

Influence ethical action. Facilitate open conversation.
Drive success through compliant business decisions.

Leader Integrity

TOOLKIT



hhe
human health care

A Compliance Dialogue for People Managers

Compliance at Eisai means more than doing what is required. It means that behind every action we take, integrity is rooted in all of our decisions. At Eisai, we work hard to ensure our teams have the foundation to make informed business decisions with the help of Company policies and guidelines, as well as business partners with expertise on the laws, regulations, and industry best practices relevant to our work. Our goal is that by engaging in business activities with integrity, we will earn the trust of our customers and business colleagues, ultimately driving our business forward.

It is up to you, our valued leaders, to responsibly incorporate integrity into everyday business decisions.

In Your Back Pocket

All people managers at Eisai are responsible for setting the right tone, leading by example, and championing compliant business practices. To support this effort, the Ethics & Compliance Department has created this Toolkit for your reference.

This Toolkit provides guidance for leading with integrity. It answers frequently asked questions about compliance and provides examples. Prompts are included to help you consider the best way to work with teams to achieve great results in a compliant way.

The more you use the Toolkit, the more value you will find. Your personal leadership and our collective success are enhanced by your continual use of the Toolkit and embodiment of integrity.



Leading with Integrity

Your actions, words, and behaviors matter. Not all managers have the same job description or work the same way, but all managers do have the same responsibilities to be a role model and inspire integrity within your team. Even stretching the truth a little or letting small things slide can impact your team's perception of you as a leader they can trust.

You have the opportunity to shape our Company culture and ensure that we proactively and unambiguously continue to place a high value on integrity.



A Unique Lens

Managers need to look at compliance through a unique lens. You are expected to influence and empower your team to do the right thing each and every day.

You have the ability to foster a culture that embraces integrity as a key driver of performance and success.



Setting the Proper Tone of Integrity

Your team looks to you as a role model of how to act in the workplace. They get cues from you as to what the Company values and how they should behave at work.

Make compliance a priority through your own words, actions, and decisions. Leading with integrity can manifest in various ways, but specific actions managers should take include:

- Promoting open discussion and support for differing opinions or ideas
- Encouraging teams to consider potential risks to the Company and what internal review processes must be followed when developing project timelines
- Modeling and putting your teams in touch with cross-functional subject matter experts to help provide guidance on potential risks and appropriate mitigation measures

- Creating a standing agenda item for relevant topics that may discuss the risks of a given activity or impact integrity at team meetings
- Monitoring expense reports and vendor invoices
- Ensuring your team is well-informed about policies, procedures, and regulations
- Holding team members accountable during performance evaluations and compensation planning

- Celebrating team compliance achievements (for example, completing training on time or 100% HCP contract compliance)
- Respecting team member privacy
- Addressing issues promptly and ensuring your team knows whom to contact when they have a question or concern

Integrity

Integrity is being honest and doing the right thing even when no one is watching. It's valuing open discussion and recognizing that all ideas and opinions are important. Integrity is having the confidence to be accountable for individual and team actions, good and bad. It's showing patience and flexibility, especially when challenges appear.



THINK

Remember that what you do and say not only impacts your team and business partners, but also the patients and families we serve. Remind yourself that no matter someone's position or title, it is important to treat everyone with respect and behave with openness and honesty at all times.



SAY

“Integrity and compliance are important to build trust with our patients, families, and caregivers.”

“Positive clinical results are notable, but never at the expense of patient health and data integrity.”

“Bringing up issues can be tough, but understand that anyone can make a mistake no matter their role. We can partner together or pull in the right people to work through it.”



DO

- Walk the walk. How you engage with your colleagues and external partners is what your team will seek to emulate.
- Discuss how following policies, completing forms, and adhering to processes actually makes their job more efficient because it avoids ambiguity and unnecessary back-and-forth.
- Empower your teams to develop reasonable timelines for projects to ensure there is time to follow processes and to have meaningful review of materials.
- Include compliance performance as a part of every midyear and annual review. Allow teammates to show you how they acted with integrity in everyday situations.
- Promote the identification and mitigation of risk as everyone's responsibility.
- Say thank you for following policies and procedures with ease.

