



Employee Code of Conduct

**Operating with Integrity:
Own It!**

A Letter From Our Interim Chief Executive Officer



SCOTT HIRSCH

Dear team members,

Endo plays a critical role in bringing healthcare to people in order to help them live their best lives. Working in this industry means we also carry the responsibility to support the wide array of stakeholders we serve, including our colleagues, shareholders, regulators, healthcare professionals, the community and, importantly, patients. They are all counting on us to deliver upon our business goals and to do so with integrity every step of the way.

Our shared values of Integrity & Quality, Collaboration, Drive, Innovation and Empathy define who we are as a Company and how we should operate. Similarly, Endo's Code of Conduct (our "Code") is designed to help you make the right decisions that align with these values in your everyday business interactions. Our Code contains a summary of Endo's major policies and standards that provide guidance on how to operate in the highly regulated industry in which we work. We are asking you to hold yourself accountable and work in accordance with our Code to help us cultivate a culture of compliance within our teams.

Our business strategy calls on us to be a force for good—to adopt more sustainable practices that positively impact our stakeholders. This includes the way we approach compliance and ethics. Our reputation—as a company, as leaders, and as individuals—is shaped by the way we conduct our business. As we work to bring innovative, high-quality products to people in need, we must always operate with integrity.

I encourage you to use the Code as a reference point and a guide for the important work you do every day. When we live out our values and our Code, we can be proud of all we achieve by improving the lives of patients who are made better by our products, and always doing the right thing, for the right reasons.

Best,

Scott Hirsch

Interim Chief Executive Officer

A Letter From Our Chief Compliance Officer



SUSAN WILLIAMSON

Dear fellow team members,

Operating with integrity and delivering our products with a quality mindset are shared values across our Company. We ask you to do the right thing, even when no one is watching. This foundational behavior is key to maintaining a culture of compliance and ethics at Endo. It is critical for any company, and particularly for us, given the highly regulated industry in which we work. Our Code is designed to help you navigate this environment so we can more effectively achieve our mission of developing and delivering life-enhancing products through focused execution.

While the Code is a useful tool, operating with integrity is something for which everyone must take responsibility—we all need to “own it.” Our Code is not intended to provide an exhaustive list of every policy you need to know; rather, it is an ethical compass to guide your daily activities. There are three simple things to remember when it comes to owning it: (1) know the rules; (2) act with integrity and respect; and (3) speak up.

The goal of our Corporate Compliance and Business Practices team is to continue to build and evolve a foundation of ethics and compliance within Endo that helps enable our Company to achieve its vision, while following our policies and procedures, as well as applicable legal, regulatory and industry standards. Compliance leaders are embedded across our business, serving as a resource for all team members. Should you ever have a question or need guidance pertaining to the Code or any compliance matter, our team stands ready to collaborate and help you.

Thank you in advance for your attention to the Code and for your commitment to operate with integrity and respect at all times. No written code or policy by itself can guarantee compliance with the law or ethical decision-making. Each of us has a personal responsibility to know and live by the policies and operating procedures that are designed to protect our business. We all need to own this, and our Code will help you do that.

Sincerely,

Susan Williamson

Chief Compliance Officer

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Our Code enables us to achieve our vision and mission and is an embodiment of our shared values.

Our Vision

Helping everyone we serve live their best life.

Our Mission

We develop and deliver life-enhancing products through focused execution.

Our Values



How We Behave Matters...

Our values represent our beliefs and what we stand for as a Company. We bring these values to life through our behaviors and actions. **Our behaviors** are action-oriented and provide guidance on how to embody our values in our everyday work.

Keep these behaviors in mind as you review our policies and procedures that are outlined in **our Code of Conduct**. Together, they guide us to behave and act in ways that allow us to carry out our business objectives.

Integrity & Quality: **Own It**

- Mean what you say. Say what you mean.
 - Make yourself proud in a job done right.
 - Act like an owner. Do it right, even when no one is watching.
-

Collaboration: **Unite with Purpose**

- Work together toward one goal with no hidden agendas.
 - Together we achieve more.
 - Work hard, but support each other harder.
-

Drive: **Be Action-Biased**

- Wake up determined. Go to bed satisfied.
 - Be on a mission to deliver on our mission.
 - Be relentless in your pursuit of excellence.
-

Innovation: **(re)Invent a Better Way**

- Ask “why,” then “why not?”
 - Ride the wave of curiosity—it leads to discovery.
 - Walk out of the past to step into the future.
-

Empathy: **Listen with Your Ears and Your Heart**

- Learn why it matters to the customers we serve.
- Understand others’ perspectives, whether you agree or not.
- Put aside your ego and listen without judgment.

Operating with Integrity

Own It!

What does “own it” really mean when it comes to operating with integrity and to the Code of Conduct?

It means we are asking you to hold yourself and others accountable to the rules of our business and our industry. There are three key things to remember:

Know the Rules: Educate yourself about the policies and procedures that are specific to your role. The Code is a summary of many of our core policies and procedures. You can find the full policies on our Company intranet: at.endo

Act with Integrity and Respect: Reinforce the importance of ethics and compliance by behaving in a way that is consistent with our Code when you work in teams or lead those teams. Show respect for your colleagues, our customers and all the stakeholders with whom we do business. In other words, “walk the talk.”

Speak Up: Report behavior inconsistent with the Code. We encourage you to report potential concerns in a confidential manner without fear of retaliation. We have a number of ways for you to do that and they are summarized within this Code.



OWN IT!



Know the Rules

Quick Facts About Our Code of Conduct

Applies to every person conducting business for Endo

Applies to all locations, affiliates and subsidiaries

Defines how we interact with patients, healthcare providers, customers and payors, suppliers, government officials, the healthcare community, shareholders, and each other

All officers and employees must certify, in writing or electronically, that they have reviewed, read, understand and will abide by this Code

Due to local law in some countries, certain provisions may be supplemented or superseded by policies or standards to address local requirements

When Endo standards differ from local requirements, always follow the more restrictive standard

Rules to Remember

- Respect and value our fellow team members, business partners, competitors, customers and the patients we serve
- Act with honesty, fairness, integrity and personal accountability
- Never compromise your integrity for the sake of achieving a business objective

Do you have specific questions?

Here are some additional resources to consult:

- Your Manager
- Corporate Compliance Business Leaders
- Human Resources
- Legal Department
- Ethics Hotline

[See the Directory of Resources in the back of this Code for contact details](#)

OWN IT!

