

Contents

1.	PURPOSE.....	1
2.	SCOPE.....	2
3.	WHISTLEBLOWING vs GRIEVANCE REPORTING	2
4.	MISCONDUCT COVERED BY THIS POLICY	2
5.	CONFIDENTIALITY AND ANONYMOUS REPORTING.....	3
6.	REPORTING CHANNELS	4
7.	RULES APPLICABLE TO ALL WHISTLEBLOWER REPORTS.....	4
8.	TREATMENT OF REPORTS	5
9.	PROTECTION OF WHISTLEBLOWER/ RETALIATION PROHIBITED	5
10.	TREATMENT OF PERSONAL DATA	6
11.	DOCUMENT RETENTION	6
12.	CONTACT INFORMATION	6
13.	RELATED DOCUMENTS	6
14.	VERSION CONTROL	6

1. PURPOSE

Perrigo Company plc (“Perrigo”) is committed to the highest standards of ethics, integrity, honesty, and accountability when conducting its business. Perrigo expects everyone at the company to live up to the same standards when performing their duties and responsibilities.

This **European Whistleblower Policy (“Policy”)** should be read in conjunction with Perrigo’s Code of Conduct, which requires all Perrigo Personnel to comply with the letter and spirit of applicable laws, rules, regulations and policies.

The purpose of this Policy is to reinforce the business integrity of Perrigo by:

- encouraging and enabling Perrigo Personnel to safely raise concerns about unlawful or other inappropriate activities
- explaining the protections provided for those who make “good faith” Reports of suspected Misconduct (as defined in Section 4 and Appendix A)
- encouraging proper individual conduct and accountability and
- alerting Perrigo and, where appropriate, the Audit Committee, of ongoing or potential serious problems at an early stage so that proper resolutions and remedies can be administered

This Policy sets out how Perrigo Personnel are able to raise their concerns, confidentially and where allowed by local law anonymously, free of any retaliation, detrimental treatment, discrimination or harassment. This Policy is available on the Company’s website (www.perrigo.com) and intranet (Inside Perrigo/ Global Policies).

2. SCOPE

This Policy applies to employees, temporary employees, contractors, consultants, operating groups, and subsidiaries, former Perrigo Personnel, or other who have a professional relationship with us in Europe (including any affiliates in the European Union, the European Economic Area countries, the UK and Switzerland,) (together referred to as “**Perrigo Personnel**”).

This European Whistleblower Policy does not apply to Perrigo Personnel in:

USA, Canada, China, India, Turkiye, Serbia, Ukraine	Please refer to Perrigo’s Global Whistleblower Policy
Australia	Please refer to Perrigo’s Australian Whistleblower Policy

This Policy applies to the fullest extent permitted by applicable laws. However, in some countries, local laws require modifications to this Policy. Please review the EU Whistleblower Local Laws (“**Local Laws**”) for additional rules applicable to your country.

3. WHISTLEBLOWING vs GRIEVANCE REPORTING

There is a difference between Whistleblowing and raising a Grievance:

- **Whistleblowing** is where an individual has a concern about a potential danger, wrongdoing or illegality that can harm others within the workplace or that has a public interest aspect to it (for example because it threatens customers, third parties, investors or the public generally, as explained further in Section 4 and APPENDIX A). The person reporting Misconduct is referred to as “**Whistleblower**” herein.
- **A Grievance** is a concern, problem or complaint that generally relates to an individual’s own employment position or personal circumstances at work.

If Perrigo Personnel have a Grievance, they should **continue to report through the reporting channels** listed in Section 6.

4. MISCONDUCT COVERED BY THIS POLICY

Whistleblowing is the reporting of actual or suspected misconduct, illegalities, wrongdoing or dangers in relation to Perrigo’s activities (“**Misconduct**”) as detailed in Appendix A and including:

1. unlawful activity (i.e., a violation of any applicable law or governmental regulation)
2. violation of the Perrigo’s Code of Conduct
3. questionable or inaccurate accounting/bookkeeping or financial reporting
4. circumventing internal accounting controls or auditing practice
5. other serious matters or suspected violations that affect workplace safety or have a public interest aspect, including violations in the following areas:
 - (a) public contracts or procurement, government contracting
 - (b) securities laws
 - (c) financial laws (e.g., anti-money laundering, antitrust)
 - (d) tax laws

- (e) product safety
- (f) protection of the environment
- (g) public health and safety
- (h) consumer protection
- (i) protection of privacy and personal data, and security of network and information systems
- (j) transportation safety
- (k) food and feed safety
- (l) animal health and welfare
- (m) drug supply or use
- (n) work conditions and work practices that may affect the health and safety of employees
- (o) criminal laws (including fraud, corruption, bribery, violence and intimidation, criminal damage to property, etc.).

Any Reports of Misconduct as listed above are referred to as “**Whistleblower Reports**”. Perrigo Personnel are encouraged to submit a Whistleblower Report through the channels set out in Section 6.

