



## **PERRIGO COMPANY**

### **SUPPLIER CODE OF CONDUCT INTRODUCTION**

This Supplier Code of Conduct defines the guiding principles that Perrigo expects its suppliers to follow with respect to employment conditions, environmental responsibility, legal and ethical business practices, and facility security and inspections.

Perrigo is committed to ensuring that all of its suppliers, regardless of location, comply with this Supplier Code of Conduct and enforce these principles throughout their own supply chains. To the extent the supplier is subject to other written local standards or requirements regarding employment, environment or business practices; the supplier should adhere to the most stringent applicable requirements. Perrigo may monitor activities through on-site inspections, signed supplier agreements and certifications and third party assessments. Suppliers may not use subcontractors to produce Perrigo products or components without Perrigo's written approval. Suppliers are responsible for ensuring that these subcontractors comply with Perrigo's Supplier Code of Conduct.

### **EMPLOYMENT CONDITIONS**

#### **Child Labor Will Not Be Used**

Suppliers must not employ any person younger than either the applicable legal minimum age for working or fourteen years of age, whichever is greater. Children and young persons under eighteen will not be employed in hazardous conditions.

#### **Employees Are Treated with Respect and Dignity**

Suppliers must treat all employees with respect and dignity and may not use monetary fines or deductions from wages as disciplinary practices. Employees may not be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

#### **Employment Is Freely Chosen**

Suppliers must maintain employment on a voluntary basis and must not use forced, prison, bonded, indentured or involuntary labor. Workers must not be required to lodge "deposits" on their identity papers with their employer but must be able to leave their employer after reasonable notice.

#### **Safe, Clean and Healthy Working Conditions**

Suppliers must be committed to providing a clean, safe and healthy working environment, designed to prevent accidents and injury during the course of work. Suppliers must provide

employees, including new or reassigned workers, regular and recorded health and safety training.

The work environment must comply with applicable laws and regulations and provide access to clean restrooms, potable water, sanitary areas for food storage, adequate medical facilities, safety personal protective equipment, well-lighted and comfortable work stations, safe storing of chemicals and well-known emergency plans with clear and accessible aisles and exits.

### **Fair Wages and Benefits**

Suppliers must fairly compensate their employees by paying wages and providing benefits that meet or exceed the applicable, legally mandated minimum requirements in the country in which the suppliers operate. Employees should be provided with a clear, written account of each pay period that reflects any wage deductions and that complies with applicable laws.

### **Working Hours Are Not Excessive**

Suppliers must maintain employee work hours in compliance with local standards and applicable laws of the jurisdictions in which they operate. Employees must be informed at the time of hiring if mandatory overtime is a condition of employment. Employees are to be permitted reasonable days off and applicable leave of absence privileges.

### **No Discrimination Is Practiced**

Terms and conditions of employment should be based on an individual's skills and ability to do the job and not on personal characteristics or beliefs. While Perrigo respects cultural diversity, Perrigo's suppliers must not discriminate against their employees in hiring practices or any other term or condition of work, based on race, age, color, national origin, gender, sexual orientation, religion, disability, political opinion, social or ethnic origin, or other similar factors.

### **Compliance with Immigration Law**

Suppliers must employ only workers with a legal right to work by verifying original documentation (not photocopies) before workers are allowed to begin employment. Suppliers should have procedures in place to demonstrate compliance and should periodically audit any employment agencies from which suppliers obtain employees to monitor compliance.

### **Respect Freedom of Association and the Right to Collective Bargaining**

Suppliers must recognize and respect the legal right of workers to freely associate (or not associate) with any group, such as collective bargaining groups or unions, as long as such groups are legal in their own country. Suppliers must not discriminate against workers' representatives but must allow them to carry out their representative functions in the workplace. Suppliers must adopt an open attitude towards the activities of trade unions and their organizational activities.

## **COMMUNITY ENGAGEMENT**

Perrigo is committed to the communities within which we operate. We support local communities through charitable donations and volunteerism to improve educational, cultural, economic and social well-being. Perrigo values suppliers that parallel this kind of commitment to the communities in which they operate, and that demonstrate community engagement through volunteering, philanthropy and public-private partnerships that will have a positive and enduring effect on the communities they touch.

