

Declaration of Compliance

July 1, 2018

As part of its continuing commitment to compliance, Eisai has implemented a comprehensive Corporate Compliance Program (Compliance Program) that is designed to reasonably prevent and detect violations of law and company policy. The Compliance Program incorporates the Office of Inspector General (OIG) Compliance Program Guidance for Pharmaceutical Manufacturers (OIG Guidance) and the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Practitioners and addresses the requirements of the California Health and Safety Code, Sections 119400-119402 (California Law).

Our Compliance Program is dynamic and tailored to meet the unique needs of our company. We regularly review and enhance our policies, training and procedures, as necessary, to meet the changing environment in which we operate. The Company has auditing and monitoring activities and investigative processes to detect violations and ensure that instances of alleged improper conduct are properly reviewed and addressed.

Following due diligence and to the best of its knowledge, Eisai is, in all material respects, in compliance with its Compliance Program as of the date of this declaration. In making this declaration, Eisai is neither certifying nor representing that every employee or agent will always be in full compliance with the Compliance Program. The OIG Guidance does not expect this and recognizes that even effective compliance programs may not entirely eliminate improper conduct by individual employees. Nonetheless, we expect all of our employees to comply with the Compliance Program, and we investigate alleged violations of policy and take appropriate disciplinary and corrective actions, as necessary.

Anyone wishing to obtain a copy of this Declaration can call 1-866-360-8867.