

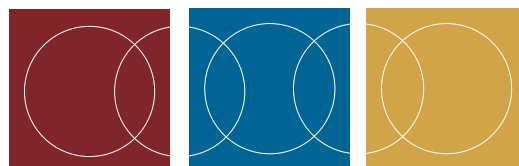


# CODE of CONDUCT



July, 2016

we are responsible



# a message from our CEO

Dear Colleagues:

Since the Company's founding in 1887, Perrigo has had a reputation for integrity and responsible conduct. That reputation, built over time and rebuilt every day, is what sets us apart with our consumers, customers and shareholders. It is the heart of our Company and its success.

As Perrigo continues to grow into a global company, we can – and must – maintain our strong reputation by doing the right thing. What does doing the right thing mean? It means upholding our core values of respect, integrity and responsibility in all that we do at Perrigo. Our continued success depends on it.

Our Code of Conduct, "We are Responsible," helps all of us act with integrity and safeguard Perrigo's reputation. It contains the global standards we must follow to ensure that we uphold our core values, and it provides principles to guide our conduct and help us do what is right.

The Code applies to all of us, no matter what position we hold or our geographic location. It is important that you read and understand the Code and refer to it frequently. And I encourage each of you to ask any questions and raise any issues you might have, even when doing so could be difficult.

Together, we are responsible for sustaining our Company's reputation and for doing what is right. And together, I am confident that our Company will continue to maintain its reputation for integrity and responsible conduct. Thank you for joining me in this effort.

**John Hendrickson**  
**Chief Executive Officer**



*"As Perrigo continues to grow into a global company, we can – and must – maintain our strong reputation by doing the right thing."*

# our core values

## respect

**We demonstrate the value we hold for one another.**

- We act with respect towards our colleagues and others with whom we interact.
- We communicate openly and candidly and address our differences professionally.
- We emphasize teamwork, value each person's contribution, and collaborate in confidence and trust.

## integrity

**We do what is right.**

- We are committed to conducting our business with individual and organizational integrity.
- We comply with applicable laws and avoid conflicts of interest.
- We are reliable, honest and trustworthy in our dealings.

## responsibility

**We hold ourselves accountable for our actions.**

- We accept personal responsibility for everything that we do, and we lead by example.
- We treat the Company's reputation as our own and try to make wise use of our time and the Company's resources.
- We take responsibility for performing at our best and strive to achieve our own and the Company's potential.
- We are committed to a culture of shared responsibility that promotes a safe, healthy and high performing workforce.



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# getting started

## ■ Why do we have a code?

Our Code outlines the behaviors we must follow to uphold Perrigo's Core Values and ethical standards. It shows us how to evaluate ethical dilemmas and provides the contact information we should use when we have questions or concerns.

## ■ Who must follow this code?

All Perrigo employees, officers and directors must act according to the principles set forth in our Code. We expect everyone working on Perrigo's behalf, including contract employees, consultants, agents, suppliers and business partners, to adhere to our ethical standards. We should never ask a third party to engage in any activity that violates these standards.

Only the Board of Directors or a Board committee may grant a waiver of this Code of Conduct for an executive officer or Board Director. These waivers will be promptly disclosed as required by law or stock market regulations. The General Counsel must approve waivers of this Code of Conduct for all others.

## ■ How to use the code of conduct

- Know your responsibilities as employees and managers.
- Read the Code and familiarize yourself with its standards.
- Know the resources available to you when you have questions or concerns.
- Understand how to use the Decision Tool.



*“Conduct our business according to the highest ethical and legal standards.”*

## What are our responsibilities?

**As employees, officers and directors of Perrigo**, we have made a commitment to understand and follow the principles set forth in this Code. In addition, we are required to:

- Familiarize ourselves with and follow all laws, regulations and policies that apply to our jobs. Ignorance cannot justify anyone doing the wrong thing.
- Conduct our business according to the highest ethical and legal standards. Stop and think whenever you or someone else says, “Maybe just this once,” or “No one will ever know.”
- Report concerns and known or suspected misconduct immediately. Do not assume that someone else will raise a concern.

**As Perrigo executives and managers**, we have additional responsibilities in that we are also required to:

- Act as role models, holding ourselves to the highest standards of ethical business conduct.
- Reinforce our Code by communicating regularly about ethics and compliance to make sure employees understand the behaviors expected of them.
- Create a positive work environment where employees are comfortable raising questions and concerns.
- Monitor employees’ business conduct to ensure compliance with our Code.
- Ensure employees complete their Code training.
- Annually certify our commitment to these principles, confirming that we have disclosed any known misconduct and that we are not aware of any violations of our Code.
- Immediately report any known or suspected ethical or legal misconduct and never retaliate or ignore acts of retaliation against others.



## ■ How will I know if there is a problem?

Our Code provides guidance on some common legal and ethical issues that you might encounter. However, it cannot address every situation that may arise. When you face an ethical dilemma, think through the situation using the decision tool on page 17. If you use this tool and are still unsure what course of action to take, talk to your manager or someone in the Corporate Compliance or Legal Departments to seek clarification.

You may also come across situations that pose ethical dilemmas while conducting business internationally. If another country's local law, custom or practice conflicts with Irish or U.S. law, Company policy or this Code; seek guidance from Corporate Compliance or Legal. In such circumstances, we must always adhere to the law, custom or practice that is most stringent.