You are reviewing expense reports and notice some large charges potentially out of policy but are not sure. The charges don't impact your budget and you figure Finance will flag them on the back-end, so you approve the expenses.

What Would You Do?

Leadership

Leadership is influencing and maximizing the impact of others toward compliant business practices. Being a compliant leader means setting the bar high and having others follow you to do the same. A leader is accountable for establishing an ethical culture from the start, setting the foundation in which all other decisions are made.



THINK

Remember that it is your responsibility to take ownership of your team's activities and think through potential training points or questions your team may have. The Legal and Ethics & Compliance Departments are here to help guide and advise, but all activities, and any risks associated with it, are ultimately owned by the business.

Refresh your knowledge of our Compliance Handbook and policies. Aspire to have a compliance mindset and be a role model of compliant behavior every day. Find ways to emphasize a culture of compliance within your team and know that senior leadership will support you in this endeavor.



SAY

“Those are some interesting points that you have raised; let's discuss the approach that we want to take. We might need to engage other stakeholders to ensure that we're proceeding in a compliant manner.”

“A competitor recently settled with the U.S. government for millions of dollars related to allegations of corruption. Let's remind ourselves of the importance of our anti-corruption processes and procedures, particularly in our growing global markets and interactions with regional third parties.”



DO

- Talk about integrity and compliance as a regular part of business planning.
- Consult others and truly listen to their opinions. Talking through short and long-term consequences of decisions often will lead to better decision making.
- Seek new information and perspectives.
- Coach your team or provide feedback around compliance risks.
- Address potential policy violations in a timely manner.
- Promptly raise concerns to the appropriate people or channels.

Training

Training is developing a knowledge foundation in yourself and your team. It's gaining information about relevant regulations and Company policies and procedures in order to improve productivity and performance. It may include on-the-job guidance, coaching soft skills to guide compliant conversations, or tailoring specific experiences or roles so that team members learn new skills.



THINK

Employees who are more familiar with Company policies, procedures, and guidelines are able to act efficiently and effectively. Training provides information and practice opportunities leading to confident and compliant decision making and execution. Training provides a strong foundation that avoids unnecessary communication in order to clarify policies or determine the correct next step. It helps avoid confusion and delays when executing business plans.



SAY

“Timely completion of your training requirements is one of Eisai’s performance expectations.”

“Make sure you fully understand the training on interactions with HCPs and let me know if you have any questions. These interactions are very important and highly regulated. Companies can get in trouble if they don’t get it right. This training helps you understand your responsibilities and the Company’s expectations when interacting with HCPs, protecting all of us.”

“One day a month, spend some time browsing Eisai Connections, eDOCS, and the Learning Management System for policy and learning content. There are so many resources, policy guides, and even fun interactions that will improve the way in which you work.”



DO

- Get to know your Compliance Business Partners. Ask them what training resources are available for different topics. Be in tune with the needs of your team and suggest areas of additional training that may be needed.
- Tell your team about when you complete compliance training and specific details about what you learned. Review LMS notifications and follow up with your team if they are overdue on their trainings.
- Execute business plans with complete confidence and compliance with Company policies due to attention to and internalization of training.
- Review relevant policies as a group. If one person didn’t know something, there are likely others too.

Oversight

Oversight is reviewing, monitoring, and supervising behavior. It's taking watchful care of projects and work efforts. Oversight doesn't get involved in every action, but rather makes sure the overall process is being followed, concerns are being addressed, and value is being achieved compliantly.



THINK

Consider yourself a coach on Eisai's processes relevant to your function. You want to share best practices, guide behavior, observe and monitor, and correct when necessary. To help prevent potential issues, be alert to signs of behavior that may indicate that there may be a lack of clarity amongst the team. Then, address behavior and ensure timely raising of concerns. Not knowing is not an excuse for non-compliance.

Understand that Eisai has a performance objective for all employees tied to compliance.



SAY

“I know that you are taking on a new role with the team. Have you completed the new training requirements and do you have any questions about the roles and responsibilities? How can I help you gain a better understanding?”

“These contract requests haven't been signed by the HCP. The event can't happen until they do. How can I help you make sure this is a priority?”

