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1. PURPOSE

The purpose of this policy ("Policy") is to set forth the obligations of Daiichi Sankyo, Inc. ("DSI" or the "Company") employees ("Employees") and Relevant Contingent Workers to report to the DSI Contact Center any relevant safety information (e.g. Adverse Event or potential Adverse Event ("Adverse Event") or a special situation associated with a DSI product, collectively "Safety Information" or "SI"), within twenty-four (24) hours of first becoming aware of the relevant Safety Information.

2. SCOPE

This Policy applies to all Employees of DSI, and those Relevant Contingent Workers including DSI Employees and Relevant Contingent Workers within Daiichi Sankyo Pharma Development ("DSPD") Division, Daiichi Sankyo U.S. Business ("DSUSB") Division, and the U.S. Corporate Division ("USCD"), including, without limitation, global functions within those divisions who perform product or promotional related functions or otherwise interact with Healthcare Professionals (HCPs), Customers, or patients on behalf of DSI. This Policy applies to marketed products manufactured, marketed, co-marketed and/or sponsored by the Company or for which DSI is the authorized licensee (collectively, "DSI Products"). Information on DSI Products can be obtained at: http://daiichisankyo.com/products. Safety reporting for investigational compounds and for events that occur in the course of an investigational study of a marketed compound will follow the procedures defined in the study protocol and other study-specific documents associated therewith.

3. KEY POLICY STATEMENTS/PRINCIPLES

This policy is intended to describe the requirements for the reporting of Safety Information, including Adverse Events and special situations, by Employees and Relevant Contingent Workers.

4. ROLES AND RESPONSIBILITIES

Role	Responsibility
DSI Employees and Relevant Contingent Workers	• Report all Safety Information to the DSI Contact Center ("Contact Center") within twenty-four (24)

	hours of becoming aware of Safety Information associated with a DSI product • Complete annual Safety Information reporting training
Business Owners or designee	• Determine if Contingent Workers meet definition of Relevant Contingent Worker by using Relevant Contingent Worker Assessment Tool found in CSPV-AOP-001 - Determining Safety Reporting Requirements for Contingent Workers • Ensure contracts with Relevant Contingent Workers contain appropriate language requiring Relevant Contingent Workers to report SI to the Company and to receive Safety Information reporting training • Ensure Relevant Contingent Workers receive Safety Information reporting training (through computer-based module, live, classroom, Microsoft Teams, etc. as appropriate) • Retain training documentation of Relevant Contingent Workers as needed for Safety Information reporting training outside of computer-based models that register training
Clinical Safety and Pharmacovigilance Department ("CSPV")	• Maintain CSPV-POL-001 • Support Business Owner in identifying and providing training materials where needed for Relevant Contingent Workers without access to Learning Management System ("LMS")
DSI Compliance Department	• Issue, track, and maintain training completion records for initial and annual Safety Information reporting

	training of Employees and Relevant Contingent Workers with access to LMS
DSI Legal Affairs Department	• Ensure contracts with Relevant Contingent Workers contain appropriate language requiring Relevant Contingent Workers to report SI to the Company and receive Safety Information reporting training

5. POLICY TOPIC AND DESCRIPTION

5.1. Safety Reporting by Company Employees and Relevant Contingent Workers

5.1.1. All Employees and Relevant Contingent Workers must report Safety Information to the Contact Center within twenty-four (24) hours of first becoming aware of an event associated with a DSI Product. The obligation to report Safety Information to the Contact Center is triggered immediately upon becoming aware of the event associated with any DSI Product.

- Upon first becoming aware of Safety Information, the Employee and/or Relevant Contingent Worker must report the event within twenty-four (24) hours to the Contact Center at 877-4-DS-PROD (877-437-7763). Except as described in Section 5.3 of this Policy, reporting of Safety Information by an Employee or Relevant Contingent Worker through any means other than to the Contact Center (including in Insight, DSI's sales force automation system) is expressly prohibited.

5.1.2. Employees and Relevant Contingent Workers must report Safety Information to the Contact Center regardless of whether the individual believes the event has a causal relationship to the DSI Product.

- The determination of whether the Safety Information is, or is not, related to a DSI Product is not to be made by the Employee or Relevant Contingent Worker making the report. Only the Company's CSPV Department, and such other departments and/or individuals that CSPV may engage in this regard, have the responsibility to assess whether a particular reported event constitutes Safety Information under applicable regulations (including any government reporting and the timing/format of such reporting), as well as any further review or dissemination of information as to a particular reported event.
- Additional information for handling internally reported Safety Information of marketed DSI Products and any required

governmental reporting set forth in greater detail in Review, Assessment & Reporting of Adverse Events from Non-Study Sources (SOP 502).