- On an annual basis, read and certify that you understand the Code
- Continue to use the Code as a reference guide throughout the year
- Be sure that you understand and apply any policies that are specific to your role at Endo and the region in which you work. These policies can be found on our Company intranet: [at.endo](#)



Act with Integrity & Respect

Every Endo team member has a role to play in helping us embody a culture of compliance within our business. The Code will help guide your actions, but it cannot anticipate every situation. If you have any doubts about a potential course of action, ask yourself the following questions:

- Is it legal?
- Is it ethical and consistent with our values?
- Is it consistent with our Code of Conduct?
- Is it in line with Company policies?
- Am I being truthful and honest?
- Will it reflect positively on our reputation?
- Would I feel comfortable if it were reported in the news or to someone I respect?

If you still have questions, always seek additional guidance. You are not alone when faced with a tough ethical decision. If the answer to any of these questions is “no,” do not do it. It is never permissible to disregard our Code of Conduct or applicable policies to achieve a business or personal objective.

Respect in the Workplace

We are committed to cultivating, valuing and embracing every person’s distinct voice. This includes promoting an environment where team members are treated with respect at all times. We welcome the diversity of thought and engagement that comes from the differences in our race, religion, gender (including gender identity or expression), national origin, color, sexual orientation, status, age or other characteristics protected by local laws. These dimensions enable us to contribute unique ideas and perspectives that help fuel our innovation and drive success. Importantly, we want all team members to feel safe and experience a sense of belonging when they come to work.

We all have a responsibility to make this happen. Promoting a culture of diversity, equity and inclusion is not a standalone initiative; it is embedded across our business. It starts with how we recruit, retain and develop leaders with diverse backgrounds, knowledge and experiences. We are working to foster a culture of inclusion so that each person feels acknowledged, valued and respected. Doing so will help us better understand and support the needs of our diverse patients and customers.

Attention Leaders

All leaders and managers across the Company play an important role in fostering a culture of compliance and ethics. Your responsibilities include:

- Setting the right example through your own words, actions and behaviors in line with Endo's Values and this Code
- Reinforcing the importance of annual trainings of the Code and other job-specific policies
- Encouraging open-door policies for reporting concerns, asking a question or sharing an idea
- Educating team members about all the avenues available to report a concern
- Holding vendors and consultants responsible to act in a manner consistent with this Code
- Maintaining a collaborative partnership with the Compliance team
- Taking appropriate disciplinary actions in consultation with human resources, compliance leaders and legal partners



OWN IT!

- Make sure your actions are in line with our Code; do what is right, even when no one is watching
- If you are a manager, remember you have an important role to play in building a team environment that promotes a culture of integrity, respect and compliance



OUR CODE IN ACTION:

I have questions about whether a proposed business plan complies with Company policy but worry that my manager will assume I do not know how to perform my job. What should I do?

First, be sure you have consulted the relevant Company policies. If you still have a question, please know that Endo encourages and expects employees to raise questions. Managers are expected to foster an environment where everyone feels comfortable doing so and are likely the best people to speak with first. Your Corporate Compliance, Human Resources or Legal business partners will also be in a position to provide guidance. You may also raise the issue through Endo's Ethics Hotline. If you have a question, it is your responsibility to ask and Endo's expectation that you will ask.



Speak Up!

You play an important role in helping us meet the standards reflected in our Code of Conduct. If you witness behavior that is inconsistent with the Code, we need you to report it. Reporting your concerns is easy. Here is how it works...

How to Raise a Concern

Endo offers several channels to raise concerns. You should use the channel that is most comfortable for you. Generally, your supervisor or manager may be in the best position to address an issue. However, that is not your only option. You can also discuss your concerns with or ask questions of:

- Direct Management or Senior Management
- Corporate Compliance Business Leaders
- Human Resources Business Partners
- Legal Business Partners

Ethics Hotline

Endo also has an Ethics Hotline through which reports can be made at any time by phone or online, including anonymously where allowed. Toll-free international numbers are available at www.endo.ethicspoint.com for every country with Endo employees. All reports, whether submitted by phone or online, will be issued a reference number. You may use that reference number to provide further information or check the status of an investigation by phone or online at www.endo.ethicspoint.com, regardless of how you originally used the hotline. Please note that investigations take time and our ability to share information may be limited.



Anonymity and Confidentiality

Endo takes reports of alleged misconduct very seriously and will investigate them to determine if any law, Company policy or aspect of our Code of Conduct may have been violated.

Where permitted by local laws, you may use the Ethics Hotline to anonymously report known or suspected issues or ask a question. Some countries prohibit or discourage anonymous reporting or restrict the types of information that may be reported. If you use the Ethics Hotline from one of those countries, you will be advised of any specific reporting restrictions.

The information you report will be treated as confidentially as possible. Your report will be shared only with those who need to know about it to answer your question or to investigate the matter. Should you choose to identify yourself, Endo will make every reasonable effort to keep your identity confidential, while at the same time meeting its obligation to fairly investigate the matter. In some instances, Endo may be required to reveal your identity, if known.

Non-Retaliation Policy

No form of retaliation or intimidation against an employee who makes a report of a suspected violation or otherwise participates in good faith in any investigation of a suspected violation will be tolerated. Employees who engage in retaliation or intimidation will be subject to disciplinary action, up to and including termination. Endo reserves the right to discipline anyone who knowingly makes a false accusation, provides false information about the Company or its employees or has acted improperly.

Disciplinary Actions

Any employee who violates this Code, Company policy or applicable laws or otherwise engages in misconduct may be subject to disciplinary action, up to and including termination, in line with local policies and procedures. Misconduct includes violations of this Code and Company policies, failure to raise a known or potential issue, not cooperating with an investigation or intimidating or engaging in retaliation against an employee who raises a potential issue or provides information during an investigation.



OWN IT!

- If you witness or suspect inappropriate behavior, a Code violation or illegal activity. Speak up!
- Remember, there are several methods available for reporting a concern or asking a question without the fear of retaliation, discrimination, harassment or any other inappropriate response



OUR CODE IN ACTION:

One of my direct reports asked me to discuss a potential concern regarding misconduct. How should I respond?

Your response is extremely important. Allow adequate time to discuss the potential concern in an appropriate location. Listen as much as possible and do not be defensive. You should not feel required to give an immediate answer. Reassure the team member that the Company takes reports of misconduct very seriously and appreciates the potential concern being raised. Depending on the potential concern, you may need to involve Human Resources, Corporate Compliance, Legal or your management. It is important to note that issues raised around data breaches or safety concerns may also require you to make additional reports internally. Treat a team member who raises an issue with respect and do not retaliate against or attempt to intimidate them in any manner.

