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1. PURPOSE

The purpose of the Anti-Corruption Policy is to ensure compliance with all Anti-Corruption and Anti-Bribery laws and regulations.

2. SCOPE

This Policy applies to all Perrigo Personnel, including employees, temporary employees, contractors, consultants, operating groups, subsidiaries and departments worldwide.

Violations of this Policy are serious, will be investigated, and may result in disciplinary action, up to and including separation of employment or termination of contract. Additionally, under Anti-Corruption and Anti-Bribery laws, both Perrigo and its employees can be held liable for violations and can be punishable by imprisonment and/or fines.

3. TERMS AND DEFINITIONS

For the purposes of this Policy the following terms and definitions apply:

Bribery	The offer or promise of an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behavior of someone to obtain or retain a business advantage.
Corruption	Corruption is any unlawful, unethical, or improper action or breach of trust undertaken for the purpose of personal,

	commercial, or financial gain. Corruption includes activities like Bribery.
Facilitation Payments	Facilitation Payments are payments (non-published fees) made directly to officials for the purpose of expediting routine, non-discretionary official acts (e.g., processing permit applications, issuing driver licenses, visas, or passports).
Gifts	The benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return.
Government Official (GO)	For the purpose of this Policy, a Government Official includes any: <ul style="list-style-type: none"> • person acting in any official capacity on behalf of a government agency, department or instrumentality such as a customs agent, inspector or regulator • employee of a state-owned or controlled medical facility • employee of a state-owned or controlled company such as an employee of a state-owned retail outlet or financial institution • person or officials representing a political party • candidate for a political office • individual who may be acting on behalf of a government (e.g., consultant or engineer)
Healthcare Professional (HCP)	An individual who is licensed to prescribe or dispense medicines, who is in a position to recommend or refer a health-related product or service or who has significant input or influence on prescribing, purchasing or formulary decisions. Common examples of HCP include physicians, surgeons, dentists, veterinarians, psychiatrists, nurses, pharmacists, medical directors, etc.
Healthcare Organization (HCO)	An organization of people, institutions, and resources that deliver healthcare services, conduct healthcare research, training, is influential in establishing treatment protocols or affecting prescription habits. Common examples of HCO include hospitals, medical schools, laboratories & diagnostics clinics, entities that purchase pharmaceutical products, etc.
Kickback	A Kickback is an illegal payment intended as compensation for preferential treatment or any other type of improper services received.
Lobbying	Lobbying describes interactions with Policy makers and other external stakeholders with the intent to represent Perrigo's perspective in the Policy making process.
Political Contributions	Political contributions are monetary or non-monetary (e.g., uses of resources, facilities, endorsements, etc.) contributions to support political parties, politicians or political initiatives.
Third-Party	A Person or legal entity that provides products/services to or on behalf of Perrigo.

4. PROHIBITED CONDUCT

Perrigo Personnel are not permitted directly or indirectly (through a Third-Party) to offer, make, promise, request or accept a Bribe, provide Kickbacks or otherwise provide any improper payment, incentive or gift in connection with Perrigo's business.

4.1 BRIBES AND ALL FORMS OF ILLEGAL PAYMENTS

Perrigo employees must not attempt to improperly influence individuals to gain a business advantage. The following behaviors are strictly prohibited:

- Giving or accepting Bribes, including offers, promises, incentives, gifts, money or anything of value that are given with the intent to influence or reward any person or entity. Some examples are:
 - Paying a Bribe or Kickback to a Third-Party in order to win a contract with that entity
 - Promising a customs agent, a “reward” to reduce the customs duties and sales tax
 - Paying for an official to stop in Las Vegas on his/her way to certify one of our facilities
 - Paying a non-published expediting fee to an agent in order to expedite the approval/processing of a new product registration
- Kickback agreements with any person or entity – including clients, vendors, subcontractors or other Third-Parties – in a position to benefit any employee or Perrigo
- Making or promising a political or charitable contribution in order to gain influence or reward any person or entity in a position to benefit any employee or Perrigo

Employees are also prohibited from receiving Bribes, Kickbacks, illicit payments, benefits of any kind or gifts that are greater than nominal value from a person or entity conducting or wanting to conduct business with Perrigo.

