

Corporate Responsibility Corporate Policy

Introduction

Shire is committed to the search, research, development and marketing of pharmaceutical products for the treatment and prevention of diseases and the improvement of health of people who suffer from these disorders, throughout the world.

We conduct our business based on our values - integrity, and respect, customer focus, global teamwork, openness and innovation and excellence in execution.

We care for the interests of those with whom we have relationships – our patients, our customers, our suppliers, our shareholders, our employees, the environment and the communities where we conduct our activities.

The operation of a profitable business is a priority and that means investing for growth as well as providing returns to our shareholders. To achieve this, Shire recognises that we need to operate in a sustainable manner and therefore have adopted core principles to our business operations as set out within this Corporate Responsibility Policy. It is intended that these principles will provide a framework for both managing risk and maintaining Shire's position as a good corporate citizen but will also facilitate the setting of goals to achieve continuous improvement.

Shire's Corporate Responsibility (CR) actions are directed and monitored by the company's CR Committee. The members of this Committee represent the key functions and areas of the business that have greatest impact on Shire's CR approach. The Chairman of the CR Committee is a member of the Board and has the responsibility to keep Board members apprised of Shire's CR progress and any associated risks.

Corporate Governance

Shire is committed to high standards of corporate governance and supports the provisions and principles set out in The Combined Code on Corporate Governance issued by the UK Financial Reporting Council in July 2003.

As a NASDAQ company we are subject to the rules of the Sarbanes-Oxley Act and to comply with Section 404 of that Act, Shire, with all Securities Exchange Commission (SEC) regulated companies, reviews its material financial reporting processes and then documents, reviews and tests all material internal controls over our SEC financial reporting to ensure that these operate effectively.

Code of Ethics

The Company is committed to the maintenance of high ethical standards in its dealings with all persons with whom it is involved. The Group's Code of Ethics applies to all Directors and employees and is available on our website. View The Group's Code of Ethics.

Engagement with Stakeholders

For Shire CR extends to all areas of society which our business can affect; shareholders with whom we are committed to maintaining constructive relationships,

our employees, the communities in which we run our business, the supplier companies that we partner, the physicians who prescribe our medicines and the patients whose lives we directly impact as well as their care providers and support groups. We engage in regular dialogue with these stakeholders to ensure we understand their needs and views and to ensure we are undertaking the right actions to satisfy them.

Workplace

We adopt a policy of equal opportunities in the recruitment and engagement of staff as well as during the course of their employment. We promote the best use of our human resources on the basis of individual skills and experience matched against those required for the work to be performed.

The importance of investing in our employees is recognised and as such we provide opportunities for training and personal development and encourage the involvement of employees in the planning and direction of their work.

Shire recognises that commercial success depends on the full commitment of all its employees and commits to respecting their human rights, to provide them with favourable working conditions that are free from unnecessary risk and to maintain fair and competitive terms and conditions of service at all times.

Health and Safety at Work

Shire takes Occupational Health & Safety very seriously. We understand that successful Health and Safety management involves integrating sound principles and practice into our day-to-day management arrangements and that good performance levels are achieved by the collaborative effort of all employees. To ensure improved efficiency and performance, the management of these matters has been incorporated within the company's integrated Environment, Health & Safety (EHS) Management System. Please see EHS section below for further details

Human Rights

We believe in the value of employing people with a diverse range of cultures and backgrounds and we support the UN Universal Declaration of Human Rights and recognise the obligation to promote universal respect for an observance of human rights and fundamental freedoms for all, without distinction as to ethnicity, origin, religion, gender, language or disability.

Drug Development

Animal Testing

Animal studies are essential to characterize the biological actions of new drugs and to safeguard the volunteers and patients involved in clinical trials. For these reasons, regulatory authorities around the world require pharmaceutical companies to thoroughly evaluate new products in animals during the drug development process. Shire is committed to the principle of the 3Rs in its use of experimental animals: Reduction (of the number of animals used), Replacement (with alternate methods such as cell culture) and Refinement (of the techniques), as advances in science permit.

Shire's use of animals in research is closely monitored and Shire is sensitive to the well-being and humane treatment of animals. We endeavor to ensure that appropriate standards of animal welfare and ethics are employed by Shire and any Contract Research Organizations that carry out programs of work on our behalf.

Customers

Shire is a specialty pharmaceutical company that focuses its scientific and commercial efforts toward the specialty physicians who treat central nervous system, gastrointestinal and genetic disorders. By design, the specialty pharmaceutical model allows the efficient use of resources to bring value to physicians, patients and caregivers through distinctive medicines and effective education programs. Unlike some of our competitors, we are able to organize our work around select therapeutic areas and rapidly identify, develop and register promising drug compounds to treat disease.

Specialist doctors are our key customers and we focus intently on the development of strong relationships with them and with patient groups and key opinion leaders through the provision of data and information on the therapeutic areas in which we specialize. In our business dealings Shire undertakes to:

- respect the rule of law of the country within which we operate
- promise only what we expect to deliver, make only commitments we intend to keep, not knowingly mislead others and not participate in or condone corrupt or unacceptable business practices;
- help educate patients and health professionals about the diseases in which we specialize;
- respect the privacy rights of our customers, whether patients or health professionals;
- provide products consistently that are safe for their intended use; and
- not give or receive bribes in order to retain or bestow business or financial advantages.