## **LEGAL AND ETHICAL BUSINESS PRACTICES**

Perrigo will conduct business only with suppliers who display ethical, sound and legal practices and conform to applicable local and national laws, treaties, rules, regulations and other industry practices. If industry practices conflict with applicable laws or regulations, suppliers must, at a minimum, comply with the applicable legal requirements.

## **ENVIRONMENTAL RESPONSIBILITY**

Our suppliers must comply with environmental practices and be compliant with all applicable laws and regulations. All waste materials and manufacturing by-products must be disposed of, and all wastewater treatment/discharge and air emissions must be handled in an environmentally responsible manner according to local laws and regulations.

### **Clinical Trials**

Perrigo upholds ethical, scientific and clinical standards throughout the globe and expect our suppliers to do the same. All studies must be designed and conducted in accordance with applicable laws and regulations and globally recognized principles of international ethics in order to ensure the safety of subjects who participate in clinical trials.

### **Intellectual Property**

Our suppliers must respect, protect and secure our intellectual property and other confidential information.

### **Labeling**

Suppliers must comply with applicable labeling laws and regulations of the countries in which the products, materials, active ingredients, excipients or components are distributed.

### **Customs Clearance**

Commercial invoices and attachments provided by our suppliers for customs clearance must contain all required information to ensure proper declarations and payment of duties, taxes and fees. Failure to supply complete and accurate commercial invoices may result in cancellation of orders and/or rejection of products/materials.

### **Good Manufacturing Practices**

Suppliers must follow current Good Manufacturing Practices for methods used in, and the facilities or controls used for, the manufacturing, processing, packing, or holding of all products, materials, active ingredients, excipients and components manufactured for or distributed to Perrigo. These practices ensure that such drug products meet the requirements for safety and have the identity and strength and meet the quality and purity characteristics that it purports or is represented to possess.

### **Ethical Conduct/Conflicts of Interests**

Our suppliers must not do anything that is illegal or unethical and must prevent conflicts of interest or compromising conduct in relationships, actions and communications. Suppliers must not give or receive gifts or gratuities other than those that are nominal and consistent with local practices. In addition, suppliers must not make bribes or improper payments of any kind. Suppliers must comply with all anti-corruption laws, including those that 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. Suppliers need to conduct their business with Perrigo in a truthful and open manner and must comply with all applicable laws, regulations, specifications, quality criteria, and product requirements.

## **FACILITY SECURITY & INSPECTION REQUIREMENTS**

### **Facility Security**

Suppliers must maintain adequate security at all production and warehousing facilities in order to protect product quality and integrity throughout the supply chain and during transport. Suppliers must also establish facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments. Such items would include illegal drugs, biological agents, explosives, weapons, radioactive materials and other contraband. Written security procedures must be maintained to demonstrate adequate security controls.

### **Inspection Requirements**

Suppliers must maintain adequate records and permit Perrigo, or its designees, the right to conduct unannounced inspections of the suppliers' facilities and records. Suppliers are required to fully disclose to Perrigo all material facts relating to production, including the use of subcontractors. Suppliers must allow Perrigo representatives access to production facilities. In addition, suppliers must respond promptly to reasonable inquiries by Perrigo representatives concerning the subjects addressed in the inspections.

THE PRINCIPLES CONTAINED IN THIS SUPPLIER CODE OF CONDUCT CONSTITUTE MINIMUM AND NOT MAXIMUM STANDARDS. PERRIGO ENCOURAGES SUPPLIERS TO EXCEED THE MINIMUM REQUIREMENTS WHERE POSSIBLE TO PROMOTE BEST PRACTICES AND CONTINUOUS IMPROVEMENT THROUGHOUT ALL OF THEIR FACILITIES.

PERRIGO RESERVES THE RIGHT TO CANCEL ALL CURRENT PURCHASE ORDERS WITH ANY SUPPLIER FOUND TO BE IN VIOLATION OF THE SUPPLIER CODE OF CONDUCT.