## How should I report concerns?

If you are aware of or suspect unethical or illegal conduct, you have a responsibility to report the issue or seek guidance. Consider speaking first to a manager with whom you feel comfortable or your local Human Resources representative.

You may also ask questions or raise issues in any of the following ways:

- Talk to your manager
- Contact Corporate Compliance or your local Compliance Coordinator
- Contact the Legal Department
- Contact our third-party reporting system (EthicsPoint), either directly or anonymously, as outlined in the Resources section on page 5

Perrigo will investigate all reports promptly, thoroughly and fairly, taking appropriate action as necessary. You are expected to participate in an investigation when asked, and every effort will be made to safeguard your confidentiality both during and after the investigation.

## What if I want to make an anonymous report?

You can submit an anonymous concern, either by telephone or Internet, to the independent third-party reporting system listed in the Resources section on page 5. This system is available 24 hours a day, 7 days a week. If you choose to make an anonymous report, your anonymity will be protected to the fullest extent possible. Keep in mind, however, that maintaining your anonymity may limit our Company's ability to investigate your concerns.

Due to regulatory constraints employees in Europe may or may not be able to use the hotline to report issues anonymously. Please contact your local management for further guidance.



## What if I am concerned about retaliation?

Perrigo prohibits retaliation against individuals who make a good faith report of known or suspected ethical or legal misconduct. A “good faith” report means that you have provided all of the information you have and you believe it to be true.

In addition, our Company prohibits retaliation against anyone who participates in investigations in good faith. When requested, all of us are required to assist and actively participate in internal investigations.

Retaliatory acts may lead to disciplinary action, up to and including termination. If you believe you have experienced retaliation, you should report it immediately.

**For more specific information about non-retaliation, see the *Whistleblower Policy* located in the Global Policies section of the intranet.**

## What are the consequences for violating the code?

Violations of our Code may carry serious consequences, including disciplinary action, up to and including termination. Those violating the Code may also face civil or criminal liability.

Violations include asking other employees, third parties, contractors or anyone else to violate the Code, not reporting a Code violation, and failing to cooperate in a Code investigation. Further, violating the Code will result in discipline that, depending on the circumstances, may include reprimand, demotion, loss of merit increase, loss of bonus or stock options, suspension or termination.

Management will promptly investigate possible violations of the law, the Code or Company policies in a manner that ensures our standards are applied consistently throughout the organization.



**Q.** Where can I find Perrigo's global policies?

**A.** For a listing of Perrigo global policies go to [Inside Perrigo > Global Policies](#).

For additional site specific policies, please contact your local manager.

For those sites who do not have access to the SharePoint site, please contact Global Corporate Compliance and Privacy at [GlobalCorporateCompliance@perrigo.com](mailto:GlobalCorporateCompliance@perrigo.com).



# resources

The resources below are available to assist you with questions about the Code of Conduct or other policies as well as concerns about business conduct:

- **Perrigo SharePoint Site**

For a listing of Perrigo global policies, go to [Inside Perrigo > Global Policies](#)  
For additional site specific policies, please contact your local manager.

- **Your Supervisor or Manager**

This person is your principal resource since he or she knows your job duties and how they may be impacted by certain policies or situations.

- **Another Senior Manager or Your Local Compliance Coordinator or Compliance Committee**

If your supervisor or manager is unavailable, or if you are uncomfortable discussing the issue with this person, you should contact another senior manager in your department or location, your local compliance coordinator or compliance committee.

- **Global Corporate Compliance or the Legal Department**

If you have questions regarding the interpretation or implementation of specific corporate policies, please contact these departments.

- **Human Resources Department**

If you have questions about employment or employee relations issues, contact the Global Human Resources.

- **Finance Department**

If you have questions about financial or accounting matters, contact Perrigo's Chief Financial Officer.

- **Alternate Reporting**

Also, you can submit a concern, either directly or anonymously, by telephone or Internet, to an independent third-party reporting system:

### **EthicsPoint**

- **Through the Internet at [www.Perrigo.EthicsPoint.com](http://www.Perrigo.EthicsPoint.com)**
- **Telephone in the U.S., call 855-826-5540**
- **Telephone outside the U.S., please see [www.Perrigo.EthicsPoint.com](http://www.Perrigo.EthicsPoint.com) for a local telephone number.**

- **The Board of Directors**

If you believe your concern can only be addressed by Perrigo's Board of Directors, we invite you to send your concern to them. When doing so, please mark the outside of the envelope with "confidential." You can choose to remain anonymous when submitting your concern. Mail your concern to: Perrigo Board of Directors, in care of the General Counsel, Perrigo Company, 515 Eastern Avenue, Allegan, MI 49010.



# Perrigo's Code...

## We Are Responsible for Complying with the Law, Policies and Procedures

Acting with integrity is vital for maintaining our reputation with our customers, consumers, shareholders and other stakeholders. As part of a global company, each of us must comply with the letter and spirit of applicable laws, rules and regulations in the countries in which we operate. Violations of these laws and regulations can be costly to Perrigo and can subject both the Company and you as an individual to civil and criminal penalties. Each of us is responsible for understanding the laws and regulations that relate to our responsibilities. When you do not understand, you should discuss the matter with your manager or the Legal or Corporate Compliance Departments.

We must adhere to this Code of Conduct and other Company policies to ensure we are engaging in safe, effective and responsible conduct. At Perrigo, we are committed to consistently acting with high standards of business conduct. Such actions demonstrate the respect for and value that we place on our relationships with our customers, consumers, suppliers, business partners, communities and each other.

