

ANTI-CORRUPTION POLICY

Purpose and Scope

The purpose of the Anti-Corruption Policy is to promote compliance with all applicable anti-corruption and anti-bribery laws and regulations and to establish guidelines for complying with these laws while conducting business at Perrigo.

This Policy applies to all Perrigo employees, operating groups and subsidiaries worldwide.

General Anti-Corruption Requirements

All Perrigo employees and individuals acting on behalf of Perrigo must conduct business in an ethical and lawful manner and comply with applicable anti-corruption laws and regulations (e.g., Foreign Corrupt Practices Act, UK Bribery Act, etc). If you have any questions about the requirements of any applicable anti-corruption law or regulation, please contact the Global Corporate Compliance & Privacy Department, the Legal Department or your local Compliance Coordinator.

Prohibited Conduct

Perrigo employees may not either directly or indirectly (through a third party) *pay, promise, offer or authorize* any

- bribe;
- facilitation payment (see below);
- kick-back; or
- any other payment or benefit

to any person, business or government official entity in order to gain an improper business advantage or to retain business.

Employees are also prohibited from *receiving* bribes, kick-backs, illicit payments and benefits of any kind that are greater than nominal value from a person or entity conducting business with Perrigo.

Examples of prohibited conduct to secure improper business advantages include:

- paying a bribe or kickback to a third party in order to win a contract with that entity;
- paying a non-published expediting fee to an agent in order to expedite the approval/processing of a new product registration;
- promising a customs agent a “reward” to reduce the customs duties and sales tax; or
- paying for an official to stop in Las Vegas on his/her way to certify one of our facilities.

In addition, anti-corruption and anti-bribery laws are not limited to cash payments: giving or receiving gifts, trips, entertainment, commissions, stock, charitable contributions, and debt forgiveness are examples of other “benefits” that may also be prohibited.

If anyone ever directly or indirectly solicits a payment from you, contact Perrigo’s General Counsel or Global Corporate Compliance & Privacy for assistance.

Interactions with Government Officials

Dealing with government officials is not the same as dealing with private parties. This is true whether the government is acting as a customer, a supplier, a consultant/service provider or a regulator.

Business courtesies, hospitality and small gifts of nominal value that might be appropriate when you are dealing with private parties, like paying for lunch or dinner, are not appropriate or legal when you are dealing with government officials. In addition, the laws of most countries usually 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.

For these reasons, our policy is clear: we do not, either directly or indirectly through a consultant or other third party intermediary, give, pay, offer, promise or authorize the payment of money, favors, employment opportunities or anything else of value to a government official to influence government officials or to seek any improper business advantage.

However, in the course of business it may be proper for an employee to pay for or reimburse a foreign government official for meals, hospitality, transportation, or lodging expenses associated with product promotion or contract performance activities. These types of payment are only allowed if they are:

- permitted under U.S. and local laws;
- in compliance with the Corporate Travel and Entertainment Policy and any other; applicable policy; and
- ***pre-approved*** in writing by the Legal Department.

All approved payments must be accurately recorded in Perrigo's books and records.

For the purpose of this policy, a government official includes any:

- person acting in any official capacity on behalf of a government agency, department or instrumentality;
- employee of a state-owned or controlled company
- employee/physician working in a state owned or controller medical facility;
- person or officials representing a political party;
- candidate for a political office; or
- individual who may be acting on behalf of a government (i.e., consultants and engineers).

Facilitation Payments

Facilitation payments are small payments (non-published fees) made directly to officials for the purpose of expediting routine, non-discretionary official acts (e.g., processing permit applications; issuing driver licenses, visas, or passports). Facilitation payments **are prohibited** unless the circumstances involve an imminent threat to the health, safety or welfare of an employee or a member of his or her family. If a facilitation payment is made as a result of an imminent threat, the payment must be:

- for the sole purpose of ensuring personal safety;
- accurately recorded in Perrigo's financial books and records; and
- reported as soon as possible to the employee's supervisor and the Legal Department.

Recordkeeping

Perrigo's books, records and accounts must accurately and fairly reflect all financial transactions and disposition of assets. All entries should reflect the true nature, amount and purpose of all monies spent.

Employees are prohibited from establishing any kind of "slush fund," or other pool of monies that are not on Perrigo's books.

Violations of Anti-Corruption Laws

Under anti-corruption and anti-bribery laws, both Perrigo and its employees can be held liable for violations and can be punishable by imprisonment and/or fines. For that reason, you should know the following:

Engaging with Third Parties Operating in High Risk Countries

To ensure that Perrigo does business with reputable, honest and qualified third parties, employees must comply with the "Procedure for Engaging Third Parties in High Risk Countries" located on the corporate intranet under "*Global Policies*" or by contacting the Global Corporate Compliance & Privacy Department at globalcorporatecompliance@perrigo.com.

Political Contributions

Perrigo supports each employee's individual right to participate in the political process. Perrigo employees may make personal contributions of time or money to the political process so long as any such contribution does not interfere with their responsibilities at Perrigo or violate any applicable laws.

Charitable Donations

Perrigo only makes charitable donations that are legal under the applicable anti-corruption laws. All charitable donations must follow the local or the Perrigo Foundation review and approval process.

Lobbying Activities

Perrigo conducts legitimate lobbying and information activities to promote legislation, regulations and government policy favorable to our interest, both directly and indirectly through industry associations.

Perrigo reports all lobbying information as required to the appropriate authorities.

Resources Questions/Reporting Obligations

If you have any questions or concerns regarding this policy, please contact your supervisor, a more senior manager, Global Corporate Compliance & Privacy or the Legal Department.

If you believe that this policy is being or may be violated, promptly advise:

- your supervisor or management;
- a member of the Global Corporate Compliance & Privacy team;
- a member of the Legal team; or
- if you wish to submit your report anonymously (due to regulatory constraints, employees in certain countries may not be able to report concerns anonymously through the hotline), do so through www.perrigo.ethicspoint.com; call 855.826.5540 in the US or visit the website to determine the local (collect outside of the US) telephone number to report your concern via telephone.

Remember that the activities of consultants, agents or other representatives who violate anti-corruption or anti-bribery laws may be attributable to Perrigo. For that reason, you should remind these representatives to follow applicable anti-corruption and anti-bribery laws in their dealings on behalf of Perrigo. You must also report to the Global Corporate Compliance & Privacy or Legal Department any unusual transactions or arrangements to ensure the business purpose is legitimate and the controls are adequate to prevent improper payments.