5. CONFIDENTIALITY AND ANONYMOUS REPORTING

All Whistleblower Reports are kept strictly confidential, and all investigations are conducted in a confidential manner to protect the Whistleblowers’ identity and all other persons involved. The identity of the Whistleblower will be confidential unless Perrigo (or relevant government bodies) are required by law or compelled by court order or legal process to break that confidentiality or the Whistleblower consents to disclosure of their identity. Only select individuals who need to know, and whose participation is necessary to investigate or resolve the Whistleblower Report, will be involved in investigating and responding to a Whistleblower Report. Such select individuals may include outside legal counsel. Only personal data which are adequate, relevant and necessary to resolve the Whistleblower Report will be processed.

Whistleblowers may make a Whistleblower Report anonymously and Perrigo will respect the Whistleblower’s desire to remain anonymous. However, Perrigo encourages everyone making Whistleblower Reports to identify themselves. If a person makes an anonymous Whistleblower Report, it may be more difficult for Perrigo to ask follow-up questions to obtain all the facts and properly investigate the Whistleblower Report. In addition, it may be more difficult to provide the Whistleblower information about the status of Perrigo’s investigation of the Whistleblower Report.

Finally, if a person reports anonymously, it may be more difficult for the Whistleblower to establish that they are entitled to protections as a whistleblower under applicable local laws because there may be no documentary evidence that they are the Whistleblower and therefore entitled to protection.

6. REPORTING CHANNELS

Whistleblower Reports can be submitted orally, in writing or during a meeting through one of the following internal channels described below.

Direct reporting:

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

Indirect reporting (available in multiple languages):

- Online reporting tool at Ethicshotline.Perrigo.com
- 24/7 telephone hotline (local telephone numbers available at Ethicshotline.Perrigo.com)
- Mail to:
Perrigo Board of Directors, in care of General Counsel
The Sharp Building
Hogan Place
Dublin 2, Ireland

While we encourage internal reporting where Misconduct can be addressed effectively, Whistleblower Reports may also be submitted externally to appropriate government authorities. Nothing in this Policy is intended to limit, interfere with or prevent Perrigo Personnel from reporting information to the appropriate local government officials, bodies or agencies when they have reasonable cause to believe that a violation of law has occurred. The EU Whistleblower Policy Local Laws provide details of appropriate government authorities for your specific jurisdiction and whether anonymous reporting is possible to those authorities.

7. RULES APPLICABLE TO ALL WHISTLEBLOWER REPORTS

Perrigo Personnel who make good faith Whistleblower Reports are protected from retaliation as explained in Section 9. A “**good faith**” report means that the reporting person has provided information on breaches that they had reasonable grounds to believe was true at the time of reporting and that it involves reportable Misconduct. To ensure that the reported Misconduct can be followed up and investigated, Perrigo Personnel is encouraged to report as much information as possible, including reasonable suspicions, about actual or potential breaches, which occurred or are very likely to occur in Perrigo, and about attempts to conceal such breaches.

If a Whistleblower Report is made in good faith but the facts alleged are not confirmed by subsequent investigation, no action will be taken against the Whistleblower. Whistleblower Reports not made in good faith may result in disciplinary action and loss of protection under this Policy and applicable laws, as explained further in Section 9.

The Whistleblower is not required to provide evidence or to identify individual(s) involved in the Misconduct in order to make a Whistleblower Report. To the maximum extent permitted by law, Perrigo will investigate Whistleblower Reports even if this information is not included.

Where the Whistleblower has identified themselves, Perrigo will keep the Whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent Perrigo giving the Whistleblower specific details of our investigation or the disciplinary action taken as a result. If so, Perrigo will explain this to the Whistleblower. The Whistleblower should treat all aspects of and any information about Perrigo's investigation as confidential.

Except in the case of anonymous Whistleblower Reports, Perrigo will acknowledge receipt of the Whistleblower Report within seven days and will, where appropriate and possible, provide feedback about the status of the investigation to the Whistleblower within three months.

8. TREATMENT OF REPORTS

Perrigo is committed to ensuring that all Whistleblower Reports raised will be dealt with appropriately, consistently, fairly and professionally. Perrigo will ensure that each Whistleblower Report is handled by appropriate, independent channels. For example, Whistleblower Reports relating to accounting, internal accounting controls, or auditing matters will be reviewed initially by the General Counsel and, where appropriate, the Chief Financial Officer, the Chairman of the Audit Committee or such other persons as the Audit Committee determines to be appropriate.

Whistleblower Reports relating to alleged Misconduct by any Perrigo executive management or that raise legal, ethical or compliance concerns about Perrigo policies or practices will be reviewed initially by the General Counsel and sent to the Lead Independent Director of the Company's Board of Directors. Other types of Whistleblower Reports will be handled by similar and appropriate independent channels.