**IN THIS SECTION
YOU WILL
LEARN ABOUT:**

- Good Operating Practices
- Monitoring the Safety, Performance and Quality of Our Products
- Promoting Our Products
- Interacting with Healthcare Professionals and Healthcare Providers
- Government Inspections and Requests

OWN IT!



**CHAPTER 1:
ENDO & THE
HEALTHCARE
COMMUNITY**

Patients, healthcare providers, customers, consumers and healthcare regulators expect safe, effective and high-quality products from trusted partners. Our Code calls on us to act responsibly, lawfully and with integrity in our relationships with all members of the healthcare community. Maintaining these principles in our daily activities is critical to sustaining trust in our products and fulfilling our vision and mission.



Good Operating Practices

Maintaining the quality of our products is critical to patient safety and to our success. Quality is what patients and the healthcare community expect of us. We meet these expectations by embedding quality principles into all our activities and by adhering to applicable laws and practices.

We conduct manufacturing operations in compliance with all applicable regulatory requirements and current Good Manufacturing Practices (cGMPs) and follow rigorous internal quality control procedures within our sites. Employees are required to complete job-specific trainings regularly to support these quality metrics. Our suppliers and partners are also subject to these standards and operate in compliance with applicable regulatory requirements and cGMPs.

Our employees are our greatest asset when it comes to identifying risks to product quality and compliance. If a task or action cannot be completed as planned or an unexpected result is generated (i.e., a deviation), it must be reported so that it can be properly evaluated. Equally important are identifying and reporting risks. It is important that leaders record and take action to address both deviations and risks reported to them and encourage their teams to be vigilant so the Company can continuously improve its operations.

Special Rules and Regulations for Controlled Substances

Special rules and regulations apply to the handling, storage and transfer of controlled substances. We must strictly comply with these requirements and our policies and procedures related to controlled substances. If you have any knowledge or suspicion about the improper handling, transfer, loss or diversion of a controlled substance, you are required to follow applicable reporting procedures. If you are unsure about how to report, immediately report it to your manager or the Ethics Hotline.

Failure to report suspected diversion or a theft of our products is a violation of this Code and may subject an employee to disciplinary action, up to and including termination.

OWN IT!

- Maintain and follow written policies and procedures that define our standards for delivering high-quality products
- Complete all training in a timely manner
- Maintain accurate and complete records
- Report and follow up on potential instances of non-compliance or where there is a risk of failure, injury or error to help prevent deviations and incidents from occurring



OUR CODE IN ACTION:

We are behind schedule and under pressure to increase production. May we slightly modify a few manufacturing steps to speed things up?

Although we strive to continuously make our manufacturing processes more efficient, our commitment to quality is paramount. Always follow our quality standards and approval processes when considering a modification to a manufacturing process. Discuss your potential process improvement with your management and site quality leader to assess if it is feasible and consistent with our quality standards.

I walked past an area in the factory and saw equipment being handled in a way that may not follow current Good Manufacturing Practices or be safe. However, I am not trained on that job, so I may be wrong. Should I raise this?

Although we take every effort to design tasks and processes to be safe and compliant with current Good Manufacturing Practices, the task design or its implementation may not be perfect, and you may be the first person to see it. By raising the issue with your manager or through the Quality or Safety leader, you could prevent injury or quality issues with the product. With everyone looking out for the patient and their Endo colleagues, we have the best chance of success.



Monitoring the Safety, Performance & Quality of Our Products

Patient health and safety are top priorities at Endo. Maintaining the quality of our products and the continued monitoring of their performance is paramount to protecting the safety of patients. We conduct periodic reviews and analyses of safety information and take responsible and appropriate actions to improve the safety profile of our products.

We also have a responsibility to detect and report adverse events and quality complaints associated with our products, including unfavorable side effects, dosing errors, misuse, malfunctions and concerns about performance or efficacy of a product. The Company has established a process to address product-related queries, complaints and adverse events in a timely and efficient manner. Please visit our Directory of Resources page to access the links and phone numbers you can use to report an adverse event or quality complaint.



- All team members are required to promptly notify their business unit within one day about any potential safety issue or incident
- If you are unsure whether an adverse event has occurred or whether an incident is reportable, report it through the designated channels and allow our experts to make that determination



OUR CODE IN ACTION:

While on vacation, a fellow traveler mentioned that he felt nauseous after taking one of our products. Do I have to report this conversation?

Yes. Although our product may not have caused an adverse event, those qualified and responsible for such determinations should be notified and make the decision. Report the conversation for appropriate review and analysis so that any potential reporting requirements are met and so we fulfill our commitment to patient health and safety.



Promoting Our Products

Endo is committed to promoting our products based on the approved use of each product and the needs of the patient. Our interactions with healthcare professionals should be focused on educating them about the appropriate use of our products and supporting their medical education and training needs for the purpose of improving patient care.

We require truthful, on-label and ethical communications that will help healthcare professionals make informed and independent decisions about how they can use our products for their patients. Prior to the use or dissemination of any written or verbal advertising or promotional piece, the material must be approved and authorized by a promotional review committee of Company subject matter experts. These pieces must be on label, accurate, balanced, not misleading and comply with applicable legal, regulatory and local standards.

OWN IT!

- Only use promotional materials and communications that have been approved for use or dissemination
- Do not promote the use of any product beyond its approved labeling and authorization
- Provide fair balance by presenting the full picture of our products, including a summary of all safety information
- Do not mischaracterize or make unfair comments about competitors' products



OUR CODE IN ACTION:

During one of my sales calls, a doctor mentioned that her colleague used one of our products with good results for patients suffering from conditions not indicated in our label. She asked for information from scientific literature about off-label uses. I am aware of recent studies from an industry conference I attended. Can I share that information?

No. In your role as a sales professional, you may only discuss on-label information. Your obligation is to refer her to our Medical Information department, which can provide complete and accurate scientific information in a manner that is consistent with Company policy.



Interacting with Healthcare Professionals & Healthcare Providers

Endo educates healthcare professionals about our products, collaborates with them on research, relies on their expertise as advisers and trains them on the approved use of our products. Interactions with these professionals are governed by the respective country’s laws, regulations and standards. Our interactions must always reflect our commitment to integrity, compliance, accuracy and transparency, including adherence to our standards on prohibiting bribery and corruption.

Endo also promotes scientific integrity and does not allow business objectives to improperly influence the vital collaboration with the healthcare community that advances scientific and medical understanding of our products or specific disease states. The research studies that Endo supports must have a legitimate scientific objective, be approved by the appropriate Endo scientific and medical reviewers and be conducted with scientific rigor. Additionally, all consulting arrangements with healthcare professionals must be reviewed and approved by appropriate management, medical and compliance reviewers, and payment must be at fair market value.