In many instances, this Code of Conduct references more detailed Company policies that provide more specific information regarding a particular question or issue. You are encouraged to review this information.

Certain employees and directors have additional responsibilities related to financial reporting and safeguarding Perrigo information. Refer to the Global Policies section of the intranet for additional information.



# We Are Responsible for Building Trusting Relationships with Our Customers, Consumers and Suppliers

We can best build and maintain our vital customer relationships by strengthening their trust in us, acting in their best interests and treating them with fairness and respect.

- **Consumer health and safety**

The safety and quality of our products are vitally important to us. Our customers seek our products because they trust that every product we make will be of the highest quality. That is why it is critical that we follow all quality, safety and manufacturing policies and procedures to ensure that every product we ship meets our high standards.

- **Product packaging and promotional materials**

We follow rigorous laws, regulations and Company policies to ensure that our packaging and promotional materials are accurate and adhere to appropriate marketing and advertising practices.

- **Current Good Manufacturing Practices**

As a pharmaceutical company, we are governed by current Good Manufacturing Practices and other country-specific quality requirements for developing, manufacturing and packaging our products. Following these requirements ensures that we retain a strong reputation for product quality. In the rare situations when consumer safety may be compromised and a recall occurs, it is important that you follow all product recall procedures and comply with applicable United States Food and Drug Administration or other country-specific regulations.

- **Defective products**

Any concerns about product safety or quality must be reported as soon as possible so they can be quickly addressed and resolved.

- **Procurement**

Purchasing decisions should be made based on objective and impartial information. Treat current and potential suppliers fairly during the sourcing process.

**Q.** While at a neighborhood party, a friend mentioned that his mother had a severe headache after taking a Perrigo product. Do I need to report this?

**A.** Yes, you must report all adverse events related to Perrigo products that come to your attention. Although it may turn out that the event was not, in fact, caused by a Perrigo product, it is important that we investigate all possible incidents.





## We Are Responsible for Dealing Fairly with Others

We want those with whom we do business to view our business practices as reliable, honest and trustworthy. We want to outperform our competition fairly and with integrity. We will succeed based on the quality and value of our products and not by illegal or otherwise improper business practices. Competition laws, also known as “antitrust” laws, generally prohibit agreements with competitors, suppliers or customers that could unfairly limit free and open competition.

A business contact that seems innocent – such as lunch with a competitor’s employee or a business chat at an industry conference – may be viewed as violating antitrust laws.

**Q.** It is almost the end of the fiscal year and we have money left in our budget. Is it acceptable to use up that budget by pre-paying a vendor for services we know we will need next year?

**A.** No, pre-paying vendors or other parties for goods and services that have not been completed is not acceptable. Activities must be charged to the fiscal year in which they take place.

- **Perrigo actions**

To promote fair competition, it is important that we do not unfairly discriminate in prices offered to various customers, set unfair prices below cost or make false statements about competitors.

- **Relationships with competitors**

It is important that we use caution when interacting with competitors. Even the appearance of cooperating with competitors can damage our reputation and legal standing. We must never work with competitors to fix prices, rig bids, allocate markets among us, boycott certain organizations or industry segments, or make other non-competitive agreements.

- **Relationships with customers and suppliers**

Agreeing to set resale prices, requiring a partner to buy from us in order for us to buy from them, or requiring a partner to buy certain non-related products or services in order to purchase others are all actions that can damage Perrigo’s reputation and lead to serious consequences for the Company and individuals involved.

The “antitrust” or “fair competition” laws in many countries that address these issues are detailed and complex. If you are involved in activities where these laws apply (such as marketing, pricing, contracts or contracting, or other activities that impact the way in which we set agreements or conditions with customers, suppliers or competitors), you must be familiar with these laws and regulations. This responsibility includes becoming aware of the laws of the local countries in which we do business since these laws can vary widely. For more information, refer to the **Fair Competition and Antitrust Policy** located in the Global Policies section of the intranet or contact the Legal Department.

# We Are Responsible for Protecting Our Shareholders' Assets

Appropriate use and management of Perrigo's assets – such as its equipment, supplies, funds, records, information and, most important, reputation – is critical to effectively serving our customers and consumers and providing a fair return to our shareholders. We must always be mindful to safeguard these assets, avoid waste and make the best use of them.

- **Ensuring accurate books, records and financial reporting**

Our shareholders and others count on us to keep business records that truly and accurately reflect Perrigo's financial condition and operations. All of us are responsible for ensuring Perrigo's books, records, and accounts fully and accurately reflect the Company's business transactions. This includes ensuring proper completion and submission of time sheets, invoices, expense reports, payroll, benefits records and performance evaluations. It also means timely completion and filing of all documents that we are required to submit to regulators.

- **Safeguarding information**

Preserving Perrigo's reputation means that we have a responsibility to protect the confidential and proprietary information we produce on a daily basis. This information includes intellectual property, business and financial information (for example, sales, earnings and balance sheet items), business forecasts, business plans, acquisition strategies and other information that might benefit competitors or harm Perrigo or our customers if disclosed. Our responsibility extends to information entrusted to Perrigo that belongs to our customers or other business partners.

- **Privacy**

Perrigo uses personally identifiable information for a wide variety of purposes including, but not limited to, payroll, performance reviews, and clinical studies. The company will comply with applicable privacy laws regarding the proper collection, storing, processing, transferring, and accessing this information. See the Global Corporate Privacy Policy for further information.