5.1.3. Any report to the Contact Center must include all or as much of the following information as is available and/or which can be ascertained, including:

- Reporter information, including contact details (phone number, mailing address, etc.). The reporter may be a patient, another consumer, an HCP, Customer, or anyone else with knowledge of the Safety Information
- If the reporter is not the treating HCP, obtain the contact information, including phone number(s), for the treating HCP to allow for proper follow-up of the event by CSPV
- Name of the DSI Product and information regarding how the product was used (indication (if available), dosage, duration of use, etc.)
- Patient information, including age, patient identifier (e.g., patient initials or other description), gender, medical history, and contact information (if the person reporting the Safety Information is the patient or the treating HCP) [1]
- Brief description of the Safety Information using as many of the actual words in the original communication as was initially communicated to the Employee or Relevant Contingent Worker as can be recalled
- Date the Safety Information was communicated to the Employee or Relevant Contingent Worker or the date he/she first became aware of the event
- When available, the lot number of the DSI Product the patient used.

5.1.4. Safety Information (SI), as the term is used in this Policy, 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 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. Examples of reportable SI include, but are not limited to:

- A potential Adverse Event including death
- Off-label or unapproved use of the drug
- Drug overdose, abuse, or misuse
- Medication errors or inappropriate administration of the drug: For example, if a drug is supposed to be given twice a day but the prescriber accidentally prescribes once a day
- Occupational exposure: For example, if a health care provider has

[1] For Safety Information involving off-label use, provide any information available from the initial discussion but do not engage in discussion or conversation to obtain such information. If additional information is required, CSPV will obtain.

an accidental needle stick while administering a medication

- Symptoms of drug withdrawal; refer to reference package insert for withdrawal symptoms of the product
- Failure of pharmacological action or lack of efficacy (When a drug is not working as expected)
- Drug-drug, drug-food, or drug-herbal interaction; refer to reference safety information of the product
- Suspected transmission by a medicinal product of an infectious agent: Exposure to an infectious agent during product compounding
- Abnormal lab findings
- Incidents related to product quality or product defect types of complaints
- Falsified medicinal product: This relates to any medicinal product with a false representation of:
  - Its identity, including its packaging and labeling, its name, or its composition as regards any of the ingredients including excipients and the strength of those ingredients
  - Its source, including its manufacturer, its country of manufacturing, its country of origin or its marketing authorization holder; or
  - Its history, including the records and documents relating to the distribution channels used.
- Drug diversion
- Any unexpected outcome, event, or occurrence during the use of a drug, even if perceived as positive (e.g., hair growth, or blood pressure drug lowering cholesterol).
- Pregnancy/exposure in utero
- Any unanticipated exposures to the DSI Product, such as use during pregnancy or breastfeeding

5.1.5. SI must be reported to the Contact Center, regardless of the source.

- Employees and Relevant Contingent Workers must report SI to the Contact Center even if told that the third party has already reported, or will report, the event. Similarly, the Employee or Relevant Contingent Worker must report SI to the Contact Center even if told that it is "not important," or "not to worry about it", etc.
- If a group of two or more Employees and/or Relevant Contingent Workers become aware of SI during an internal meeting, conference, email circulation etc., it must be decided at the time of awareness that one of the Employees or Relevant Contingent Workers will be responsible for reporting the SI to the Contact Center on behalf of the group and provide the names of the Employees or Relevant Contingent Workers who were in attendance at the time of the report. If there is no decision on who will report the SI on behalf of the group, then all Employees and Relevant Contingent Workers who were in attendance must report the SI to

the Contact Center. If there is confirmation that at least one other Employee or Relevant Contingent Worker has reported, then no further report need be made to the Contact Center.

5.1.6. The duty to report SI to the Contact Center arises regardless of where, when, or how the information was brought to the attention of the Employee or Relevant Contingent Worker. Examples include information:

- Learned during a presentation in the office or during a meeting with a vendor, HCP, or Customer
- Brought to the Employee or Relevant Contingent Worker's attention by friends, neighbors, acquaintances, competitors
- Learned from a Social Media Site or other electronic platform
- Discovered spontaneously
- Communicated in person or remotely (e.g., electronically)

5.1.7. There is no penalty for reporting an event to the Contact Center that is determined by CSPV not to be reportable SI. Any doubt about whether an event is or is not reportable SI will be interpreted broadly, consistent with the scope of this Policy and reported to the Contact Center.

5.1.8. Failure to report SI to the Contact Center by an Employee or Relevant Contingent Worker could lead to disciplinary or legal action up to and including termination of employment, contract, services, assignment, or any other remedy as may be appropriate under the circumstances.