OWN IT!

- Engage healthcare professionals only when there is a bona fide need and always pay a fee that is consistent with the local fair market value for the service rendered
- Never attempt to buy business or provide anything of value to influence a healthcare provider’s judgment to choose an Endo product, whether it is real or perceived
- Colleagues and business partners must never offer, promise, authorize or provide a payment or benefit that is intended to improperly influence a government official, healthcare professional or any other person, including commercial entities and individuals, in exercising their responsibilities
- Your interactions with healthcare professionals, healthcare institutions and others in the healthcare community should comply with all applicable laws, regulations, professional requirements, or industry codes of conduct or practice, including local transparency and anti-kickback regulations
- Provide appropriate instruction, education and training on the safe and effective use of our products



OUR CODE IN ACTION:

An approved physician speaker is presenting at an Endo sponsored educational program for patients who may benefit from using one of our products. Can the physician customize the handouts and revise our approved slides?

No. Our educational and promotional materials are developed through a rigorous review process. It is never permissible to use unapproved materials or modify approved materials or visual aids.

We are having a hard time introducing local physicians to one of our recently approved products. One recommendation is to conduct a study and enroll local physicians as investigators. This will allow them to get acquainted with our product and enhance our efforts to introduce it. Is this ok?

No. Studies must have scientific merit, may only be conducted to serve a scientific purpose and should never be intended to “seed the market” or promote a product.



Government Inspections & Requests

We operate in a complex and dynamic regulatory environment. Effective engagement with regulators is critical to our ability to deliver safe, effective and high-quality products to the patients and healthcare providers we serve. Our facilities and activities are routinely inspected by healthcare regulators and other regulators around the world. At all times, Endo cooperates with these authorities and endeavors to maintain a reputation of integrity. In the event of a non-routine request for information or a facility visit, the Legal department must be notified immediately. The Legal department represents the Company on all legal matters and determines the appropriate information to be provided and will facilitate our cooperation with investigative authorities.



- Cooperate with and be courteous to government inspectors, and coordinate with our quality, safety and regulatory experts in response to regulatory inspections and requests
- Always provide regulators with honest, accurate, responsive and timely information
- Be familiar with your site's procedures for complying with a request to access the premises
- Contact the Legal department immediately in the event of a non-routine or legal inquiry, such as a subpoena, summons or legal notice



OUR CODE IN ACTION:

How should I respond to an inspector's question about a process with which I am not familiar?

Be truthful and forthright. It is okay to state "I don't have an answer" and tell the inspector that you will get the answer as soon as possible. Consult with your manager and Quality Assurance lead, and never guess, provide incomplete information or answer questions that you do not fully understand.

**IN THIS SECTION
YOU WILL
LEARN ABOUT:**

- Antitrust and Fair Competition Laws
- Anti-Corruption and Anti-Bribery
- Pricing and Billing Information
- Competitive Intelligence
- Political Activities and Contributions
- Trade Restrictions



**CHAPTER 2:
OUR CUSTOMERS,
SUPPLIERS &
GOVERNMENT
OFFICIALS**

Endo interacts with many types of individuals and entities, including healthcare professionals, healthcare institutions, government officials, regulatory authorities, managed care and group purchasing organizations, suppliers and vendors. These interactions may arise in our sales and marketing, research and development and manufacturing operations, as well as in our import/export activities. In all business dealings, Endo will be fair and honest and will comply with applicable law and Company policies.



Antitrust & Fair Competition Laws

Antitrust and competition laws focus on ways that businesses compete on quality, price and services. Many countries have fair competition laws. These laws generally prohibit anti-competitive practices and the exchange of information that may harm competition. Examples of anti-competitive practices may include agreements to fix prices or boycotting suppliers, customers or competitors.

We are committed to competing fairly and following the antitrust and competition laws of all countries in which we operate. These laws are complex and vary by country, so it is critical that you consult with the Legal department before interacting with competitors or engaging in business dealings that could unfairly restrict trade.

OWN IT!

- Do not discuss, exchange information or enter into agreements with competitors about prices, strategic plans, terms or conditions of sale, production or distribution, or allocation of products, territories, markets or customers, and do not use third parties as conduits for any such discussions, information exchanges or agreements
- Do not discuss or plan joint behavior (such as boycotts) toward customers, suppliers or competitors
- Do not make false or disparaging comments about competitors or their products or steal or misuse competitor trade secrets
- Do not manipulate a competitive bidding process



OUR CODE IN ACTION:

I am attending a local industry association meeting and several competitors are discussing their marketing and pricing strategies. What should I do?

Although industry meetings have legitimate purposes, they create risks for anti-competitive discussions. A group of competitors discussing issues of mutual concern could cross a line into an anti-competitive topic. If you find yourself in a situation where a topic seems inappropriate, leave the discussion immediately and make it clear to those present that you are leaving due to the nature of the conversation. You should also report the issue to the Legal department as soon as possible.



Anti-Corruption & Anti-Bribery

We conduct our business in a transparent and ethical manner. We prohibit any and all forms of bribery and corruption, including any such conduct by our third-party intermediaries. It is strictly prohibited to offer, promise, authorize or provide anything of value to any person—including government officials as well as those working in the private sector—to improperly influence them, win or retain business or otherwise gain an unfair business advantage. The solicitation and acceptance of bribes from any person is also prohibited.

As regulators, payors or purchasers of our products, government officials are integral to our business. We may interact with government officials or entities through our research and development, regulatory, manufacturing and import/export activities. Our interactions with government officials therefore must comply with applicable anti-corruption laws.

Endo must also ensure that it does business with third parties that deliver services in a manner that is consistent with Endo's values, because Endo may be liable for the corrupt conduct of third-party intermediaries that act on its behalf. We therefore do not do business with third-party intermediaries that engage in conduct that we are prohibited from engaging in directly.

OWN IT!

- Do not offer or provide bribes to anyone in the public or private sector, and do not solicit or accept bribes from anyone
- Be vigilant in the screening, selecting and monitoring of third-party intermediaries
- Manage all third-party intermediaries so they are aware and comply with all anti-corruption and anti-bribery policies
- Be aware that in countries with nationalized or public healthcare systems, healthcare professionals may be considered government officials



OUR CODE IN ACTION:

I plan to engage a contractor to oversee the construction of the new site. The contractor must obtain building permits from the local authorities who are insisting on a small incentive payment to process the permit application. May I provide an incentive payment to the contractor?

