

Charter of Business Conduct

January 17, 2000

We place primary emphasis on patients and their families, we strive to increase the benefits that health care provides them and we conduct our business to meet their diversified health care needs worldwide. We aim to be Human Health Care (“*hhc*”) companies that make a meaningful contribution under any health care system through our business activities around the world.

It is an integral part of our corporate mission that we exercise our business judgment and take action in our business in a timely and proper manner, always in compliance with all relevant laws and ethical standards. Compliance is a cornerstone of the company’s existence and shall be given a top priority in our corporate activities.

We hereby establish our Charter of Business Conduct as a statement of our commitment to compliance. All directors, officers and employees of Eisai entities shall at all times and in all their daily activities act strictly in accordance with this Charter, working to achieve the corporate goals that this Charter defines:

1. As *hhc* companies, we will develop and provide products and services that can contribute to the wellbeing of patients and their families.
2. We will comply with all applicable laws and regulations of each country in which we do business and we will conduct ourselves with a high level of integrity.
3. We will respect the cultures and customs of the countries in which we do business.
4. We will compete in the global marketplace in a fair and open manner.
5. We will respect our relationships with health care providers, stockholders, investors, employees, customers and the communities in which we work.
6. We will promote protection of the environment in all of our business activities throughout the world.
7. We will support appropriate philanthropic activities as part of our corporate contribution to society.
8. We will maintain open and honest relations with political and government entities.
9. We will stand firm against any form of organized criminal activity.
10. We will provide a safe work environment and fair treatment of all employees, respecting the individual rights and dignity of each of them.
11. We will properly manage Eisai corporate information, maintain accurate records and make all required disclosures in a timely manner.