The vast majority of the information, documents or data used to perform our job duties are for internal use only. We may disclose or communicate this information to individuals outside of Perrigo only when we are specifically authorized to do so.



## • Properly using computers, networks, e-mail and the Internet

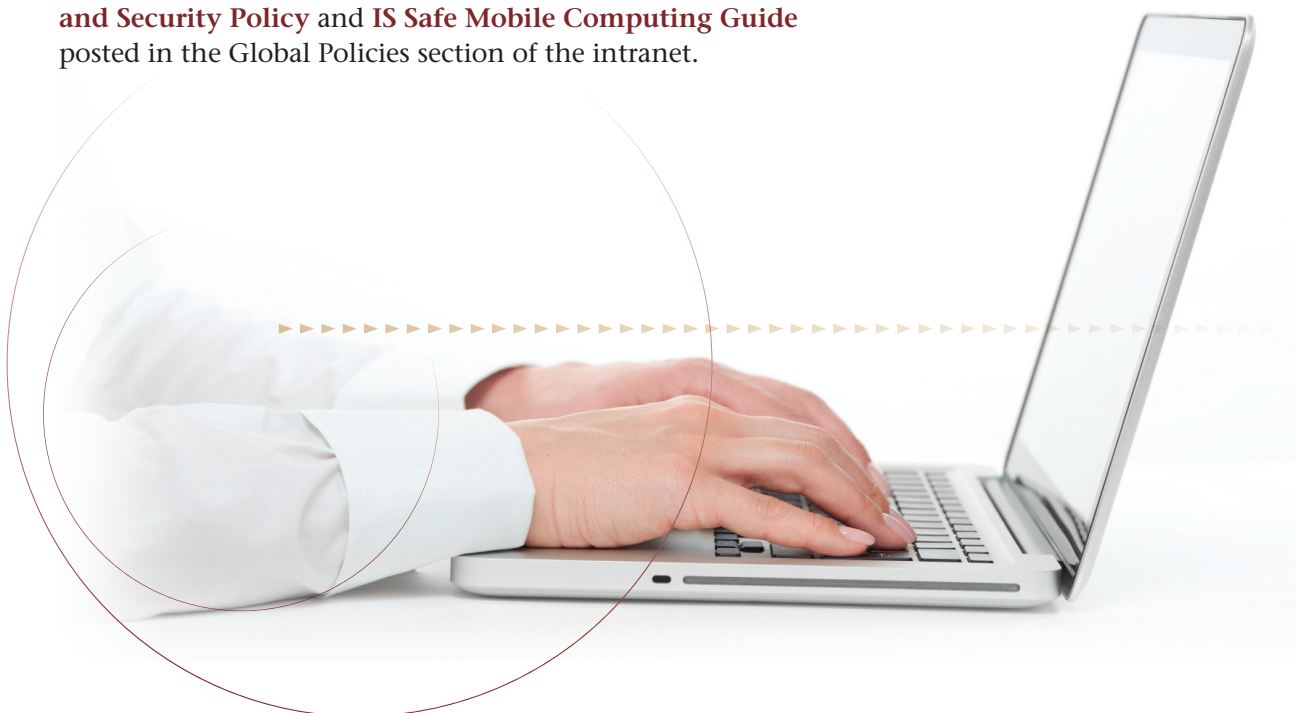
Perrigo maintains a wide range of electronic devices and networks to help you work as effectively as possible across the company. While mobile phones, Internet access, e-mail and other systems can enhance your productivity, they must be used appropriately so as not to expose our data and systems to security risks. This means:

- Passwords should not be revealed to others and should be changed on a regular basis,
- Unauthorized software should not be installed on your computer system,
- Perrigo systems should never be used to display, procure or transmit inappropriate material, including abusive or objectionable language, and information that is illegal or obscene,
- Company communication systems should not be used to distribute e-mails with large files that can clog up the network or that may contain viruses or other malicious code,
- Perrigo business information should only be shared with authorized parties using company-approved technology, and
- You may not use Perrigo communication systems to solicit employees for any unauthorized purpose.

Although you may use Perrigo equipment and communication systems for incidental personal matters, you should use good judgment and should not expect privacy to be guaranteed, except where mandated by law. More information about the use of Perrigo systems is provided in the **Corporate Information and Security Policy** and **IS Safe Mobile Computing Guide** posted in the Global Policies section of the intranet.

**Q.** I was using the Internet at home and came across a blog where sensitive Perrigo information was being shared. What should I do?

**A.** Disclosure of confidential Perrigo information is prohibited and could jeopardize our business objectives. You should promptly notify your supervisor or the Corporate Compliance Department.



## • Inside information/insider trading

It is illegal to buy or sell securities (i.e., stocks, options, etc.) when you are aware of material, non-public (or “inside”) information. Material inside information is any information that, if it were made public, could affect any investor’s decision to buy or sell a company’s stock. Making trades based on inside information violates both civil and criminal law and the public’s trust for us to safeguard and properly use this information. You should protect all non-public information from unauthorized access. For more information and additional responsibilities for certain groups of employees, see the **Insider Trading and Stock Transactions Policy** posted on the Global Policies section of the intranet.

## • Product diversion

As a pharmaceutical company, it is important that our raw materials and finished products are not diverted for any purpose, including the manufacturing of illegal drugs. We must account for all materials and products, and safeguard these materials from unauthorized access so that none are improperly used.