Ethical Marketing, Selling and Professional Support

Our Sales, Marketing and Medical Science Liaison (MSL's) professionals are given thorough training on local regulations and Shire's standards. We strive to uphold the most stringent adherence to commercial regulatory requirements and we operate within industry promotional guidelines for each country in which it operates.

In the UK we comply with the ABPI Code of Practice for Promotional Materials and have a rigorous internal approval system including Medical and Regulatory department approval to ensure compliance. In the US we have a robust process in place to assure compliance with the Food and Drug Administration regulations regarding promotional activities and have adopted policies and programs consistent with those recommended by the Office of Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers.

Patient Education and Assistance Programs

Shire seeks to ensure patients' and health care professionals' appropriate use of our products for the labeled indications received from regulatory bodies and we strongly condemn the misuse and abuse of our medicines. Patient education materials are designed to inform patients of the risks and benefits of taking medicines, for the appropriate purpose and medical condition they've been prescribed, in easy to understand language and format. Should there be a question or a problem with taking any medicine, the patient is strongly urged to seek medical attention from their doctor or healthcare professional.

Within the U.S., Patient Assistance Programs (PAP's) for Shire products are provided as a safety net for pre-qualified patients who experience an interruption in the administration of their drug therapy or don't have access to drug therapy. For a limited period of time, Shire will make available certain products free of charge to patients under the terms and conditions of the PAP. At some point in time, when a patient demonstrates the ability to pay or has access to a prescription drug benefit program, the intent would be to transition the patient from Shire's PAP.

Customer Service

Customer service requests or complaints are systematically referred to our Customer Service Department or Medical Information departments as appropriate with the intent to resolve any issue with appropriate internal contacts or actions. The Customer Service and Medical Information Departments are well trained and they seek to improve continuously the service, standards and methods our customers have come to expect from Shire.

Community

Shire has the aim that communities in which we operate should benefit directly from our presence through the wealth and jobs created, and the investment of our time and money in the community.

Shire adopts clear parameters as to the charities it chooses to support favouring projects and causes that reflect corporate values and priorities. In addition, our core business of specialty products in the therapeutic areas we focus on is for the benefit of many people throughout the world.

We encourage and support employees with their own activities within the community, by allowing time off during working hours and contributing or matching their own fund raising efforts for a variety of charities.

For more information see our Community Policy

Environment, Health & Safety

We firmly believe that good environment, health & safety (EHS) practice is a key component in achieving excellent Company performance and making Shire a world-class organization. It is also crucial in our aim for continuous business improvement and must form an integral part of our business planning.

It is essential that Shire and our employees comply with relevant standards in those countries where we operate. However, to achieve our aims we must regard

compliance with local health, safety, and environmental legislation as a minimum standard, to be exceeded where reasonably practicable.

To support these aims, Shire has put in place an organization that will ensure environment, health and safety issues are addressed at the highest levels of the Company and that the necessary elements of a comprehensive EHS Management System are implemented, monitored, and regularly reviewed. This requires the collaboration of every employee within Shire and the endorsement of our EHS principles within our supply chain.

Our EHS Management System is based on the principle that all accidents are preventable. We will, therefore, actively engage in an attempt to identify all potential hazards and evaluate all the associated risks in order to eliminate or reduce them to as low a level as is reasonable. On the basis of these assessments, any necessary procedures will be developed to manage the risks. Measurable objectives will be set annually for environment, health & safety performance, and resources will be provided. The performance measures will include both lead and lag indicators.

A range of system elements including incident reporting & investigation, workplace inspections, and independent EHS audits will be used to monitor achievement of the objectives. Based on the results of the monitoring, this policy and the EHS Management System will be reviewed and modified where appropriate.

Although achieving these objectives will require the effort of all levels of the organization, the commitment of the highest levels of management to achieving EHS excellence is key in ensuring our success in eliminating employee injury and environmental damage.

Supply Chain

Shire recognizes that the suppliers we do business with make an essential contribution to the success of our company. Shire's goal is to collaborate with its key suppliers on an arms'-length basis as commercial partners to ensure the highest level of quality, service, and alliance with our values. We expect our suppliers to use well-established Good Manufacturing Processes (GMP), Standard Operating Procedures (SOP), as well as to comply with all legal and regulatory requirements, including environmental health and safety standards, diversity, and human rights.

Shire has an intricate supply chain. We recognize that suppliers in these key strategic relationships are the contract manufacturers of Shire medicines, suppliers of our intermediate ingredients, and packaging companies who are putting the Shire Label on our product. As part of this program, we will monitor their performance, utilizing various sources and methods, such as surveys, public information, and site visits. Shire may conduct a Quality or EHS evaluation of our key suppliers, which is based on the level of integration in the operation, the type of business, and the nature of the relationship.

Shire endeavors to work with our suppliers to share best practices, improve services, and contain costs, as well as to adhere to EH&S standards, and to be good corporate citizens.

Quality Assurance/Materials Management has responsibility for visiting contractors to monitor production of our supplies. The criteria by which their performance is measured is set out in our SOP's. We not only monitor production of our supplies but

also monitor the regulatory GMP standards being applied at each site, via regular audits