable Company's Compliance Department of any reported violations within 48 hours. Third Parties will keep the applicable Company's Compliance Department apprised of the [investigation](#) of such reported violations and any resulting corrective actions, including providing all supporting documentation. It is the intention of the Companies to discontinue their relationship with any individual and/or Third Party who does not comply with this Standards of Business Conduct and Ethics for Third Parties or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

Documentation

Third Parties must maintain documentation that demonstrates compliance with these Standards of Business Conduct and Ethics for Third Parties and applicable laws, regulations, guidelines and industry codes.

Continuous Improvement

Third Parties shall continuously improve their internal control environment by establishing objectives, implementing plans and taking appropriate corrective actions for any deficiencies identified by internal or external assessments, inspections, or management reviews.

THIRD PARTIES MUST MAINTAIN DOCUMENTATION THAT DEMONSTRATES COMPLIANCE WITH THESE STANDARDS OF BUSINESS CONDUCT AND ETHICS FOR THIRD PARTIES AND APPLICABLE LAWS, REGULATIONS, GUIDELINES AND INDUSTRY CODES.



GLOSSARY *Click tabs at the bottom of the page to return to each section.*

Adverse Event	Any unexpected medical occurrence in a subject or clinical investigation subject administered a pharmaceutical Product and which does not necessarily have to have a causal relationship with this treatment. An Adverse Event (AE) can therefore be any unexpected and or unintended sign (including an abnormal laboratory finding, for example), symptom, or disease temporally associated with the use of a medicinal Product, whether or not considered related to the medicinal Product. any unintended experience associated with the use of a drug in humans whether or not the event is considered drug related. Thus, any unanticipated exposures to the drug, with or without associated adverse effects, such as use during pregnancy or breastfeeding, should be reported even if no immediate adverse outcome was reported. Other examples of at risk exposures to a drug include drug overdose, abuse, or misuse, and medication error or inappropriate administration of the drug.
Confidential Information	Confidential information is information that is intended, by the information owner, for a particular audience. This information is for use solely within the company or by its designated partners, and it is limited to those with a “need to know.” Confidential information includes but are not limited to: company private information, confidential Employee information, financial information, corporate strategies, competitor sensitive information, trade secrets, specifications, Customer lists, and research data, and network architectures, or anything covered by a non-disclosure agreement.
Conflict of Interest	For purposes of this Policy, the term “Conflict” or “Conflict of Interest” whether actual or perceived, shall have the meaning of the term “Conflict of Interest” as described in the DS Standards of Business Conduct. A Conflict of Interest may arise in any situation in which an Employee’s loyalties are divided between business interests that, to some degree, are incompatible with the interests of the Company. Employees must avoid any situation where personal interests (or those of relatives, friends, or associates) might conflict, or even appear to conflict, with the best interests of the Company. An “actual” Conflict of Interest is a situation in which a Member who is in a position of trust, has a competing professional or personal interest, in the outcome of a matter or could impair the ability of the Member to perform his or her duties and responsibilities objectively. A Conflict of Interest exists even if no unethical or improper act results. A “perceived” Conflict or Conflict of Interest is an appearance of impropriety that can undermine confidence in the Member by others.

Customer	Any entity involved in the purchasing, prescribing or reviewing for the purchasing or prescribing of a Company Product including, but not limited to, purchasing groups, hospitals, medical schools, nursing homes, pharmacies, risk and non-risk bearing payers (e.g., PBMs, HMOs, PPOs, ACOs, etc.), physician groups, integrated health systems, drug wholesalers and distributors (primary or secondary), and federal and state government entities (e.g., CMS, VA, DOD, Federal Health Insurance Exchanges, etc.). "Customer" also includes any Employees or staff of such entities involved in decisions related to purchasing, prescribing or review of Company Products.
Employee	An individual hired directly by the Company and paid through the Company payroll as an Employee for an ongoing, indefinite period to perform work for the Company on a weekly schedule.
Federal Healthcare Program	Any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States Government (other than the health insurance program under chapter 89 of title 5); or any State healthcare program receiving federal funds, including State child health plans.
Gift	Any and all items of value, including but not limited to: (a) cash (as well as any other cash equivalents); (b) Gift certificates, Gift cards and/or credits (as well as any other equivalents such as vouchers or passes for free hotel stays or services such as massages); (c) any tangible items such as greeting cards, flowers, Gift baskets, food baskets, free or complimentary meals, clothing, etc.; (d) tickets (as well as any other equivalents) for sporting events, concerts, theater and/or related entertainment events; (e) donations made to a charity or memorial fund on behalf of a family member; (f) any similar item(s) that may have a personal benefit purchased using personal funds.

GLOSSARY *Click tabs at the bottom of the page to return to each section.*

Government Official	A member of an agency, instrumentality, subdivision or other body of any national, state or local government, including hospitals and other health facilities owned or operated by a government; regulatory agencies; and government-controlled businesses, corporations, and societies.
Healthcare Professional	All medical professionals including, but not limited to, physicians, medical students, nurses, nurse practitioners, physician assistants, pharmacists, and medical technicians. “HCP” also includes other Employees or staff involved in purchasing or prescribing decisions including, but not limited to, formulary and P&T committee members.
Insider Trading	The buying or selling of stock or securities of any company while aware of information about the Company that is both material and nonpublic.
Investigation	The process undertaken in response to an alleged violation of law, regulation, Company policies, SOBC, or other misconduct to collect facts regarding the nature and Subject of the allegations, and which may include, without limitation, an internal review of data, documents, emails, or other materials (collectively, “records”); and/or an Employee being asked to provide assistance in gathering such records, as well conducting of interview(s) of any witnesses, the Subject, and other persons of interest.
Payment	Any offer, Payment, promise to pay, or authorization of Payment of any money, or offer, Gift, promise to give, or authorization of the giving, of anything of value.

Product or Products	Any pharmaceutical Products or medical devices marketed, distributed and/or promoted by DS in the United States (including Puerto Rico), as well as those Products pending registration.
Safety Information (SI)	For the purposes of this document, Safety Information is defined broadly and includes any Adverse Event or special situations associated with the use of a Company Product in humans, whether or not the event is considered drug related. Thus, any unanticipated exposures to the Company product, with or without associated adverse effects, such as use during pregnancy or breast feeding, should be reported even if there was no known adverse outcome. Special situations with or without an associated adverse effect are reportable. This includes the off-label or unapproved use of a drug.
Sexual Harassment	Another form of Workplace Harassment that affects the dignity of men and women at work. Sexual harassment will not be tolerated under any circumstances. Basing promotions, raises, or desirable job assignments on submission to sexual advances or requests for sexual favors is an example of prohibited conduct that constitutes Sexual Harassment.
Third Party Vendor	An individual or entity who is engaged by the Company to provide service(s) or Product(s) to the Company.
Workplace Harassment	Repeated mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes threatening, humiliating, or intimidating behaviors; work interference/sabotage that prevents work from getting done; and verbal abuse.

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