# We Are Responsible for Avoiding Conflicts of Interests

We have a responsibility to act in Perrigo’s best interests over our own and not use the Company’s property or information, or our position within the Company, for improper personal gain. This includes avoiding direct and indirect competition with the Company as well as situations that others could perceive to be conflicts.

*If you are unsure what constitutes a conflict, please contact your manager or the other resources listed on page 5.*

## • Outside employment and service

There is potential for a conflict of interest if your outside business or interests affect your performance or engagement as a Perrigo employee. We cannot request or accept salaries, fees, commissions or other compensation from anyone with current or potential business ties to Perrigo or one of our competitors. We also cannot serve with an organization that has current or potential business ties to Perrigo, even if compensation is not paid. Exceptions require approval of the Board or a Board committee (for directors or officers) or the General Counsel (for all other employees).

## Material, Non-Public Information

Examples of information that can be material depending on the situation include:

- financial results or forecasts
- possible mergers, acquisitions, divestitures, etc.
- information about product development
- knowledge of legal actions
- information about major changes in the business
- inside information about our business partners

This information is considered non-public if it has not been disclosed to the public through press releases, official meetings or webcasts with external stakeholders, or public filings with regulatory agencies.



**Q.** What is considered to be “nominal value”?

**A.** Any gift with a value that is insignificant or small; a token gesture; anything that when given is or can be perceived as highly unlikely to affect one’s judgment or decisions. Typically, small promotional items, such as inexpensive pens or coffee mugs with a company logo, qualify as having nominal value. If you are unsure, ask your manager or one of the resources listed on page 5 for help.

• **Financial interests**

We cannot hold a financial or other interest in Perrigo’s suppliers, customers or competitors, except for a holding that is not likely to provide the appearance that our business judgment is compromised. Reasonable exceptions must be reviewed by Perrigo’s General Counsel to ensure that the interest will not interfere with responsibilities to Perrigo. A financial interest does not include security holdings of a supplier, customer or competitor in mutual or index funds or similar investments where the individual does not have direct investment control.

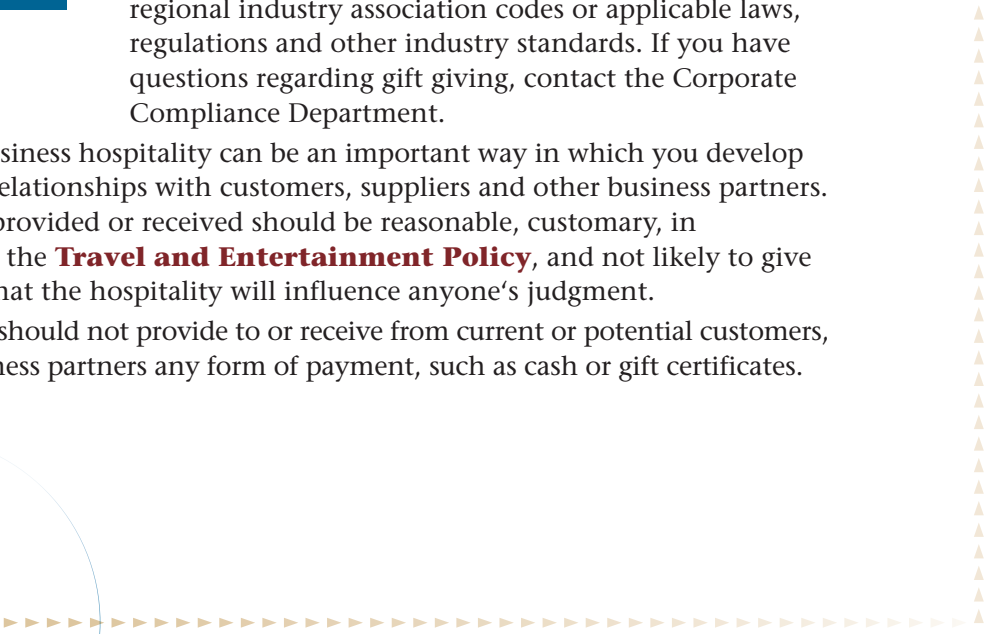
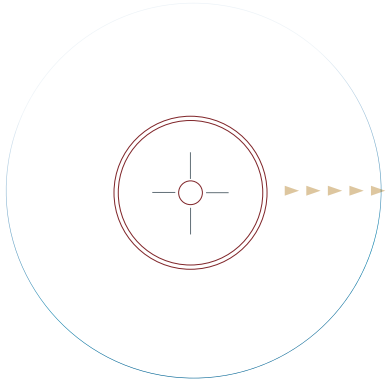
• **Gifts, hospitality and payments**

**Receiving Gifts:** We cannot request or accept gifts or favors greater than nominal value from individuals who deal or seek to deal with Perrigo. Any gift we receive that is valued at more than nominal value should be returned to the provider. Perishable items greater than nominal value can only be accepted for a group of employees where the average value per participating employee is nominal. Under no circumstances should we request these gifts or indicate that these gifts are expected. If you have questions regarding a gift you receive, contact the Corporate Compliance Department.

**Giving Gifts:** We also may not give gifts or favors to individuals who deal or seek to deal with Perrigo. Improper gifts include anything that has greater than nominal value or that is given to any individual to obtain preferential treatment for either Perrigo or ourselves. In some instances, gift giving of any type may not be appropriate due to applicable national and regional industry association codes or applicable laws, regulations and other industry standards. If you have questions regarding gift giving, contact the Corporate Compliance Department.

