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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 live up to the same standards when performing their duties and responsibilities.

This **Global Whistleblower Policy** (“**Policy**”) should be read in conjunction with Perrigo’s Code of Conduct, which requires all employees, officers, directors, temporary employees, contractors, and consultants (“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
- 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 laws 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 all Perrigo Personnel, and subsidiaries in the **USA, Canada, China, India, Turkiye, Serbia and Ukraine**.

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

Europe (including any affiliates in the European Union or European Economic Area countries, the UK and Switzerland)	Please refer to Perrigo's European Whistleblower Policy
Australia	Please refer to Perrigo's Australian Whistleblower Policy

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, including:

1. unlawful activity (i.e., violation of any applicable law or governmental regulation)
2. violation of 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., statutes related to 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 Report, will be involved in investigating and responding to a Report. Such select individuals may include outside legal counsel. Only personal data which are adequate, relevant and necessary to resolve the Report will be processed.

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

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 violations 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 violations, which occurred or are very likely to occur in Perrigo, and about attempts to conceal such violations.

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 attempt to 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 any information about Perrigo’s investigation as confidential.

Except in the case of anonymous Whistleblower Reports, Perrigo will acknowledge receipt of the Report within seven days and will attempt where appropriate and possible to 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 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.

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 Reports will be handled by similar and appropriate independent channels.

9. PROTECTION OF WHISTLEBLOWERS / 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 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 in the course of the investigation.

10. TREATMENT OF PERSONAL DATA

Perrigo Personnel should refer to the Perrigo Protecting Personal Data Policy 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. 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.

The identity of the Whistleblower will be kept confidential unless Perrigo (or relevant government bodies) are required by law to disclose the identity of the Whistleblower, 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) or
- Legal (Legal@perrigo.com)

13. RELATED DOCUMENTS

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

14. VERSION CONTROL

VERSION NO	VERSION 2.0
DEPARTMENT	GLOBAL COMPLIANCE & PRIVACY
APPROVED BY	AUDIT COMMITTEE
APPROVAL DATE	27 OCT 2023
EFFECTIVE DATE	16 JAN 2024

APPENDIX A

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

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