



Hikma Pharmaceuticals USA Inc. Supplier Code of Conduct

Introduction

Hikma Pharmaceuticals USA Inc. and its U.S.-based affiliates (Hikma) is a large generic prescription medication manufacturer in the United States offering both oral solid and injectable pharmaceuticals to a growing number of chain stores, wholesalers, distributors, health systems and government agencies. We are the U.S. agent and subsidiary of Hikma Pharmaceuticals PLC, a UK corporation.

To maintain our reputation for producing safe, high-quality products, we are committed to going beyond mere compliance with the law and strive to uphold the highest ethical standards in everything we do.

Hikma suppliers are an integral part of this commitment to success. Hikma recognizes and expects a commitment to exemplary ethical and professional conduct both within Hikma and from its business partners. Hikma is committed to doing business with suppliers who operate their businesses with professionalism and integrity. The Hikma Supplier Code of Conduct expresses the expectations for how business is conducted between Hikma's employees and its suppliers. It is intended to provide information surrounding business and ethical issues that may arise while working with Hikma's employees. Any questions about this guide should be directed to your sourcing contact within Hikma.

Philosophy of Respect

A fundamental philosophy of respect for individuals, all of our employees and our suppliers underlies Hikma's commitment to ethical behaviour. As a Hikma supplier, you share our philosophy of respect by:

- Recognizing individual rights through compliance with employment laws and regulations.
- Protecting the workplace and environment through compliance with health, safety and environmental regulations.
- Recognizing the importance of diversity by strict adherence to equal opportunity laws and regulations.
- Adhering to all laws and regulations pertaining to discrimination and ensuring that the workplace is free from violations of the law.

Adherence to Legal Requirements

Hikma is committed to full compliance with all applicable laws and regulations. Hikma takes this responsibility seriously as part of its commitment to ethical and professional interactions with the public, our customers, and our suppliers.



Managing Supplier Relationships

Hikma's Sourcing Department is responsible for managing supplier relationships and coordinating the interaction within Hikma's technical and business staff. Any questions or correspondence related to materials or services should be directed to the appropriate contact within the Sourcing Department.

Procedures

Hikma requestors follow a set of guidelines when purchasing goods or services. Any business issues and/or negotiations regarding a proposed purchase are coordinated by Hikma's Sourcing Department, with the requestor providing input and technical assistance as needed.

It is important for suppliers to note that only the Hikma Purchasing Department has the authority to issue purchase orders (POs).

Starting work without a PO is not allowed.

All invoices must include a valid PO number. Invoices submitted without a purchase order number will automatically be returned to the supplier.

Competitive Practices – Antitrust Laws

It is Hikma policy to comply in every respect with applicable antitrust laws. Antitrust laws are intended to promote free and fair competition, and to prevent unlawful activities that might restrain competition. Hikma makes its business decisions based on its best interests, completely independent and free from any improper understandings or agreements with any competitor or third party. Hikma requires absolute avoidance of conduct which violates, or which might reasonably appear to violate, these underlying principles of antitrust law.

Confidential Information

Hikma requires that suppliers or potential suppliers who will be provided with Hikma's confidential information to protect that information from unauthorized disclosure. This can be done via, for example, a Confidentiality Agreement, Non-Disclosure Agreement, or supply agreement that includes confidentiality language. Confidentiality statements must be signed before any exchange of confidential information can take place. Your primary Hikma Sourcing Department contact will supply the appropriate agreement as needed. Any sensitive information, such as those types of information outlined below, should be held confidential at all times by suppliers.

