

Our Code of Conduct

Sharing Responsibility and
Supporting Each Other



hikma.

Introduction



At Hikma we conduct our business with high ethical values and in compliance with all applicable laws. This involves setting, reviewing and updating our systems of internal control and providing comprehensive and transparent disclosure of financial results and other critical information to the public.

Good ethics and values promote growth and expansion, provide opportunities for the Company and our employees, strengthen our corporate governance and provide the necessary transparency for our stakeholders. This Code of Conduct sets out a framework for our behaviour as we conduct our business. Compliance with this Code of Conduct will reinforce the good image of our Company with all those who transact business with us, with the Company's shareholders and more importantly among ourselves. We will all appreciate the value of this Code and how, knowing that the Company adheres to the highest ethical, moral, legal and business standards, which includes a zero-tolerance to corruption in the workplace, it contributes to our self-esteem. Just as important are our founding principles of respect, reliability and trust which make Hikma and our employees good corporate citizens in a diverse global environment. Our aim is quality and excellence in all that we do.

Please read the Code thoroughly. Integrity starts with each and every one of us. Understanding this Code and adhering to its standards will enable us to achieve our goals in promoting the growth and success of our Company. This Code will not be a success unless we all provide our wholehearted cooperation and complete support. Every day as we conduct our business in line with this Code of Conduct, we safeguard the future of Hikma.

Thank you for understanding the importance of successfully implementing our Code of Conduct.

A handwritten signature in black ink, appearing to read 'Samih Darwazah'.

Samih Darwazah,
Founder
Hikma Pharmaceuticals PLC

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The Code of Conduct reinforces our Hikma values and high standards of conduct held by board members and employees. It challenges each one of us to understand and implement principles representing acceptable conduct in all aspects of our business. I am confident we shall all continue to demonstrate commitment to upholding integrity and accountability by working together to adhere to the Code of Conduct.

Said Darwazah,
Executive Chairman



Our Code of Conduct

This Code of Conduct (the “Code”) sets out the seven overarching principles and thirteen standards that we believe are central to maintaining the integrity of our business. Whoever we deal with and wherever we operate, we are committed to doing so ethically and in compliance with all local, national, and international laws and regulations.

This Code is supported by policies and procedures. These will assist employees and contractors who work on Hikma’s behalf to put into practice the good behaviours that this Code requires.

Each supporting policy should be treated as part of this Code and should be complied with at all times when conducting Hikma business.

Hikma is committed to communicating the requirements of this Code to all employees and to contractors when they work on Hikma’s behalf. Hikma also conducts an on-going programme of training and certification of staff on our policies and procedures to enable them to conduct their business in accordance with the standards of business set out in this Code.

Who Does This Code Apply To?

This Code applies to all full and part-time Hikma employees and all temporary staff across the worldwide Hikma group of companies. In addition, it sets out the principles and standards with which we expect third parties to comply when they conduct business for or on behalf of Hikma.

Sharing Responsibility and Supporting Each Other

We are each individually responsible for how Hikma delivers the principles and standards set out in this Code. Most importantly, we must all understand the requirements of this Code. However, this Code cannot cover every situation. Therefore, employees must also be able to exercise good judgement in addressing the situations that the Code

does not specifically mention and apply its spirit to those situations.

Managers across the group are responsible for showing leadership to their teams in the matters set out in this Code, to support their teams in understanding this Code, and for answering questions about its meaning and application.

If you are ever unsure of the meaning of any aspect of this Code or its application, or do not know how to respond to a situation that it does not specifically address, please ask questions.

In the first instance, your manager should be able to help you. However, you can also address questions to members of Senior Management, the Compliance Department, Legal Department and HR Department.

Our Overarching Principles

At Hikma we are committed to operating our business in line with the following seven overarching principles. These principles reflect the spirit of the obligations and responsibilities set out in this Code.

Quality

Hikma applies the highest standards of quality in everything that it does – its systems and processes, its manufacturing and operations and its products.

Reliability & Responsiveness

Hikma will be a consistent and dependable business partner. Hikma strives to meet or exceed customer expectations, will listen to the requests, suggestions and complaints of its customers, suppliers, and employees in good faith and respond accordingly and appropriately.