9. PROTECTION OF WHISTLEBLOWER/ RETALIATION PROHIBITED

Retaliation means any direct or indirect act or omission which occurs in a work-related context, prompted by whistleblowing, and which causes or may cause unjustified detriment to the Whistleblower. Retaliation is strictly prohibited. Perrigo will use its utmost efforts to prevent any form of retaliation by Perrigo and its employees against Perrigo Personnel that has submitted a Whistleblower Report in good faith, voices a concern under this Policy, or participates in the investigation of a Report.

Forms of prohibited retaliation include but are not limited to false reciprocal reporting, discharge, disciplinary action, demotion, denial of promotion, denial of benefits, department/office transfer, reduction in job duties or authority, threats, harassment, suspension, or reduction in hours or pay.

Perrigo Personnel found to have engaged in retaliatory behavior, improperly interfered with an investigation or have failed to maintain an individual's anonymity, will be subject to disciplinary action, up to and including termination of employment. Anyone who believes they have been subjected to any behavior that violates this Policy should immediately report such behavior to the Global Compliance & Privacy Team and/or the Perrigo General Counsel.

Anyone who knowingly files a misleading or false Whistleblower Report or without a reasonable belief as to the truth or accuracy of the Whistleblower Report will not be protected by this Policy and may be subject to serious discipline, including termination of employment. Additionally, a Whistleblower may be held liable for any personal involvement in any discovered Misconduct.

during the investigation.

10. TREATMENT OF PERSONAL DATA

Perrigo Personnel should refer to Perrigo's EU Whistleblower Privacy Notice for further information on how Perrigo handles Personal Data and for further details and an explanation of the rights they may have with respect to their Personal Data. However, Perrigo may delay or deny access to Personal Data processed in the handling and investigation of Whistleblower Reports where necessary to protect the integrity of the investigation, where access could undermine the rights and freedoms of others, or if delay is otherwise necessary under the circumstances.

As explained above, the identity of the Whistleblower will be kept confidential unless Perrigo (or relevant government bodies), are required by law to break that confidentiality or the Whistleblower consents to disclosure of their identity.

11. DOCUMENT RETENTION

Once an investigation is completed, referred to authorities or otherwise resolved by Perrigo, all Personal Data related to the Whistleblower Report will be deleted or archived as soon as is reasonable under the circumstances and applicable laws. Applicable laws may require Perrigo to delete Personal Data within a specified period of time. Perrigo may retain anonymized information about the Whistleblower Report for statistical and reporting purposes.

All documents related to a Whistleblower Report shall be maintained in secured files and retained in accordance with Perrigo's Document Retention Policy and applicable laws.

12. CONTACT INFORMATION

All questions related to this Policy or applications of and compliance with any laws, should be addressed to:

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

13. RELATED DOCUMENTS

- Anti-Corruption Policy
- Australian Whistleblower Policy
- Code of Conduct
- EU Whistleblower Local Laws
- EU Whistleblower Privacy Notice
- Global Whistleblower Policy
- Protecting Personal Data Policy

14. VERSION CONTROL

VERSION NO	VERSION 1.0
DEPARTMENT	GLOBAL COMPLIANCE & PRIVACY
EFFECTIVE DATE	16 JAN 2024

APPENDIX A

The following are examples of the kind of incidents or conduct which may be reportable as Whistleblowing to ensure legal or ethical compliance.

1. Accounting Irregularities
2. Accounting Matters or Controls
3. Accounting Misrepresentation
4. Adverse Events (Adverse Reaction to Perrigo Product)
5. Advertising & Promotions Improprieties (including potential misrepresentations, other violations of advertising laws, or potential antitrust or competition law violations)
6. Antitrust, Competition laws, Public Procurement & Unfair Competition
7. Bribery and Kickbacks
8. Code of Conduct Violation
9. Compliance and Regulation Violations (Non-Financial)
10. Compliance and Regulation Violations, including corporate tax (Financial)
11. Conflict of Interest
12. Consumer Protection
13. Corporate Scandal (i.e., any serious violations of the Code of Conduct that negatively impacts the company's reputation)
14. Defective Products
15. Environmental issues
16. Expense Report Improprieties
17. Falsification
18. Financial Irregularities
19. Fraud
20. Good Manufacturing Practices Violations
21. Government Contracting Improprieties
22. Improper Gifts & Entertainment
23. Inappropriate Dealings with Business Partners (including potential violations of antitrust or competition laws, kickbacks, or bribes)
24. Inappropriate Outside Activities (i.e., Code of Conduct violations outside of the workplace)
25. Inappropriate Political Activities (i.e., unauthorized use of corporate resources for political activities and/or unauthorized lobbying activities)
26. Industrial Accidents
27. Insider Trading
28. Intellectual Property & Confidential Information Breach or Misuse
29. International Trade Violations
30. IT Security, Breach or Policy Violation
31. Misuse of Company Funds
32. Misuse/Abuse of Power, Authority or Control
33. Money Laundering
34. Payroll Fraud
35. Product Quality & Safety Incident
36. Protection of privacy and personal data
37. Public health
38. Retaliation
39. Threat to Public Safety
40. Unusual or Suspicious Activities
41. Vendor & Contractor Concerns
42. Violations of Securities Laws