5.2. Safety Information Learned on Social Media Sites

5.2.1. DSI defines Social Media ("SM") as the application of mobile and web-based technologies to turn communication into interactive or multi- directional (e.g., two-way) dialogue or use of SM Platforms including, for example, such as Linked In, YouTube, Twitter, Instagram, Facebook, etc. even if comments are not allowed or disabled. SM data consists of any user-generated content that is either, a) propagated by a single user or, b) the product of interaction between one or more users/contributors. SM data exists in various formats such written information, photos, videos, and audio files. SM exchange includes all forms of online publishing, digital media sharing and online discussions in Social Networks, Collaborative Forums, Social Communities, and other bi-directional social interaction technologies, including but not limited to blogs, micro-blogs, wikis, user-generated video, location-based applications, and audio.

5.2.2. Employees and Relevant Contingent Workers must report all SI communicated about Daiichi Sankyo Products that they see or discover on any SM site, whether it is a personal site or official DSI channel.

5.2.3. When reporting SI that is identified on SM to dsus@druginfo.com, include as much publicly available information as possible including:

- Reporter information, including contact details (email address,

phone number, mailing address, etc.).

- Date the SI was identified, as well as the date the actual SM post was published.
- If the reporter is not the treating HCP, obtain the contact information (if publicly available in the post) including phone number(s), for the treating HCP to allow for proper follow-up of the event by CSPV as able, given public information.
- Product name and information regarding how the product was used (indication, dosage, duration of use, etc.).
- Patient (SM user who posted the SI) information, including SM username, age patient identifier (e.g., patient initials or other description), gender, medical history, and contact information (if the person reporting the SI is the patient or the treating HCP).
- Screenshot of the SM post that includes the text of the SI that was posted along with any comments (when applicable).
- Link to the SM post that includes the SI being reported.

5.3. Safety Information Reporting Process Deviation: Handling of Written Documents Addressed to the Company with Potential Safety Information

5.3.1. A written document, including Unaddressed mail, which is discovered by the Company (including but not limited to Legal Affairs, Human Resources, Public Affairs, Regulatory Affairs, Reception, Marketing, Mail Room, etc.) to contain information pertaining to SI involving a DSI Product, must be forwarded, within 24 hours, to CSPV via email (CSPV@dsi.com) by the Employee or Relevant Contingent Worker who receives, discovers or otherwise is in possession of the document.

- A document as described in this Section 5.3 may be in the form of a letter, complaint, scientific article, report, note, delivered by person, mail, fax, email (or any other electronic means) and can come from various sources, including consumers, HCPs, attorneys, journalists, scientists, agencies, public and private organizations, members of the public, etc.
- Additionally, different processes and/or time deadlines may be established for Adverse Event reports provided in connection with legal matters (such as, for example, litigation matters and/or legal claims) as agreed to in writing between Legal Affairs and CSPV. The written memorialization of such agreements will be maintained by the Senior Vice President, General Counsel & Secretary (or that employee's designee) in the official records of Legal Affairs.

5.3.2. Except as expressly described in Section 5.3.1., all provisions of this Policy apply to the reporting to the Contact Center or otherwise to CSPV of SI in written documents (as described herein).

5.4. Exchange of Information with External Partners

5.4.1. All Employees – including, but not limited to the Public Affairs, Marketing, Medical Affairs, Clinical Operations, Sales & Product Supply functions – involved in the approval of contracts with external partners must ensure that Pharmacovigilance (PV)-relevant contracts contain PV provisions or a reference to a separate Pharmacovigilance Agreement (PVA). Employees should ensure involvement of CSPV in the implementation of PV Agreements and for consultation in determining PV relevance.

6. TRAINING EXPECTATIONS

All Company Employees and Relevant Contingent Workers must be trained on the principles contained in this Policy annually. It is the responsibility of each business owner hiring a Contingent Worker to evaluate the work being performed in order to determine if he/she meets the definition of Relevant Contingent worker who requires training under this Policy. The issuing department is responsible for ensuring all applicable DSI Employees and Relevant Contingent Workers complete the required training. In situations where the issuing department proposes to utilize the Learning Management System (LMS) as the vehicle for training DSI Employees and Relevant Contingent Workers who function in department(s) outside of the issuing department, prior approval by the LMS Steering Committee is required. Training may be delivered in one or more of several formats, including, but not limited to, computer-based module, live, classroom, Microsoft Teams, etc., as determined by the issuing department.

7. ACTIVITY OWNER, KEY APPROVAL AND DOCUMENTATION

The CSPV Department is responsible for all aspects of this policy, including updates. The Compliance Department, the CSPV Department, and the Business Owners are jointly responsible for training on the principles contained in this policy. The Compliance Department is responsible for the initial and annual training of all Employees and those Relevant Contingent Workers (as identified by Business Owners and/or CSPV) who have access to the LMS system. CSPV is responsible for supporting the business in the training of all Relevant Contingent Workers who do not have access to the LMS system.