Dignity & Respect

Hikma respects the dignity and human rights of its employees and others. Privacy and confidentiality are essential to business and Hikma will respect the privacy of its customers, counterparties and employees, and is committed to maintaining the confidentiality of their information. Hikma is not discriminatory and offers equal opportunities to all.

Integrity

Hikma does not condone or participate in any form of corruption and refrains from doing business with those who do not meet its standards. Nothing ever compromises Hikma's commitment to business integrity.

Development

Hikma invests in its employees and makes it a priority to create opportunities for them to enhance their skills and knowledge in a safe and healthy work environment.

Transparency

Hikma will be open and honest in conducting its business. Hikma will provide stakeholders with relevant, accurate and timely information. Hikma's transactions will be recorded fairly and accurately and will be clearly reported.

Citizenship

Hikma recognises the role it can play in its communities and believes in giving back to those communities. Hikma will promote economic and social development, environmental responsibility, and supports diversity and social integration.

Our Standards

The Overarching Principles of this Code translate into the following standards of behaviour in the way that we conduct our business.

Anti-Bribery and Corruption

Hikma has a zero tolerance of bribery and corruption.



Hikma has zero-tolerance towards bribery and corruption. Hikma will not penalise any individual for complying with the principles enshrined in this Code or in our anti-bribery policies, even at the cost of forgoing a business opportunity, losing revenue or profit or disobeying a superior's instructions. Each and every employee must be committed to doing the right thing.

Mazen Darwazah,
Vice-Chairman, President &
CEO, MENA & EMAPAC



All directors, officers employees, and other individuals working for Hikma and joint ventures in which it has an equity control are prohibited from accepting, offering or giving, either directly or indirectly, money or anything else of value, as a bribe or inducement:

- to make, (or as a reward for making or not making), a decision that is favourable to Hikma's interests; or
- to seek to gain an unfair business advantage or otherwise influence business activities; or
- which compromises their judgement or their ability to act objectively.

This standard applies to interactions with all individuals and corporate bodies with whom Hikma does business – healthcare professionals, customers, suppliers, professional

bodies, regulatory authorities, and NGOs – regardless of where they are located geographically.

Hikma will undertake due diligence on business counterparties. We will not do business with third parties whom we find to engage in corrupt practices or who fail to meet the standards we require.

At Hikma we will:

- Act honestly, ethically and with integrity in all company interactions
- Not engage in or condone bribery or any other form(s) of corruption
- Not give or receive gifts or hospitality where this could give rise to a perception of a corrupt purpose

Failure to Prevent the Facilitation of Tax Evasion (Compliance with Criminal Finances Act)

Hikma does not tolerate tax evasion or the criminal facilitation of tax evasion.

All directors, officers, employees and those providing services to, for, or on behalf of Hikma should conduct themselves in accordance with this standard.

No employee or associate of Hikma should feel pressured into offering or agreeing to provide assistance to enable another person to unlawfully evade tax for any reason on behalf of or for Hikma. No employee or associate will suffer adverse consequences for refusing to agree to facilitate tax evasion or for taking steps to report any concerns that an offence has been committed.

At Hikma, we will:

- Carry out appropriate due diligence on new associates and regularly review existing associates
- Not engage in or condone the facilitation of tax evasion
- Provide appropriate training to all employees and directors in relation to this standard

Anti-Money Laundering

Hikma does not tolerate any business transaction or activity that would directly or indirectly support criminal acts or violate anti-money laundering or terrorism financing laws in any country in which Hikma operates.

All directors, officers, employees and those providing services to, for, or on behalf of Hikma ("**Associates**") should ensure that they comply with this standard.

Employees and Associates of Hikma must verify the identity of third parties and conduct appropriate due diligence checks prior to accepting funds from, or conducting business with, any third party in order to ensure that the source of funds is legitimate.

Employees and Associates must refuse to engage in any activity that, directly or indirectly, involves concealing or 'washing-off' the source of criminal proceeds so that they appear to come from legal sources, and must immediately report any knowledge or suspicion of money laundering to a member of the Legal Department.

No employee or associate will suffer adverse consequences for refusing to engage in money laundering activity or reporting any concerns that an offence has been committed.

At Hikma, we will:

- Carry out, internally or through recourse to professional independent reference institutions, appropriate identity verification checks and due diligence on new third parties and regularly review existing third parties.