Confidential information includes but is not limited to:

- Requests for Quotation or Proposal (RFQ or RFP)

- Financial, sales, or marketing information
- Operating processes which are not in the public domain
- Names of suppliers
- Sourcing strategies or pricing policies
- Contracts or contract details
- R&D discovery or development data

Drug Laws

In addition, Hikma has business relationships with third-party companies whose stock is publicly traded. Should any supplier receive any material, non-public information concerning those third-party companies, that supplier is prohibited from using that information for any gain by purchasing or selling, directly or indirectly, any financial instrument or investment related to that third-party company. Hikma expects strict adherence to all laws governing the purchase and sale of securities. Hikma is committed to complying fully with all applicable drug laws and regulations, including but not limited to (i) the Federal Food, Drug, and Cosmetic Act, (ii) the Prescription Drug Marketing Act, (iii) the Controlled Substances Act, as well as other applicable U.S. and international drug laws and regulations. In particular, Hikma requires full compliance by employees and suppliers with all rules and regulations issued by the Food and Drug Administration (FDA) and Drug Enforcement Administration (DEA), as applicable. FDA and DEA involvement in our industry affects every aspect of the business and supplier cooperation is essential to ensure full compliance.

Conflicts of Interest

Hikma is committed to integrity in its business relationships. It expects its employees, customers, suppliers to act ethically. Hikma expects that each employee will act at all times in the best interests of Hikma and be free from any actual or potential conflict of interest.

The below are examples of conflicts of interest that are prohibited by Hikma:

- No employee or member of an employee's family may have an undisclosed material ownership or significant financial interest in any supplier doing or seeking to do business with Hikma.
- No employee, without written approval from the Hikma CEO, may hold a position of director, officer, employee, consultant, representative, or agent with any supplier doing or seeking to do business with Hikma.

Gifts and Entertainment

One of the most common ways conflicts of interest arise is from the receipt of gifts or entertainment (i.e., anything of value, including but not limited to favors, tickets, and other gratuities) from suppliers doing business with or seeking to do business with Hikma. Because of these risks, Hikma has established the following restrictions:

- Employees may not use their position to solicit or request, directly or indirectly, anything of value from any supplier doing business or seeking to do business with Hikma.
- Similarly, a supplier may not offer anything of value to any Hikma employee if the gift, meal, or entertainment might reasonably be seen by others as affecting the employee's objectivity.

In short, offering or receiving gifts, meals, and entertainment must not raise any questions of an obligation or a conflict of interest.

Interactions with Healthcare Professionals

Hikma will not retain suppliers, consultants, or individuals who are, or who have employees who are:

- Debarred by a state or any branch of the federal government.
- Excluded from participation in Federal health care programs such as Medicare or Medicaid by the Office of the Inspector General (OIG/HHS) of the U.S. Department of Health and Human Services.
- Excluded by the U.S. General Services Administration (GSA) from Federal Procurement and Non-Procurement Programs.

Compliance with Laws

Consistent with its commitment to integrity, Hikma strives to ensure that its business interactions and practices do not involve, nor appear to involve, any improper influence or advantage. In particular, Hikma is committed to ensuring it is in full compliance with the requirements of the United States Foreign Corrupt Practices Act, the United Kingdom Bribery Act of 2010, all other applicable anti-bribery and anti-corruption laws and regulations, anti-slavery legislations, including the United Kingdom Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010, and anti-tax evasion legislation, including the United Kingdom Criminal Finances Act 2017, as each may be amended.

Hikma expects its suppliers to adhere to such laws and regulations, as they apply to them, when conducting any services for, or on behalf of, Hikma. Suppliers and their employees, contractors, or agents are prohibited from making, paying, offering to pay, promising or authorizing (directly or indirectly) the payment of money or anything of value, to anyone, including but not limited to

government officials in order to influence or obtain or retain approvals, licenses, secure improper advantages or business in connection with the services for, or on behalf of, Hikma. A supplier will immediately notify Hikma if it learns that any such payment, offer, promise, or authorization has been made, directly or indirectly.

Supplier Communications

Suppliers should strive to maintain a high level of communication with their Hikma Sourcing Department contact by providing copies of all communications made with Hikma requestors regarding projects or purchase orders.

Those communications that deal only with specific technical issues are exempt from this requirement.

Use of the Hikma name, trademarks, or other similar information in supplier advertising, media publications ,or product endorsements is prohibited without the prior written approval of the Hikma Sourcing Department contact.

Media and Public Relations

Hikma has established policies and procedures for external communications. Only authorized Hikma officials can issue statements to the media or general public about Hikma or its products. All inquiries from the media about Hikma or its products should be referred to your Hikma Sourcing Department contact, who will then route the inquiry through the appropriate channels.