4.2 FACILITATION PAYMENTS

While Facilitation Payments may be accepted as “a cost of doing business” in some countries, they may be illegal and counter to our values. They are prohibited by this Policy unless the circumstances involve an imminent threat to the health, safety or welfare of a Perrigo employee.

If a Facilitation Payment is made as a result of an imminent threat, the payment must be:

- for the sole purpose of ensuring personal safety;
- reported as soon as possible to the employee’s supervisor and the Legal Department; and
- accurately recorded in Perrigo’s financial books and records

4.3 GIFTS, HOSPITALITY AND ENTERTAINMENT

Anti-corruption and Anti-Bribery laws are not limited to cash payments. Giving or receiving gifts, hospitality and entertainment are examples of other “benefits” that may also be prohibited.

Gifts must never be offered/ received when:

- they are above nominal value (see the FAQ resources for more information)

- applicable local laws or industry codes restrict any type of gift giving, even for nominal value items (e.g., gifts to Government Officials)
- they create a real or perceived conflict of interest or affect you/or our business partner's judgement or decision making
- the purpose of providing a gift is not properly documented and in line with the established guidelines for purchasing, approval, and proper reporting

Hospitality (meals, lodging, transportation) offered must always be business related, modest and must never be provided with the intention of influencing business decisions.

If anyone ever directly or indirectly solicits any type of payment mentioned above from you, politely decline and contact Perrigo's General Counsel or Global Compliance & Privacy (Global.Ethics@perrigo.com) for assistance.

You may use the standard "Letter for Returning Inappropriate Gifts" template (section 15. RELATED DOCUMENTS) and document the return of the gift by e-mail to Global.Ethics@Perrigo.com.

5. INTERACTIONS WITH GOVERNMENT OFFICIALS

Dealing with Government Officials (GOs) is not the same as dealing with private parties. This is true whether the government is acting as a customer, a supplier, a consultant/service provider or a regulator.

Business courtesies, hospitality and small gifts of nominal value that might be appropriate when you are dealing with private parties, like paying for lunch or dinner, are not appropriate or legal when you are dealing with GOs. In addition, the laws of most countries usually prohibit the payment, promise, offer or authorization of money, gifts or other items of value to influence Government Officials or to secure any improper business advantage.

For these reasons, our Policy is clear: we do not, either directly or indirectly through a consultant or other Third-Party intermediary, give, pay, offer, promise or authorize the payment of money, favors, employment opportunities or anything else of value to a GO to influence GOs or to seek any improper business advantage.

However, in the course of business it may be proper for an employee to pay for or reimburse a foreign GO for meals, hospitality, transportation, or lodging expenses associated with product promotion or contract performance activities. These types of payment are only allowed if they meet all the following criteria:

- Permitted under U.S. and local laws
- In compliance with the Global Travel and Expense Policy and any other applicable Policy
- Pre-approved in writing by the Legal Department

All approved payments must be accurately recorded in Perrigo's books and records.

6. INTERACTIONS WITH HEALTHCARE PROFESSIONALS & HEALTHCARE ORGANIZATIONS

Our interactions with HCPs/HCOs must never be used as an incentive, or as a reward to secure any improper business advantage for Perrigo.

In certain cases, an HCP employed by or acting on behalf of a government institution (e.g., hospitals, pharmacies, associations and organizations) may be considered a GO and additional restrictions may be applied (section 5. INTERACTIONS WITH GOVERNMENT OFFICIALS).

For more information on the standards and procedures that govern interactions with HCPs and HCOs, please refer to the “Policy on Interactions with Healthcare Professionals and Healthcare Organizations”.

7. ENGAGING WITH THIRD-PARTIES

To ensure that Perrigo does business with reputable, honest and qualified Third-Parties, Perrigo Personnel must comply with the “**Third-Party Due Diligence Manual**” located on Inside Perrigo/Global Policies.