- Not engage in or condone money laundering, terrorism financing or criminal activity.
- Provide appropriate training to employees and associates on how to identify and respond to risks of money laundering, terrorism financing and criminal acts.

Anti-Slavery (Compliance with Modern Slavery Act)

Hikma is committed to ensuring that "modern slavery" in the form of forced or compulsory labour and human trafficking does not take place in any of its businesses or supply chains across the globe.

At Hikma, we will:

- Train staff on labour standards and how to recognize and respond to any incidences of modern slavery
- Undertake periodic analysis and management of any modern slavery risk in Hikma's businesses or supply chains
- Carry out appropriate due diligence and engage on the issue with supply chain partners

Conflicts of Interest

Employees must not allow personal, family or business relationships to influence their professional judgement or the performance of their duties to Hikma. A conflict of interest arises where an employee's personal, social, financial or political interests influence that person's objectivity or independence with regard to the performance of their role with Hikma.

Hikma employees will:

- Declare to the company any external interests that they think give, or may give, rise to a conflict of interest
- Seek advice on concerns they may have about matters which may potentially conflict with their employment obligations
- Refrain from pursuing for personal benefit opportunities discovered through their position at Hikma
- Not enter into any undeclared arrangement in which personal interests conflict with those of Hikma
- Not participate in any decision at Hikma that involves any third party in which they or an immediate family member is interested
- Not accept gifts, hospitality or other entertainment of a nature that could be seen to compromise their independence or influence their professional judgement

Trading, Customers and Suppliers

Hikma will communicate in an open and honest manner with its customers and suppliers, subject to the requirements of confidentiality and competition constraints. Hikma believes in dealing with customers and suppliers fairly and in good faith in order to build successful, long-term relationships.

Hikma will engage in free and fair competition and not seek competitive advantage through unlawful means. Hikma will not collude with competitors on prices, bids or market allocations, nor exchange information with third parties in a way that could improperly influence business outcomes.

Hikma will comply with the requirements of trade regulations, restrictions and sanctions approved by recognised national and international authorities where they apply to the operation of our business.

At Hikma we will:

- Not acquire commercial information by dishonest, unlawful or unethical means
- Avoid deceptive and misleading statements in customer related activities such as marketing, sales and research
- Respect and protect suppliers' and customers' confidential and proprietary information and use it only for the purpose for which it was given
- Only exchange non-public or sensitive information about Hikma with third parties where necessary for legitimate business purposes
- Never engage in restrictive trade practices or make agreements that are anti-competitive
- Not do business in breach of recognised trade restrictions or sanctions

Hikma seeks to engage with customers and suppliers whose employment practices respect human rights and whose ethical standards meet the standards set by Hikma. A copy of the Code can be found on our website.



Product Information

Hikma is committed to the highest standards of quality for our products and the information supplied regarding them.

While ensuring compliance with the requirements of regulatory authorities in the jurisdictions in which we operate, Hikma seeks to provide customers with accurate and balanced information about its products.

Hikma sells and distributes its products through many different channels. Hikma is committed to communicating with customers in a proper and accurate manner, and complying with all standards set by applicable laws, regulations and local industry codes as a minimum. Products will only be promoted for their approved uses.

Hikma will provide timely responses to customer complaints in accordance with its regulatory obligations.

At Hikma we will:

- Present products in an ethical, appropriate and fair way
- Comply with local laws and regulations and applicable industry pharma codes of practice in the promotion of products
- Only provide customers with properly approved and authorised marketing information

Communications, Disclosures and Records

Hikma is committed to high standards of transparency. We will communicate clearly with stakeholders in relation to our business, governance and financial position. Hikma will engage in transparent accounting practices and maintain accurate books and records.

Hikma seeks to ensure that all communications are timely, accurate and clear and give a fair and transparent view of their subject matter, whether or not this is favourable to Hikma.

At Hikma we will:

- Maintain books and records that present a transparent, fair and accurate picture of our business activities and financial position
- Maintain information management systems to ensure that our records are maintained in compliance with applicable legal, regulatory, environmental, tax, employment, and trade requirements
- Provide investors with relevant and accurate information and make timely disclosure of relevant financial and non-financial information
- Respond openly and clearly to shareholder questions on matters of governance and the group's business
- Set out an analysis of our governance and demonstrate clear communication with shareholders in our Annual Report and Accounts



Employment Matters

Hikma operates a discrimination-free working environment and is committed to promoting a culture of respect, dignity and equal opportunity in which employees' individual rights are protected.