No. Any form of payment used to exert improper influence over healthcare professionals or government officials is prohibited, regardless of the customary practices in the country. Remember, when Endo's standards differ from local requirements, always follow the more restrictive standards. The size of the payment is irrelevant, and a third-party intermediary such as a contractor cannot make an improper payment on Endo's behalf.



Pricing & Billing Information

We have a legal and ethical responsibility to provide transparent pricing information to governments, private payors and healthcare providers. The submission of inaccurate pricing information or submission of fraudulent claims to a government healthcare program could subject our Company to substantial fines and penalties.

OWN IT!

- Always provide accurate and complete information to government and private payors
- Adhere to Company policies on obtaining approval for, documenting and communicating lawful discounts, rebates or administrative fees
- Utilize accurate and complete information about billing, coverage, reimbursement and coding that adheres to local law and industry codes



Competitive Intelligence

Endo employees are encouraged to appropriately collect, share and use information about our competitors (“competitive intelligence”). However, just as we value our own non-public information, we respect the non-public nature of certain information about our competitors. We use only ethical and legal means to gather competitive intelligence.

It is always acceptable to gather competitive intelligence through publicly available information. Publicly available filings, presentations, news, journal articles and publications are legitimate sources of competitive intelligence. You may also ask third parties about competitors or accept competitive intelligence offered by third parties as long as there is no reason to believe the third party is under a contractual or legal obligation not to disclose the information or has gathered the information illegally or unethically. If there is any indication that the information was not lawfully or ethically received or gathered, refuse to accept.

OWN IT!

- Never attempt or ask a third party to acquire information through unethical or unlawful means, such as misrepresentation, deception, theft, spying, bribery or by breaching a nondisclosure agreement
- If there is any indication that information you obtained was not lawfully or ethically received or gathered, refuse to accept it
- If you receive competitive intelligence anonymously or information that is marked confidential, do not review it and contact the Legal department immediately



OUR CODE IN ACTION:

I am hiring a researcher from a competitor. What questions may I ask about his or her prior employer?

Never ask a former employee of a competitor about any information that the person is under a legal obligation not to reveal. This would include trade secrets and other confidential information. Consult with the Legal department about necessary precautions to avoid improperly soliciting such information.



Political Activities & Contributions

Endo educates policymakers through well-informed policy positions on issues that impact our business. Our participation in the political process is appropriate and ethical and adheres to applicable laws. Many countries regulate the political activities of corporations. Only certain individuals in Government Affairs may engage in lobbying activities on behalf of the Company. All employees are required to consult with Government Affairs regarding potential political activities.

Endo recognizes and encourages the right of our employees to participate in the political process as individuals. However, you may only participate on your own time and at your own expense. Company funds, facilities or assets may not be used for personal political activities.

Endo is permitted to and has established a Political Action Committee (“Endo PAC”) in the U.S., which allows the Company to support candidates and organizations whose policies and legislative efforts are aligned with our Company’s mission to develop and deliver life-enhancing products. Contributions to the Endo PAC are entirely voluntary. No employee will be favored or disfavored based on his or her contributions.



- No corporate contributions for a candidate for any office should be made by or on behalf of Endo outside of the Government Affairs department
- Do not engage public officials without first consulting with Government Affairs
- In personal civic and political affairs, clearly indicate that your views and actions are your own, not Endo’s
- Do not use Endo funds or other assets, such as telephones, email accounts, conference rooms or stationary to assist a candidate, public official or political committee



OUR CODE IN ACTION:

A friend is running for local office, and I would like to help him with his campaign. Is this allowed?

Yes. Your personal political activities are your own—not Endo’s. Just make sure not to use Company resources including Company time, email or the Company’s name to advance the campaign.



Trade Restrictions

Most countries regulate the flow of materials, information, services and funds into and out of their territories. We must comply with licensing requirements, boycotts, embargoes and other trade restrictions that have been approved by recognized national and international authorities. Such requirements may relate to chemicals, biological materials, equipment, finished products and data/technology, among other items.

Endo will not engage in business with countries or parties subject to trade sanctions unless lawful and properly authorized. We also comply with export/import controls, licensing, clearance requirements and customs laws for the countries in which we do business. Endo will provide accurate and truthful information about our products and other items (such as pharmaceutical ingredients) to customs and other relevant authorities. Endo will not cooperate with any requests to participate in international boycotts as prohibited by law.

OWN IT!

- Maintain and complete accurate import declarations, and review the export classification of materials prior to export to determine if a special authorization is required
- Know your customer and supplier, and screen your transactions against all applicable rules that prohibit improperly dealing with sanctioned countries, persons or entities
- Do not cooperate with illegal restrictive trade practice or boycotts
- If your responsibilities involve international dealings, maintain your knowledge of and compliance with current import/export controls, licensing requirements and trade restrictions, which change frequently due to political and security threats



OUR CODE IN ACTION:

I am trying to clear a product through customs. The local customs agent is asking for an additional signature to satisfy local requirements. I know it is customary to offer something to “speed things up.” Time is of the essence. If local customs are not cleared quickly, patients may be adversely impacted by a supply shortage. What should I do?

First, understand the current import/export requirements for the country involved. Determine if further authorizations are in fact required by local law. Never provide gratuities to any officials to facilitate preferential treatment, regardless of the unwritten “law of the land,” (i.e., local practices). Seek the advice of your manager or the Legal department to identify legally acceptable ways to secure a timely release of our product.

**IN THIS SECTION
YOU WILL
LEARN ABOUT:**

- Protecting Our Employees
- Maintaining an Inclusive Work Environment Free of Discrimination, Harassment and Retaliation
- Protecting our Environment
- Our Commitment to Patients and Communities



**CHAPTER 3:
OUR WORKPLACE
& OUR
COMMUNITIES**

Endo seeks to create a productive work environment that reflects our values and attracts qualified and talented employees with diverse backgrounds. This involves striving to maintain a safe workplace and to preserve our environment while always adhering to environmental and safety laws. As a Company, we aim to improve patient health and are committed to appropriate partnerships with third parties that further these goals. We also support the global and local communities where we work and live.



Protecting Our Employees

Endo employees are our most valuable assets. The safety of our team members at our manufacturing facilities, labs and offices is of the utmost importance. We have a responsibility to each other to maintain the safety and security of our work areas. Our site-based safety programs are designed to monitor our work zones, educate team members about best practices and record and/or report any safety issues so that we can learn from them and continuously improve.

A Drug-Free Workplace. Endo is also committed to maintaining a work environment free from the influence of any substance that could impair our ability to safely and professionally execute our job responsibilities. Selling, purchasing, possessing or using any illegal drug on Endo property or while conducting Endo business is prohibited. Note: This prohibition includes marijuana, which remains illegal under U.S. federal law, and use of a legal medication without a prescription.

