

## 1. PURPOSE

Perrigo is committed to providing an environment that is free of unlawful harassment, discrimination and retaliation. To uphold this commitment, Perrigo strictly prohibits all forms of unlawful discrimination and harassment on the basis of: age (e.g., in USA, 40 or older), ancestry, color, religious creed, disability (mental and physical), marital status, genetic information, denial of family and medical care leave, military and veteran status, national origin, race, sex (including pregnancy, child birth, breastfeeding, and medical conditions related to pregnancy, child birth or breastfeeding), gender, gender identity and gender expression, sexual orientation, political activities or affiliations, or any other protected status in accordance with all applicable federal, state and local laws ("Protected Categories"). Perrigo will not tolerate any form of discrimination or harassment that violates this Policy. This Policy is in addition to the **Equal Employment Opportunity Policy**.

## 2. SCOPE

This Global Non-Discrimination and Anti-Harassment Policy applies to all workers, including employees, temporary employees, contractors, consultants, operating groups, subsidiaries and departments ("Perrigo Personnel").

Perrigo Personnel is prohibited from harassing other Perrigo Personnel as well as Perrigo's customers, vendors, suppliers, independent contractors and others doing business with the Company. Perrigo also prohibits its vendors, suppliers, independent contractors and others doing business with Perrigo from harassing Perrigo Personnel.

## 3. DISCRIMINATION PROHIBITED

Perrigo prohibits discrimination in employment opportunities or practices on the basis of a Protected Category. This Policy extends to all aspects of Perrigo's employment practices, including, but not limited to, recruiting, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leaves of absence, and other terms and conditions of employment.

Discrimination occurs when a person is harassed or treated arbitrarily or differently because of the person's real or perceived membership in a Protected Category, as outlined in the first paragraph of this Policy. In the employment context, discrimination may begin with an adverse employment action, which is something an employer has done that is unfair to an employee (for example: terminating the employee or not selecting him or her for hire or a promotion, denying the employee's request for a reasonable accommodation, etc.). If Perrigo determines, through a fact-finding investigation, that the employee or applicant's membership in a Protected Category was the reason for the adverse employment action, a Policy violation may be found.

Personality differences, conflicts, or general treatment not based on the above Protected Categories, or communications regarding poor performance are usually employee relations issues, not discrimination or harassment matters. Employees should contact a Human Resources representative to discuss an employee relations matter. HR can also help you determine what type of issue you may be experiencing and will refer you to the appropriate resources.

## 4. HARASSMENT PROHIBITED

Perrigo is committed to providing a workplace that is free of unlawful harassment. Perrigo prohibits verbal or physical harassment by any Perrigo Personnel in the course and scope of employment, on the basis of any Protected Categories.

Harassment includes verbal, physical, visual, or any abusive conduct that creates an intimidating, offensive, or hostile working environment or that unreasonably interferes with job performance or negatively impacts productivity or morale. The conduct strictly prohibited by this Policy includes any harassment or abusive conduct concerning any Protected Category. Among the types of conduct prohibited by this Policy are epithets, slurs, jokes, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. The Company prohibits that conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment. The Company also prohibits conduct that occurs using electronic communication equipment and media, such as through email or social media.

## 5. SEXUAL HARASSMENT PROHIBITED

This Policy also prohibits sexual harassment at Perrigo. “Sexual harassment” is defined as unwelcome sexual advances; requests for sexual favors and other verbal or physical conduct where:

- Submission to such conduct is either an explicit or implicit condition of employment; or
- Submission to, or rejection of, such conduct is used as the basis for employment decisions affecting the person involved; or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

This Policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature and regardless of whether it rises to the level of a legal violation. Any unwelcome conduct based on gender is also forbidden by this Policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders.