Hikma believes that the diversity of its workforce is highly valuable. Hikma is committed to providing an environment in which individuals can flourish based on talent, experience, and performance and where potential is recognised and encouraged.

Hikma is opposed to all forms of forced or child labour.

At Hikma:

- Discrimination is not tolerated and equal employment opportunities are provided to all
- No forms of violence, bullying or harassment are tolerated
- Employees' right to free association and collective bargaining are recognised and respected
- There is a clear, transparent process for receiving employee suggestions, requests and complaints
- Effective communication with employees is promoted, so that issues arising from business decisions are addressed appropriately and in a timely fashion
- Employee rights are safeguarded and employment laws and regulations are complied with
- The need for training and development is recognised as central to the on-going development of our people, and their skills and knowledge
- There is a fair and transparent system for management of reward and promotion

Employee Personal Information

Hikma will respect and protect the security of employees' personal data.

At Hikma:

- Appropriate safeguards are in place to protect the privacy of employees and the security of their personal information
- Only personal information required for legitimate business, human resources or legal purposes will be collected or retained
- Individuals are informed of the purposes for which their personal information may be used

- Personal information is only shared with third parties who need to know it for a legitimate legal purpose
- Data protection and associated laws applicable to the countries in which we gather and hold personal information are complied with

Health and Safety

Hikma is committed to providing for its employees a safe and secure working environment.

At Hikma:

- Health and safety policies are developed, consistently applied, enforced and updated to protect employees from avoidable injuries
- Employees' well-being at work is looked after
- Individuals are trained to understand the hazards associated with their work, so that risks can be appropriately managed
- Health and safety laws and regulations are understood and complied with to protect both workers and visitors in our facilities
- Employees enjoy a work environment that is free from substance abuse, and benefit from a worldwide "no smoking" policy across all factories and office buildings

Community Impact and Support

Hikma is committed to benefitting the communities in which it works through charitable donations, volunteering and the operation of its social and environmental policies.

Hikma addresses the global health agenda through community engagement and health awareness campaigns. Hikma collaborates with community groups to support public policies that promote economic and social development, whilst respecting the local cultures in which it operates. Hikma supports the use of local business in its activities and seeks to recruit locally where possible.

Hikma gives financial support to local and regional causes, and donates medicines through legitimate registered charities and approved NGOs to support communities in crisis. Hikma also undertakes volunteering activities in our communities, focussing on education, patient welfare and the healthcare agenda.

At Hikma we are committed to:

- Encouraging employees to participate in local health awareness campaigns
- Supporting employee volunteering in local community projects and as part of the Hikma Global Volunteering Day
- Participating in civic affairs for the advancement of economic and social development
- Ensuring that none of our community or charitable activities gives rise to conflicts of interest

The Environment

Hikma strives to protect the natural environment in which it operates, and sees sustainable development as a key element of its role as a responsible business.

Hikma continues to work to reduce its impact on the environment, focussing in particular on minimising waste, analysing carbon emissions, monitoring and reducing energy usage, and minimising demands for water consumption.

At Hikma, we are committed to:

- Encouraging employees to participate in Hikma's environmental activities
- Promoting sustainable development through on-going initiatives to reduce waste, increase recycling and reduce energy consumption
- Training and educating our employees on the impact of the business on the environment and ways to minimise this impact



Protection of Property, Systems and Funds

Hikma's assets should not be misappropriated and should be used only for the purposes of undertaking the company's business. Assets should not be used for personal gain, nor for any fraudulent purpose.

It is the duty of all Hikma employees to protect the assets of the group, including its confidential and proprietary information, funds and equipment.

Hikma employees will:

- Refrain from taking any action that could compromise the integrity of Hikma's computer, communications or security network or systems
- Comply with company policies on the security of systems and protection of confidential information
- Not misappropriate company assets or use them for purposes other than that of their employment

Insider Trading and Confidential Information

All officers, directors and employees of Hikma are prohibited from trading on the basis of "inside information" for their own or others' personal profit.