When working with Third-Parties, Perrigo Personnel must closely monitor their conduct and be alert for warning signs of corrupt behavior. Examples of such warning signs include:

- Excessive commissions or fees being charged by a Third-Party
- Unreasonably large discounts being given to a Third-Party agent or reseller
- Consulting agreements that include vaguely described services
- A Third-Party that represents it is in a particular line of business, but is later discovered to be in a different line of business
- Requests for payment to a bank account in a country other than where the Third-Party operates or to a nominee
- Requests for reimbursement for unexplained or vague expenses, or insufficient or irregular documentation provided in support of invoices
- A Third-Party that is able to obtain non-public information from government sources
- A Third-Party that is related to or closely associated with a Government Official

8. MERGERS, ACQUISITION AND JOINT VENTURES

Before entering into an agreement for mergers, acquisitions or joint ventures, appropriate Anti-Corruption due diligence must be completed.

9. POLITICAL CONTRIBUTIONS

Perrigo supports each employee’s individual right to participate in the political process. Perrigo personnel may make contributions of personal time or personal money to the political process so long as any such contribution does not interfere with their responsibilities at Perrigo or violate any applicable laws. Perrigo personnel may not use Perrigo funds for Political

contributions. In some cases, even the work time of Perrigo Personnel may be considered the equivalent of a Political Contribution by Perrigo. Therefore, Perrigo Personnel will not be paid by Perrigo for any time spent running for public office, serving as an elected official, or campaigning for a political candidate.

10. CHARITABLE DONATIONS

Perrigo only makes charitable donations that are legal under the applicable Anti-Corruption laws. All charitable donations must follow the local or the Perrigo Foundation review and approval process.

11. LOBBYING ACTIVITIES

Perrigo conducts legitimate Lobbying and information activities to promote legislation, regulations and government Policy favorable to our interest, both directly and indirectly through industry associations. All lobbying activities are managed by the Legal Department.

Perrigo reports all Lobbying information as required to the appropriate authorities.

12. RECORDKEEPING

Perrigo's books, records and accounts must accurately and fairly reflect all financial transactions and disposition of assets. All entries should reflect the true nature, amount and purpose of all monies spent.

Perrigo Personnel are prohibited from establishing any kind of fund not properly accounted for or other pool of money that are not on Perrigo's books.

13. REPORTING POTENTIAL MISCONDUCT

If you believe that this Policy is being or may be violated, you are required to report it through the following Direct or Indirect reporting channels:

Direct reporting channels:

- your Supervisor, Manager or a Senior Employee, your Human Resources Department, Global Compliance & Privacy (Global.Ethics@perrigo.com), or a member of the Legal Leadership team

Indirect reporting channels:

- the online reporting tool at Ethicshotline.Perrigo.com
- the 24/7 hotline (local telephone numbers available at Ethicshotline.Perrigo.com)

If you wish to submit your **report anonymously**, you may do so by selecting any of the Indirect Reporting channel options which are available in all local languages where Perrigo has operations.

All complaints involving any senior leader, site leader, country leader, any member of a management team and any Executive Committee member must be immediately reported.

Perrigo prohibits retaliation against individuals who, in good faith, report possible misconduct or provide information related to investigations. Retaliatory acts may lead to disciplinary action, up to and including separation of employment or contract.

14. CONTACT INFORMATION

All questions about the requirements of any applicable Anti-Corruption law or regulation, should be addressed to:

- Global Compliance & Privacy (Global.Ethics@perrigo.com) or
- Legal Department (Legal@perrigo.com)

15. RELATED DOCUMENTS

Please refer to Inside Perrigo (Global Policies) for the following documents:

- Code of Conduct
- Compliance Frequently Asked Questions (FAQs)
- Global Travel and Expense Policy
- Global Policy on Contracts
- Policy on Interactions with HCPs/HCOs
- Third-Party Due Diligence Manual
- Whistleblower Policy
- Letter Returning Inappropriate Gift

16. VERSION CONTROL

VERSION NR	2.0
DEPARTMENT	GLOBAL COMPLIANCE & PRIVACY
APPROVED BY	COMPLIANCE AND CORPORATE VALUES COMMITTEE (CCVC)
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