An Environment Free of Violence. Workplace violence of any type, including acts or threats of violence to another person, or behavior that causes others to feel unsafe, is prohibited and will not be tolerated. It is prohibited to possess firearms, weapons, fireworks or explosives while taking part in any work-related activity. It is also prohibited, to the maximum extent under applicable law, to possess such items on or near areas of Company property, including in a Company-provided motor vehicle.

OWN IT!

- Immediately stop any activity that creates a safety risk, and promptly report any safety concerns
- Participate in safety training and adhere to Company safety and security policies
- Never use alcohol, illegal drugs, controlled substances or medication in a way that might harm your ability to conduct Endo business
- Do not engage in violent or physically threatening conduct while on Company property at any time or off Company property during working time or while taking part in any work-related activity
- Promptly report any threatening or violent behavior



OUR CODE IN ACTION:

As an employee, if I feel the work I am doing is creating a safety risk for me or others, do I need to notify my supervisor or manager first before stopping work?

Our employees' safety always comes first. Everyone at Endo is empowered to immediately stop any activity that creates a safety risk. After the work is stopped, be sure to report the issue to your manager so the risk can be addressed, and work can resume safely.



Maintaining an Inclusive Work Environment Free of Discrimination, Harassment & Retaliation

Endo is committed to fair employment practices in its dealings with all employees and applicants. You must comply with all applicable labor and employment laws, including laws prohibiting discrimination and harassment. You must also comply with laws prohibiting retaliation for reporting discrimination, harassment or other protected activities in violation of Company policy or the law. Laws related to freedom of association, privacy and protected, concerted activities must also be followed. It is your responsibility to understand and comply with the Company's policies on these subjects, which are designed to comply with applicable laws and regulations. Failure to comply can result in civil and criminal liability against you and the Company, and will result in disciplinary action against you, up to and including termination of employment. You should contact Human Resources if you have any questions about the Company's policies against discrimination, harassment and retaliation. For more information, please visit the Company's intranet site: at.endo.

An Equal Opportunity Workplace. The Company is committed to providing equal employment opportunity and fair treatment to all applicants and employees on the basis of merit and prohibits discrimination based upon race, color, national origin, religion, ancestry, physical or mental disability, medical conditions, genetic information, marital status, pregnancy status, gender (including gender identity or expression), age, sexual orientation, veteran or military status or any other classification protected by applicable law.

An Environment Free of Harassment. The Company is committed to providing a workplace free of unlawful harassment. This includes not only sexual harassment, but also harassment based on any protected classifications, as referenced above in the Equal Opportunity Workplace section. The Company strongly disapproves of and will not tolerate harassment of employees by managers, supervisors, co-workers or non-employees. Similarly, the Company will not tolerate harassment by its employees of non-employees with whom the Company does business. Endo expects employees to treat each other with respect, dignity and sensitivity.

Reporting Your Concerns Without Retaliation. The Company also strictly prohibits and will not tolerate retaliation against an employee who has raised or reported in good faith, a violation of the Company's policies against discrimination and harassment, or who has engaged in any other protected activity.

You are required to promptly report any concerns about discrimination, harassment or retaliation against you or another person to your manager, to Human Resources or through Endo's Ethics Hotline or website. All such complaints will be treated with sensitivity. Any member of management who has reason to believe that an employee has been the victim of discrimination, harassment or retaliation or who receives a report of such conduct must immediately report it to Human Resources or the Legal department.

The Company will conduct or direct a prompt, thorough, fair and impartial investigation of any report of alleged discrimination, harassment or retaliation using qualified personnel. All reports or complaints of conduct in violation of this provision will be handled as confidentially as possible. The Company will conclude the investigation in a timely manner. If the Company determines that a violation of its policies against discrimination, harassment or retaliation has occurred, appropriate corrective and remedial action will be taken, including possible termination of employment. Failure to fully cooperate with or to give truthful information in connection with a complaint investigation may also result in disciplinary action, including and up to termination of employment.



OWN IT!

- Discourage and report any behavior, actions or verbal or written communications that are inappropriate, offensive or derogatory to you or anyone in a protected group
- Jokes, slurs and other remarks about characteristics that are protected by law or of a sexual nature are never appropriate
- Remarks or physical conduct that interfere with another person's work or create an intimidating, hostile or offensive work environment are not tolerated
- Treating a colleague less favorably than other colleagues because of a protected characteristic is absolutely prohibited
- Familiarize yourself with your region's applicable laws prohibiting unlawful workplace discrimination, found on the Company's intranet site: [at.endo](#)



OUR CODE IN ACTION:

One of my colleagues makes seemingly innocent and complimentary comments about the appearance of a peer. Is it appropriate?

Compliments must be kept at a professional level, with an appropriate tone of voice and demeanor. Compliments must not contain sexual innuendo or references that may reasonably be construed as sexual in nature. Whether a particular "compliment" violates Company policy will depend on the specific nature of the comment, the frequency of the comment and the overall context. If in doubt about the appropriateness of a comment, do not make it. Remember, your intent does not matter. Just because you think a comment is a compliment does not mean it is welcomed by the recipient or other colleagues. Intimidating, hostile or offensive comments should be reported to your manager, Human Resources, Legal or through the Ethics Hotline.

One of my co-workers emailed an inappropriate "joke" to me about a fellow employee. I found it offensive, but I do not know how to address my concern.

Offensive or inappropriate behavior is not acceptable. For example, these are strictly prohibited: offensive and unwanted sexual advances, propositions, touching, communications and/or the display of sexually suggestive objects or pictures on Company equipment or in the workplace, as well as offensive, derogatory remarks or "jokes" about a person's age, race or other protected characteristic. You can discuss your concern with your manager or with the Human Resources department or make a report via the Ethics Hotline.



Protecting Our Environment

Endo strives to act in an environmentally responsible way. We recognize that our activities can have an impact on the environment as we source materials, manufacture products, consume energy and generate waste. Endo is committed to operating our business in a responsible manner that seeks to minimize the environmental impact, while promoting the safe, efficient and responsible use of global resources. Specifically, our team has worked to recycle, reuse and reduce materials throughout our global locations, apply technology to support better water conservation within our manufacturing sites and conserve energy with more efficient facilities management. All employees are responsible for compliance with applicable legal and regulatory requirements on environmental matters.

We partner with external suppliers that are similarly committed to operating in a responsible and ethical manner, respecting the rights of the individuals they employ and helping to protect the environment. We expect our suppliers to operate in a manner consistent with our Supplier Code of Conduct and the Pharmaceutical Supply Chain Initiative (PSCI) Principles for Responsible Supply Chain Management.