8. POLICY REFERENCES, FORMS AND TEMPLATES

- Determining Safety Reporting Requirements for Contingent Workers (CSPV-AOP-001)
- Receipt, Assessment and Reporting of AE from Non-Study Sources (CSPV SOP 502)
- FDA Guidance for Industry (March 2001) Postmarketing Safety Reporting for Human Drug and Biological Products Including Vaccines [Draft Guidance]
- EMA Guideline on Good Pharmacovigilance Practices (GVP) Module VI (Rev 2) 28-Jul- 2017; EMA/872138/2011 Rev 2

9. DEFINITIONS AND ABBREVIATIONS

9.1. Definitions

Term	Definition

Adverse Event or AE	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 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.
Contact Center	The Company's Contact Center at 877-4-DS-PROD (877-437-7763) or dsus@druginfo.com.
Contingent Workers	Individuals who provide services to the Company subject to a contingency. Typically, the contingency is a temporary need for services for a limited period of time, a select service, or a specific result/outcome. Contingent Workers include agency temporary workers, independent contractors, consultants, vendors, contract workers and fellows.
CSPV	Daiichi Sankyo Inc. Clinical Safety and Pharmacovigilance Department. Email: cspv@dsi.com
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 the review of Company products.
DSI Product(s)	Marketed products manufactured, marketed, co-marketed and/or sponsored by the Company or for which the Company is the authorized licensee. Information on DSI Products can be obtained at: http://daiichisankyo.com/products
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 Pharmacy & Therapeutics (P&T) committee members.
Relevant Contingent Workers	Relevant Contingent Workers include agency temporary workers, independent contractors, consultants, vendors, contract workers and fellows who perform or are involved with product or promotional related functions or who otherwise interact with Healthcare Professionals (HCPs) or Customers on behalf of DSI.

Safety Information	Note: The language above is the regulatory definition of Adverse Event. The Company's reporting process for Safety Information includes both Adverse Events and special situations associated with the use of a drug in humans whether the event is considered drug-related. Please refer to Section 5.1.4 of this Policy for a more in-depth explanation of what is considered Safety Information for purposes of this Policy.
Social Media	The application of mobile and web-based technologies to turn communication into interactive or multi- directional (e.g., two-way) dialogue or use of SM platforms such as Linked In, YouTube, Twitter, Instagram, Facebook, etc. even if Comments are not allowed or disabled. SM data consists of any user-generated content that is either, a) propagated by a single user or, b) the product of interaction between one or more users/contributors. SM data exists in various formats such written information, photos, videos, and audio files.
Unaddressed	Any item received by the Company's Mail Service group which is not addressed to a specific person within the Company.
US or United States	The fifty (50) U.S. States, the District of Columbia and Puerto Rico.

9.2. Abbreviations

Abbreviation	Term
AE	Adverse Event
CSPV	Clinical Safety and Pharmacovigilance Department
DSI or the Company	Daiichi Sankyo, Inc.
HCP	Healthcare Professional
LMS	Learning Management System
P&T	Pharmacy & Therapeutics
PVA	Pharmacovigilance Agreement
SI	Safety Information
SM	Social Media

10. REVISION HISTORY

Revision Number	Description of Change
8	Added Section 5.2 Safety Information Learned on Social Media Sites and Section 5.4 regarding PVAs. Added examples to AE Section.
7	Added Drug Diversion as an AE in Section 5.1.4

6	Added the reference to "Determining Adverse Event Training Requirements for Contingent Workers" (CSPV-AOP-001); Section 5.1.4. included additional example of AE to include, "suspected transmission by a medicinal product of an infectious agent;" and "falsified medicinal product;" Section 5.1.5 added verbiage to address AE reporting when received by Employees or Relevant Contingent Workers in a group setting; Section 5.2.1 updated title from "Deputy General Counsel, Commercial" to "Senior Vice President, General Counsel & Secretary;" Section 8 added reference, EMA GVP Module VI (Rev 2) 28-Jul-2017 as reference to "falsified medicinal product" and definition thereof.
5	Updated format per new template. Added Key Policy Statement/Principles and Roles and Responsibilities per new template.
4	Added methods of training, definition of Relevant Contingent Worker, removed reference to Parsippany and Edison sites and those site-specific document references.
3	Updates Include: Clarification of AE definition in Section 3; changed Section 3.2 from an "exception" to a "deviation" process; and other minor formatting changes.
2	Periodic review complete no changes required.
1	Initial Version-This document replaces RM-POL-001. Updates include: Clarified Scope in Section 2. Clarification of AE definition in Section 3. Delete reference to SOP 501 in Section 3. Delete reference to Edge and add reference to Insight in Section 3. Add definition of Contingent Worker, Customer, and US. Added references to Unaddressed Mail Administrative Operating Instructions in Section 7.

11. APPENDICES

N/A