“I see that you are planning to hold an Advisory Board with multiple HCP stakeholders. Please be sure that you are following all necessary processes to ensure the activity is completed in compliance with Eisai policy. Let me know if I can help in any way.”



DO

- Hold employees accountable for deficient compliance behaviors during performance evaluations or recognize them for behavior that champions compliance when compensation planning takes place.
- Evaluate business plans to flag any potential compliance concerns or activities not consistent with Eisai policies and procedures.
- Place a high standard for your team on compliance with regard to privacy and security matters. Ensure security assessments are completed when required, emails are encrypted if necessary, and emails that include personally identifiable information (PII) or sensitive information are not unnecessarily forwarded or shared.
- Observe team members in action and seek learning opportunities.

You are a new manager and receive a request from your team to approve a business activity. This is the first time you are seeing this activity and the team tells you we have been doing this activity for a long time and that approval should be quick.

What Would You Do?

Cultivate Compliance Culture

Cultivating a compliance culture is the process of creating and enhancing expectations and motivation for teams to own and embrace an approach that embodies integrity, and promotes cooperation with Compliance guidelines. This may include daily interactions that stimulate the team's ability to do their jobs consistent with compliance goals and instill a sense of pride in achieving those goals.



THINK

Building a compliant team involves developing and fostering a supportive environment. This is an environment where people embrace learning, listen to one another, willingly collaborate, and collectively own responsible and informed decision making. A compliant team sees compliance as an inherent and collective responsibility.



SAY

“Great job today in redirecting conversation back to the business need for the consulting agreements. They are never to be used to induce or reward the use of our product. You handled that interaction with confidence and clarity.”

“I’m not clear on the ins and outs of the Conflicts of Interest Policy either. I’ll connect with the Compliance team and share insights in our next meeting.”

“I hear your frustration that there is a process to follow. It’s critical that we don’t cut any corners though. Compliance processes protect us from unnecessary risk.”



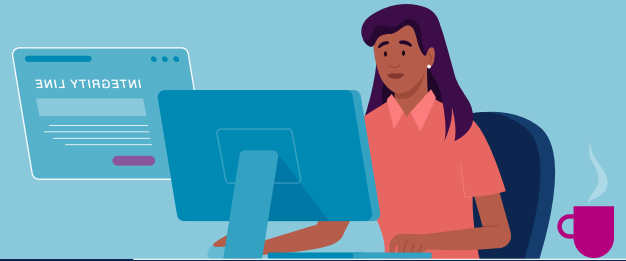
DO

- Recognize and reward compliant behaviors that demonstrate integrity.
- Share links to Compliance resources regularly.
- Respect your team as individuals and foster an environment where people feel comfortable questioning an approach or seeking clarity.
- Encourage open dialogue and transparency. Leave your office door open or Teams chat available. Have regular one-on-one meetings with team members and allow time for them to express questions and concerns without judgment.

One of your team members finds themselves in a tight spot. She unfortunately made the wrong choice to move forward with a non-compliant HCP engagement and proactively comes to you for guidance on what to do next.

What Would You Do?

Two-Way Communication



Lines of communication should always remain open; both between you and your team and between you and your Compliance, HR, or Legal Business Partners. Feel empowered to ask questions, report concerns, or seek clarification for compliance guidance. Failure to act within Eisai's ethical standards may damage our business, reputation and ultimately patients.

Allow and promote your Compliance Business Partners to have a seat at the table. When determining strategic entry into a new marketplace, when you have questions or doubts about the best way forward or need to seek clarification on a policy or procedure, when a business decision simply doesn't feel right—Compliance is here for you and for Eisai. Reach out anytime.

If you are unsure or believe that something does not comply with relevant laws, regulations and Eisai's policies, procedures, and ethical standards, contact Compliance for more information or to seek guidance.

Get In Touch

[Ethics & Compliance Department](#)

[Japan Global Compliance Department](#)



Eisai
Integrity
Line
1.800.467.1391
EisaiIntegrityLine.com

Resources

[Compliance Website](#)

[Eisai Compliance Handbook](#)

[Eisai's Employee Handbook](#)



ETHICS & COMPLIANCE

Integrity: Rooted in all we do



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