**Hospitality:** Business hospitality can be an important way in which you develop and strengthen relationships with customers, suppliers and other business partners. Any hospitality provided or received should be reasonable, customary, in compliance with the **Travel and Entertainment Policy**, and not likely to give the impression that the hospitality will influence anyone’s judgment.

**Payments:** You should not provide to or receive from current or potential customers, suppliers or business partners any form of payment, such as cash or gift certificates.





# We Are Responsible for Fostering a Positive Work Environment

Perrigo is committed to maintaining a work environment where you and your colleagues feel comfortable, valued and safe, no matter where you are in our global organization. This means that we respect our colleagues, their property, their self-esteem and their contributions to the overall success of Perrigo.

**Q.** Do I need to report a minor accident? I don't want to impact my area's safety record or bonus payout.

**A.** Yes. Acting with integrity means being diligent, not just in promoting a safe work environment, but also reporting all accidents, even minor ones. Having accurate reports of all accidents is important to our ability to identify unsafe practices or environmental hazards and make necessary adjustments.

- **Non-discrimination/non-harassment**

We are committed to providing a positive work environment that promotes equal employment opportunities and is free from all forms of illegal and improper discrimination and harassment, including sexual harassment. We provide equal opportunities in all of our employment practices and seek to ensure that each one of us is treated with fairness and dignity.

- **Safe workplace practices**

We are committed to providing a healthy and safe work environment at Perrigo. To ensure this objective, we have strict standards and a robust safety program to help us maintain a safe work environment. It is important that each of us promotes safety by looking out for our colleagues and reporting possible safety hazards.

Ensuring our safety also means avoiding the use of illegal drugs, alcohol or other medications and substances that could compromise your or others' safety or product quality.

- **Health and well-being of employees and their families**

We are committed to providing resources and programs that support the good health and well-being of employees and their families. We believe that people with a commitment to healthy habits live longer, happier and more productive lives. Perrigo encourages employees and their families to demonstrate a personal commitment to individual health and vitality by engaging in a healthy lifestyle and taking advantage of company-provided preventive care resources and educational opportunities.





# We Are Responsible for Conducting Business with Respect for Local Conditions

Because each region in which we operate presents unique challenges and issues, we must be mindful of different approaches to conducting business while ensuring that we do not compromise local laws, regulations, policies and Perrigo's values and standards. Our activities around the world on behalf of Perrigo must demonstrate our commitment to abide by local laws and regulations and uphold the Company's standards of conduct.



## • Anti-corruption

Engaging in bribery or other forms of corruption, or even appearing to engage in such activity, can expose Perrigo to legal action. For that reason, we must conduct business in an ethical and lawful manner and comply with all applicable anti-corruption and anti-bribery laws and regulations. Employees may not directly or indirectly (through a third party) pay, promise, offer or authorize any bribe or facilitation payment. We must also maintain accurate books and records and a system of internal controls.

If anyone ever directly or indirectly solicits a payment from you, contact Perrigo's General Counsel for assistance. Additional anti-corruption information is provided in the **Anti-Corruption Policy and Procedure for Engaging Third Parties in High Risk Countries**, both of which are available in the Global Policies section of the intranet.

## Imports and Exports

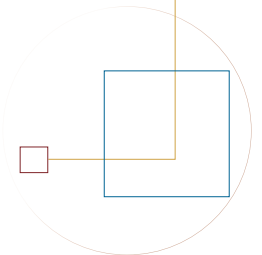
Imports – Includes bringing goods and materials that we purchase from a foreign or external source into another country.

Exports – Includes products, software, technology or information that is shipped, physically or electronically, to another country.

## • Imports/exports and boycotts

Since Perrigo is a global business, it is important that you are familiar with import/export laws and Perrigo's related policies and procedures if your job responsibilities are in any way related to the import or export of materials and information. This includes the transmittal of technical data across national borders using the Internet or other electronic means.

Also, there are times when the United States and other governments institute boycotts or restrict trade as part of foreign policy and national security activities. Please contact the General Counsel immediately before taking any action if you receive any boycott-related requests.



# We Are Responsible for Supporting Our Communities and the Public

The communities in which we operate provide us with a strong workforce, useful resources and respectful neighbors. In return, we must show that we are a responsible corporate citizen. This means that we should respect and protect the environment from adverse impacts as a result of our operations, engage in the political process in a responsible manner, and fulfill our obligations to provide appropriate information to regulatory and legal authorities and the public.

## • Environmental impact and social responsibility

Perrigo's Corporate Social Responsibility commitments include:

- Helping consumers access safe, effective and affordable healthcare products
- Complying with regulatory and legal requirements
- Demonstrating environmental stewardship
- Continuously improving packaging sustainability
- Protecting the human rights of our global employees and challenging our partners to do the same
- Providing a safe and healthy work environment for our global employees
- Establishing effective community partnerships

Each of us has the responsibility to understand the laws, regulations and policies that support these commitment areas. In particular, we must adhere to all requirements related to the use, control, transportation, storage and disposal of materials that may reach the environment.

## • Political contributions and activities

Various laws restrict a company's involvement in campaigns, lobbying and other political activities. Therefore, we cannot use Perrigo's funds or assets to support a political party, committee or candidate. Perrigo will not reimburse employees for political contributions, and Perrigo does not make political contributions.