OWN IT!

- Comply with all applicable company procedures and environmental laws, and report any environmental incidents
- Take appropriate measures to reduce or eliminate the creation of waste and conserve resources



OUR CODE IN ACTION:

Is it okay to not report a chemical spill if the spill is small?

All spills and potential releases should be reported regardless of their size.



Our Commitment to Patients & Communities

Supporting the communities in which we live and work is important to Endo. We know our communities are stronger when businesses, non-profits and third parties come together to address challenges. Through our employee volunteerism, community grants and healthcare partnerships, Endo is committed to addressing healthcare disparities and is working to create positive change across our global community.

Community Partnerships

Endo supports non-profit organizations with community-based, philanthropic grants focused on: organizations committed to providing basic necessities and services (food, shelter, access to healthcare) to people in need as well as STEM (Science, Technology, Engineering and Mathematics) programming for children and young adults. The Company partners with non-profits across the globe, with focused giving in the communities and regions where Endo offices are based.

Healthcare Partnerships

Through the Healthcare Partnerships Program, the Company supports 501(c)(3) organizations that are working to educate and support patients as they manage their health, as well as professional and non-profit organizations that are working to expand access to care for at-risk populations.

Non-profits can apply for a Community Partnership or Healthcare Partnership grant on Endo’s website.



- Volunteer your time in communities where you live and work
- Direct all non-profit inquiries to Endo’s website, where they can read about the initiatives the Company supports and find out how to apply for a grant



OUR CODE IN ACTION:

I would like to organize a day for my team to volunteer our time at a local non-profit organization to show our support for our community. Is that allowed?

Yes, we want to be a force for good and encourage employees to volunteer their time to assist their local communities. Please visit the Giving Back in Our Community page on at.endo and learn how the Company can help you identify a non-profit organization in your area.

**IN THIS SECTION
YOU WILL
LEARN ABOUT:**

- Conflicts of Interest
- Insider Trading
- Intellectual Property and Confidential Information
- Privacy
- Financial Integrity
- Company and Information Technology Resources
- Company Records and Information Management
- Corporate Affairs and Investor/Media Relations
- Social Media

OWN IT!



**CHAPTER 4:
OUR COMPANY
& OUR
SHAREHOLDERS**

We are all expected to operate in the best interests of Endo and our shareholders, be forthright about our operations and performance and exercise care in the use and protection of our assets and resources.



Conflicts of Interest

Nothing you do in your professional life or during your free time should conflict with your responsibility to act in the best interests of Endo. A conflict of interest arises when the prospect of personal gain may improperly influence your ability to conduct Endo's business in a fair and just manner. Examples may include using your position for personal gain; outside employment interfering or competing with your Endo employment; referral of Endo business to a firm with which you have a personal relationship; or soliciting or receiving gratuities from suppliers or vendors.

When a personal or family relationship, including a romantic relationship, could impact your decision-making or the decision-making of another Endo employee or the hiring, supervision or evaluation of any employee, you must disclose the situation to your manager, Legal, Human Resources or Corporate Compliance business partner. You should disclose such relationships if there is even the potential for the appearance of a conflict. You must avoid situations where you are directly supervising, reviewing, hiring or otherwise could be perceived to have influence over a close friend, romantic partner or family member.

Endo deals with suppliers and others doing business with us in a fair and objective manner without favor or preference.

There may be instances in which a perceived (rather than a real) conflict of interest exists. In those instances, the Company will work with the employee to promptly address the appearance of or actual conflict of interest. When in doubt, for the protection of the Company and the individual, the employee should fully disclose to the Company the nature of the proposed conduct or transaction before it is undertaken. Some actions will require the prior approval of the Company.

OWN IT!

- Disclose to your manager, Legal, Human Resources or Corporate Compliance business partner outside activities and employment relationships, financial interests or relationships that may present an actual or potential conflict
- Obtain approval from your Legal or Corporate Compliance business partner before accepting an officer or director position with an outside business or serving on a non-profit board
- Do not seek or solicit any gifts, gratuities, services, trips, entertainment or benefits from those doing business or seeking to do business with Endo



OWN IT!

- Do not give or accept—directly or indirectly—in kind or in cash, gifts, entertainment or benefits of more than token value by local standards from those doing business or seeking to do business with Endo, and avoid any perception of a potential conflict of interest
- Do not allow personal relationships to conflict with your Endo responsibilities



OUR CODE IN ACTION:

My neighbor, who is a close friend, owns a company that supplies certain materials to Endo. Is this a conflict of interest?

Although not explicitly prohibited, it would be appropriate to disclose this to your manager. If appropriate, your manager will work with the Legal department and your Corporate Compliance business partner to find the best solution. You must not attempt to influence Endo's decision to engage in business with your friend's company. If you are in doubt of whether you should disclose a relationship that may be considered a conflict, it is always best to disclose it and let your manager provide you with guidance.

How do I understand if an offer of a meal or entertainment from a supplier is appropriate? I did not solicit the invitation, which I know would be impermissible.

Invitations to social events, working luncheons or other business-related events are to be evaluated individually on their merit as a business activity. If there are any concerns about accepting such invitations, the employee should consult with his or her manager.



Insider Trading

Many countries have laws regarding insider trading. As an Endo employee, you may learn of inside information—information that is not known to the general public and that an average investor might consider important when deciding whether to buy, sell or hold securities. You may not disclose this information to others. No Endo employee may engage in any transaction in Endo or another company's securities while he or she is aware of inside information.

Illustrative examples of potentially inside information are: information about a potential business acquisition; internal information about revenues, earnings or other aspects of financial performance that have not yet been publicly disclosed or that depart from what the market would expect based upon prior disclosures; important business developments (including research and development results, regulatory approvals or non-approvals of one of our products); and the acquisition or loss of a major customer or an important transaction.

Certain employees, known as “restricted personnel” under our Insider Trading Policy, are more likely to have inside information and are prohibited from trading in any securities during “restricted periods” as defined in our policy.

OWN IT!

- Never purchase or sell or direct anyone else to purchase or sell any type of security while you are aware of inside information about Endo or any other company
- Be familiar with Endo's restricted periods and whether you are restricted personnel, subject to a restrictive trading period due to a heightened risk of you possessing inside information
- Do not directly or indirectly disclose (“tip”) inside information to anyone, including family members and friends, even if you do not intend for the recipient to use the information to buy or sell securities
- Do not talk to investors or analysts about Endo's business—these interactions are strictly managed by our Investor Relations team
- Contact our Chief Financial Officer or Chief Legal Officer if you have any questions



OUR CODE IN ACTION:

I recently learned that Endo is actively negotiating a joint venture with a publicly traded company that I have been researching as a potential investment. May I still purchase stock in this company?