Examples of sexual harassment forbidden by this Policy include, but are not limited to:

<u>Verbal</u>	<u>Physical</u>	<u>Visual</u>
<ul style="list-style-type: none"> <li>• sexual innuendos</li> <li>• suggestive comments</li> <li>• insults of a suggestive nature</li> <li>• jokes about sex or gender-specific traits</li> <li>• sexual propositions</li> <li>• threats</li> <li>• repeated unwanted social invitations</li> <li>• suggestive or insulting sounds</li> <li>• whistling</li> </ul>	<ul style="list-style-type: none"> <li>• touching</li> <li>• pinching</li> <li>• brushing against another's body</li> <li>• massaging</li> <li>• physical attack</li> <li>• leering</li> <li>• obscene gestures</li> <li>• exposure of one's private body part(s) to another</li> </ul>	<ul style="list-style-type: none"> <li>• Displaying of offensive sexually suggestive objects, pictures, cartoons or posters</li> <li>• Offensively suggestive or obscene letters, notes or invitations</li> <li>• Sexually suggestive text messages</li> <li>• Sexually suggestive or explicit photos via text message, social media or print</li> </ul>

## 6. REPORTING PROCEDURES

If you have a complaint of harassment about a co-worker, supervisor, client or third party, letting the individual know their behavior is unwelcome or offensive is often the best first action to take. If this is not possible, appropriate, or the behavior does not stop, you must report the conduct to a member of management, your supervisor, department manager, or Human Resources Manager. If you are not comfortable doing so, you may also report it through [Ethicshotline.Perrigo.com](https://ethicshotline.perrigo.com), except where prohibited by law.

Online:	<a href="https://ethicshotline.perrigo.com">Ethicshotline.Perrigo.com</a>
Telephone	Please visit <a href="https://ethicshotline.perrigo.com">Ethicshotline.Perrigo.com</a> for your local dialing instructions

All complaints involving any Executive Committee member, senior leader, site leader, country leader, and any member of their respective management teams, must be immediately reported to the General Counsel, Chief Human Resource Officer or Assistant General Counsel Global Labor & Employment, except where prohibited by law.

It is your responsibility to inform management of behavior you believe is in violation of this Policy. All supervisors must report complaints of misconduct under this Policy to human resources immediately so the Company can investigate and comply with its legal obligations.

Employees who have any questions about what constitutes harassing or discriminatory conduct should contact their supervisor or a Human Resources representative.

### 7. RESPONDING TO COMPLAINTS

All complaints of unlawful harassment which are reported will be investigated as promptly as possible and, upon conclusion of such investigation, appropriate corrective action will be taken where warranted. Perrigo prohibits employees from hindering internal investigations and the internal complaint procedure. All complaints of unlawful harassment reported to management will be treated as confidentially as possible, consistent with Perrigo's need to conduct an adequate investigation. Employees are required to cooperate in investigations, consistent with law. Only the parties involved, witnesses, and other persons with a need to know, as determined by Perrigo, will be made aware of the report. There may be situations where behavior is inappropriate but does not rise to the level of conduct prohibited by this Policy. These situations will be handled separately, and the Company will respond as it determines is appropriate, including applying disciplinary action.

### 8. CORRECTIVE ACTION

If an investigation reveals that a violation of this Policy or other inappropriate conduct has occurred, then the Company will take corrective action, including discipline, up to and including separation from employment, as is appropriate under the circumstance, regardless of the position of the parties involved. The Company may discipline an employee for any inappropriate conduct discovered in violation of this Policy, regardless of whether the conduct amounts to a violation of law. If the person who engaged in the conduct in violation of this Policy is not a Perrigo employee, then the Company will take whatever corrective action is reasonable and appropriate under the circumstances.

### 9. RETALIATION PROHIBITED

Perrigo prohibits retaliation against those who report, oppose or participate in an investigation of alleged violations of this Policy. If an employee feels that he or she is being retaliated against, the employee should immediately contact the employee's supervisor or a Human Resources representative. In addition, if an employee observes retaliation by another employee, supervisor, manager or nonemployee, he or she should immediately report the incident to the individuals identified above.

Any employee determined to be responsible for violating this Policy will be subject to appropriate disciplinary action, up to and including separation from employment. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this Policy will be subject to appropriate disciplinary action, up to and including separation from employment.

All employees who experience or witness any conduct they believe to be retaliatory should immediately report such behavior to a supervisor, manager, Human Resource representative, the legal department, or through EthicsHotline, except where prohibited by law.

### 10. RELATED DOCUMENTS

- Equal Employment Opportunity Policy

These documents are available on the Global Policy Page on Inside Perrigo.

### 11. VERSION CONTROL

<b>VERSION NO</b>	VERSION 1.0
<b>DEPARTMENT</b>	HUMAN RESOURCES
<b>REVIEW DATE</b>	08 MAR 2021
<b>EFFECTIVE DATE</b>	01 OCT 2021
<b>APPROVED BY</b>	CCVC