Our standards regarding improper payments, gifts and political contributions apply when we are engaged in business dealings globally.

Although Perrigo encourages you to exercise your right to participate in the political process, it is important that you do so as individuals, and that you do so responsibly. You may not use Company time, funds, facilities or assets for political purposes.



## • External contacts

Perrigo believes that an open dialogue with external stakeholders helps us maintain our integrity and strengthen our corporate reputation. To ensure that communication with the media, financial analysts, regulators, law enforcement and the general public is accurate and appropriate, such communication must only be conducted by those individuals whose jobs include responsibility for such interaction.

If communicating with the media, financial analysts, regulators, law enforcement and the general public is not part of your job description, you should refer any external contact to the appropriate personnel within Perrigo:

- Media, analysts or shareholders – All requests or contacts from the media should be directed to Perrigo’s Vice President of Investor Relations and Corporate Communications. All requests or contacts from analyst or shareholders should be directed to Perrigo’s Vice President of Investor Relations and Corporate Communications or Perrigo’s Chief Financial Officer. No one should speak with the media, analysts, shareholders or the general public on behalf of the Company without approval from the Vice President of Investor Relations and Corporate Communications, the Chief Financial Officer or the Chief Executive Officer.
- Regulators – If you receive any contact from regulatory agencies, you should take the person’s contact information and immediately notify your manager.
- Law enforcement – Contact from any law enforcement agency should be directed to Security or the Legal Department.

Only those individuals who have managing external contacts as part of their job responsibilities should communicate with the media, analysts, shareholders, regulatory and law enforcement agencies, or the general public on behalf of the Company.

## • Social media use

Perrigo recognizes that social media outlets are popular forums to listen to, learn from and engage with others. Use caution when using outlets such as blogs, micro blogs (i.e., Twitter), social networking sites (i.e., Facebook and LinkedIn), wikis, media sharing sites and chat rooms. There is a big difference between speaking “about” Perrigo and speaking “on behalf of” Perrigo.

As discussed above, only a very small number of Perrigo employees are permitted to speak on behalf of the Company.

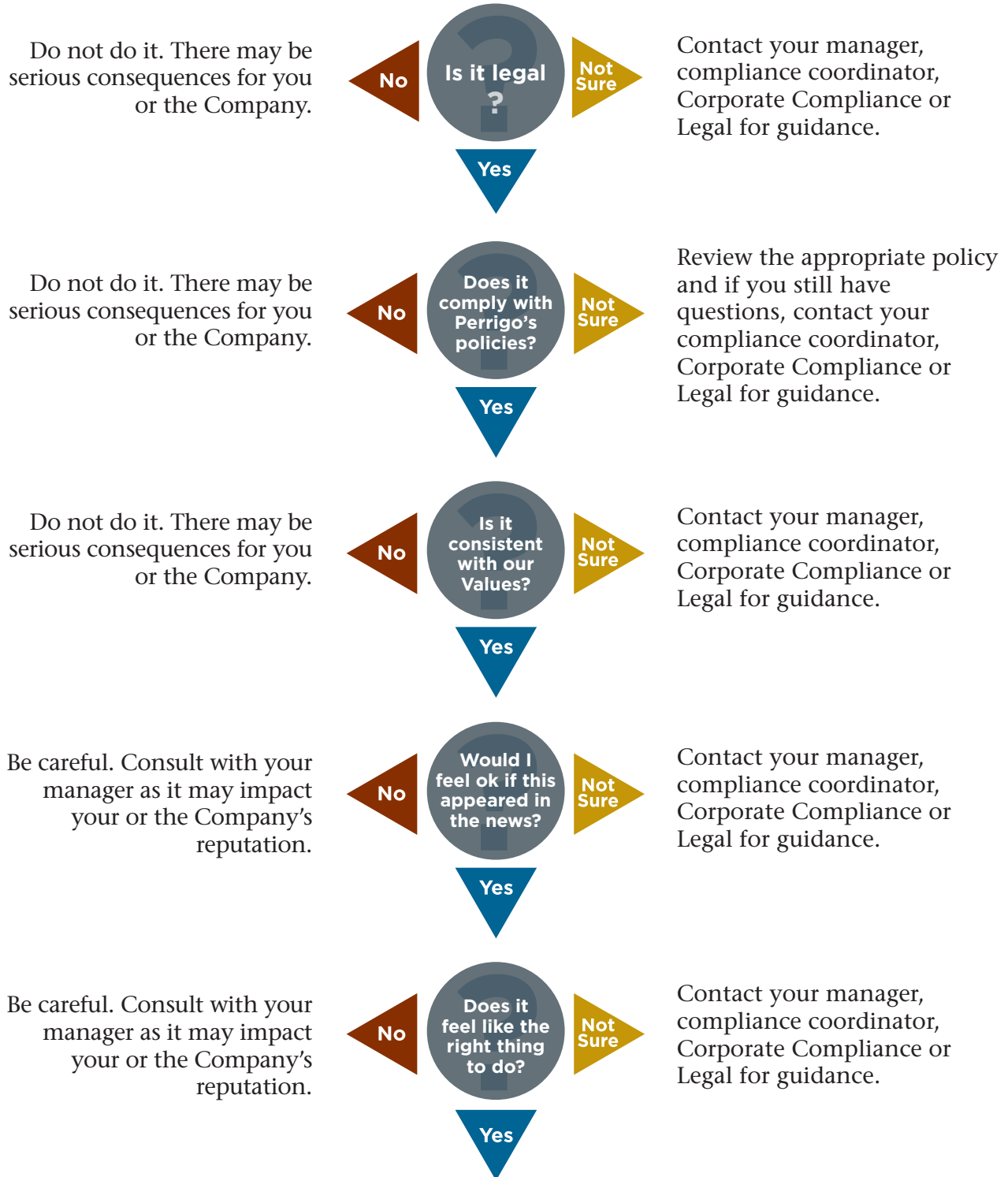
When speaking about the Company in a social media outlet or other public forum, be careful to only share publicly available information or refer others to the information on the Perrigo.com website. All employees engaging in social activities should follow **Perrigo’s Guidelines on Social Media Communications**. Be mindful that what you say to one person you know can quickly be forwarded to hundreds of people that you do not know.