No officer, director or employee of Hikma can use any non-public information about the Company or other companies learnt through their employment to influence their, or anyone else's, decision to purchase or sell shares.

Confidential information should be protected from improper disclosure. Any communication of confidential information should be limited to those individuals who need to know that information.

Hikma employees will:

- Comply with all applicable regulations relating to insider trading and market abuse
- Comply with the Group's Share Dealing Code, including the prohibitions on trading during close periods

- Seek guidance from the Company Secretary as to whether information of which they are aware is "inside information" relevant to dealing in the Company's shares
- Protect our confidential information and only communicate to others, inside or outside the Company, if authorised
- Report potentially significant business developments to senior management to allow them to be analysed in the context of our obligations of disclosure
- Ensure that confidentiality agreements are in place with third parties with whom confidential information is shared

Public Affairs and Governmental Interaction

All public affairs activities undertaken by or on behalf of Hikma must be conducted ethically and must align with relevant local law requirements.

At Hikma we will:

- Work with public authorities to support the agenda for public health and safety in our capacity as a manufacturer of pharmaceutical products
- Communicate with law makers and other public officials to help shape public policy on law and regulations in matters that could affect Hikma's business
- Not make political donations, nor illegally or unethically use company resources to support any political organisation or campaign.

Hikma employees will:

- Not improperly involve Hikma in political activities and campaigns
- Not engage in any public affairs activities other than where specifically authorised to do so
- Respect the role that government has to play in the organisation and regulation of society at large
- Ensure that all interactions with governmental officials, including in relation to regulatory and product registration matters, are conducted in accordance with group policy, and the anti-bribery and anti-corruption provisions of this Code
- Have the right to be involved in political activities in their own time as private citizens, but must be clear at all times that these activities are not undertaken on behalf of Hikma.

Speaking Up

Hikma wishes to encourage an environment in which full, free, and frank discussions can be held on issues that concern our employees. Therefore, Hikma has always had an open door policy regarding communication. Furthermore, we must hear from those who have any concerns about the ethics and integrity of our business.

As part of your commitment to this Code, you have a duty to report to the Company as soon as possible any suspected violations of the Code, its supporting policies or any applicable law or regulations of which you become aware.

Always remember that:

- Issues are best resolved early on, so that the potential for harm to Hikma, our employees or our counterparties, partners and communities is reduced
- Wherever possible and appropriate, such reports will be kept confidential and the information provided will only be shared with those individuals who need to know it
- Hikma management will not tolerate any form of harassment or retaliation against persons making such reports
- Any reprisals or retaliation taken or threatened because of a report made under this Code would themselves be a violation of this Code

In most cases, such reports should be made directly to a line manager or supervisor. In cases in which this is not possible or is inappropriate, the group's compliance officers are eligible and qualified to receive such reports. Where permitted, confidential reporting lines are also available. Details of other contacts are set out in our Guide to Speaking Up.

To ensure compliance with this Code, Hikma may investigate complaints and may conduct interviews as part of investigations. Inquiries and investigations will be conducted with appropriate concern for the reputations of the individuals involved. Employees are expected to abide by Hikma's policies, to cooperate fully, and provide accurate and truthful information in any investigation that the Company may undertake.

Wherever possible and appropriate, the identity of individuals, the process, content and result of investigations and Speak-Up Line reports will be kept confidential and will only be shared with individuals who need to know it, and after taking adequate measures to protect the identity of reporting individual(s).

Hikma has an obligation to protect the confidentiality of all parties involved in an investigation, and therefore may be unable, in some instances, to advise the reporting employee of the status of the investigation.

Non-compliance with this Code or any of its supporting policies, including a failure to report a suspected or known breach, can represent serious misconduct, and may result in disciplinary action being taken.

Comments

Hikma will continue to train its employees on the principles and standards set out in this Code, and the policies and procedures that underpin its operation.

This Code, and the policies and procedures that support it, are the responsibility of the **Board of Directors** and the **Compliance, Responsibility and Ethics Committee of Hikma Pharmaceuticals PLC**. The Committee always appreciates feedback, and this should be directed to the Compliance Department of Hikma Pharmaceuticals PLC for onward communication to the Committee and its members.

www.hikma.com
