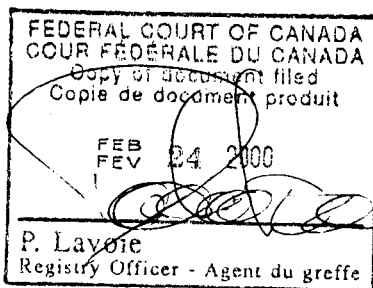


IN THE FEDERAL COURT OF CANADA
TRIAL DIVISION
(AT TORONTO)

BETWEEN

HER MAJESTY THE QUEEN

- and -



TAKEDA CHEMICAL INDUSTRIES, LTD.

Accused

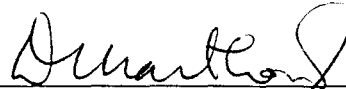
INDICTMENT

THE ACCUSED stands charged:

1. THAT it did, between May 23, 1991 and November, 1995, the exact dates being unknown, in various locations outside Canada, unlawfully conspire, combine, agree or arrange with BASF Aktiengesellschaft, Merck KGaA and F. Hoffmann-La Roche Ltd, the one with the other or others of them, together with a person or persons known or unknown, to prevent or lessen, unduly, competition in the production, manufacture, purchase, barter, sale, storage, rental, transportation or supply of a product, namely, vitamin C, in Canada, contrary to paragraph 45(1)(c) of the *Competition Act*, R.S. 1985, c. C-34.
2. THAT it did, between July, 1991 and Fall of 1995, the exact dates being unknown, in various locations outside Canada, unlawfully conspire, combine, agree or arrange with BASF Aktiengesellschaft, and F. Hoffmann-La Roche Ltd, the one with the other or others of them, together with a person or persons

known or unknown, to prevent or lessen, unduly, competition in the production, manufacture, purchase, barter, sale, storage, rental, transportation or supply of a product, namely, vitamin B2 (riboflavin), in Canada, contrary to paragraph 45(1)(c) of the *Competition Act*, R.S. 1985, c. C-34.

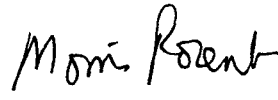
Dated at Ottawa, this 11th day of February, 2000.



D. Martin Low, Q.C.
For the Attorney General of Canada

I hereby consent to the preferment of this indictment pursuant to section 577 of the Criminal Code.

Dated at Ottawa, Ontario this 17th day of February, 2000.



Morris Rosenberg
Deputy Attorney General of Canada

No. T-

**FEDERAL COURT OF CANADA
(TRIAL DIVISION)**

BETWEEN:

HER MAJESTY THE QUEEN

- and -

TAKEDA CHEMICAL INDUSTRIES, LTD.

Accused

INDICTMENT

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