If you see information that is critical of Perrigo or our industry being shared, you should not respond in the Company’s defense. Instead, you should notify your manager, the Vice President of Investor Relations and Corporate Communications, or the Corporate Compliance team for follow up.



# decision tool

Use this decision tool when you face a difficult decision. If you are still unsure what course of action to take, talk to your manager, Corporate Compliance or Legal to seek clarification. Also, see the resources listed on page 5.



Thank you for doing the right thing.



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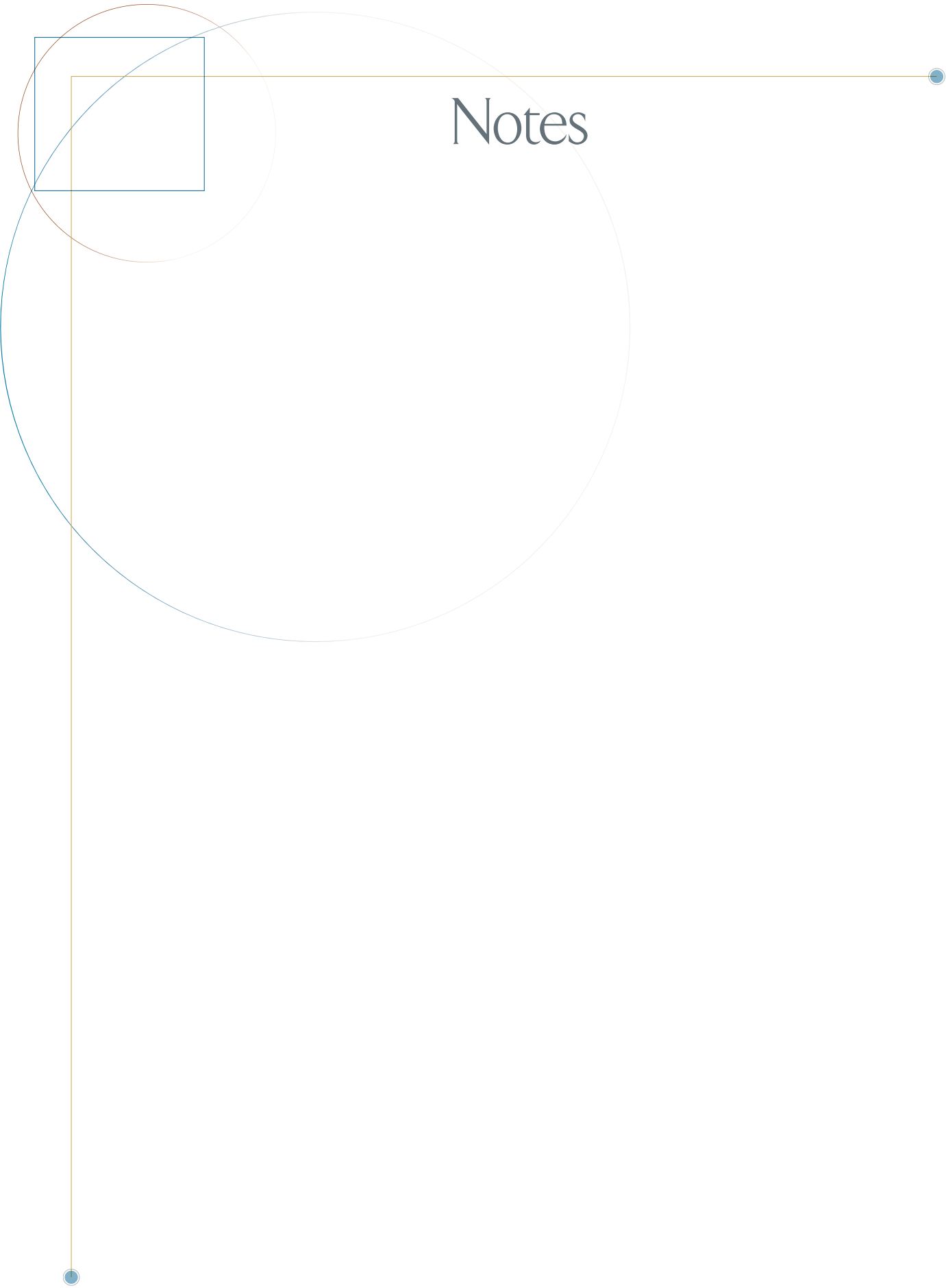
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# Notes



WE  
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RESPONSIBLE

REPUTATION

INTEGRITY  
RESPECT  
PRINCIPLES  
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CONDUCT  
PRINCIPLES  
CONDUCT  
PRINCIPLES  
RESPECT  
RESPONSIBILITY