No. Trading while in possession of material non-public information is illegal. The prohibition applies to trading in the stock of Endo or the other company, even if you have an unrelated reason for trading the stock.



Intellectual Property & Confidential Information

Intellectual property and confidential information are valuable assets for the Company. Protecting them is critical to our growth. This includes our patents, trade secrets, trademarks, copyrights, know-how, data, processes, experience, customer information and technical and business knowledge. Additional examples include sales and marketing databases, marketing strategies and plans, pricing information, manufacturing techniques and research and technical data.

Every Endo employee must protect our intellectual property and maintain the privacy of our confidential information. Even after employees leave Endo, they must continue to respect our intellectual property and not disclose confidential or proprietary information, regardless of whether they execute a separation agreement. Unauthorized use of the intellectual property or confidential information of others is also prohibited.



- Do not discuss confidential information in public places
- Respect valid patents, copyrights, trademarks and other intellectual property rights of others
- Understand your responsibilities regarding new inventions and ideas that you develop as an Endo employee
- Do not develop new products with a third party without a written agreement that properly addresses ownership and other intellectual property rights
- Do not use confidential information or intellectual property from other companies or persons, unless Endo has the legal right to such use



OUR CODE IN ACTION:

I overheard Endo employees discussing company business on a train. What should I do?

If you believe the information is sensitive or confidential, advise the parties they can be overheard and contact the Legal department. Every Endo employee has a responsibility to protect confidential and proprietary information from inappropriate use or disclosure.

What can I do as an employee of Endo to safeguard our intellectual property?

Consult with Endo's Intellectual Property legal counsel before soliciting, accepting or using confidential information; disclosing Endo's confidential information; or permitting use of our intellectual property.



Privacy

As a global company, our strategy and daily operations necessitate the collection, use and, at times, sharing of personal information about patients as well as our customers, shareholders and employees. Respect for the privacy of personal information earns the trust and confidence of patients, customers, shareholders and employees. We are committed to adhering to applicable privacy laws worldwide.

All individuals have rights to the way their personal data are handled. During the course of our activities, we may collect, store and process personal data about our employees, customers, suppliers and other third parties, and we recognize that the careful and lawful treatment of this personal data will maintain confidence in our organization and will provide for successful business operations.

Many countries and jurisdictions in which Endo operates have laws that govern how we treat personal information. Before engaging a vendor or other third party to assist with any handling or sharing of personal information, particularly personal information of patients, make sure to consult with the Privacy Office and the Legal department as needed, so that appropriate safeguards can be put in place to comply with privacy laws in the United States and abroad. Always follow Endo's policies and processes for sharing personal information of employees, patients or others, and pay particular attention to policies regarding sharing that information with Endo's subsidiaries that operate outside the United States.



OWN IT!

- Avoid collecting, using or accessing personal information unless you have a legitimate business purpose and are authorized to obtain the information, in compliance with applicable laws
- Collect the minimum necessary information and whenever possible, do not collect information that identifies a specific person
- Do not share personal information with unauthorized individuals or entities and respect the privacy preferences of individuals about how their personal information may be used
- Take reasonable steps to appropriately secure personal information— particularly sensitive personal information such as health information— in accordance with Company policies and applicable laws
- In the event of an actual or potential loss or unauthorized disclosure of personal information, immediately report the incident to the Privacy Office via the following email: privacy@endo.com or to the Ethics Hotline: endo.ethicspoint.com



OUR CODE IN ACTION:

One of our vendors had a security problem with one of their data systems that contains personal information of Endo employees. What should I do?

Report this to the Privacy Office via privacy@endo.com immediately. Endo will assess whether there may have been a security breach involving personal information and determine an appropriate response based on this assessment. Prior to initiating a relationship with a vendor who handles personal information on our behalf, steps should be taken to confirm that appropriate policies and safeguards are in place.



Financial Integrity

To fulfill our commitment to our shareholders, the public and government agencies, our books and records must fairly represent in all material respects the financial condition, operational results and cash flows of the Company. Endo employees are responsible for being aware of and adhering to our system of internal financial controls and Company policies. Always exercise great care when handling financial transactions and reporting for the Company to maintain the accuracy of Company accounts and to protect the security of Company funds.

Endo's internal controls are designed to provide reasonable assurance regarding the effectiveness and efficiency of our operations, the reliability of our financial reporting and our compliance with applicable laws and regulations. You should always assist in taking corrective actions in the case of a control failure, reporting any policies or procedures that are not being followed and identifying control weaknesses.

OWN IT!

- Prepare and maintain accurate and complete Company records
- Only sign or approve records you believe to be accurate and complete after appropriate review
- Financial transactions must be appropriately authorized, be recorded in the accounting period in which they were incurred and be in the appropriate accounts with supporting documentation
- Be transparent and do not withhold information from our independent or internal auditors
- Never falsify records, misrepresent facts or circumvent our controls



OUR CODE IN ACTION:

My manager asked me to ship to my distributors double the amount of product we typically sell to boost our quarterly sales figures. What should I do?

Do not compromise your integrity. The practice of knowingly selling more products than your distributors can sell is illegal. Raise this issue with your finance or compliance leader or your Legal department partner. You may also contact the Ethics Hotline.



Company & Information Technology Resources

Each of us is entrusted with the proper use of the Company's data systems and technology resources. Although the occasional personal use of our systems (for reasons that do not conflict with the business of the Company and do not violate any of its policies) is allowed, these systems and resources are for conducting legitimate business of the Company. Unless otherwise mandated by local law, you should not have any expectation that information you store on or send to or from Company systems will be "private." Endo systems or devices should never be used to send or access inappropriate, harassing, discriminatory, sexually explicit or defamatory material. Endo may inspect your files or other information contained on its servers or other property, including devices, at any time and without prior notice.

Our Information Technology (IT) team manages our systems and devices, and works to maintain their security by carefully managing any software or hardware required for our business. Employees must always consult IT before downloading any software application. It is also important to safeguard Endo's confidential information. Therefore, employees must not share their system passwords.

OWN IT!

- Safeguard your system passwords
- Do not leave Endo computers or devices unattended in places where they could be accessed or misused by unauthorized persons
- Treat all computer data as confidential
- Do not record communications without proper authorization and only as otherwise permitted under local law
- Strictly adhere to the Company's technology resources policies



OUR CODE IN ACTION:

I am looking for ways to engage with my team in a remote manner. Through my research I came across a web platform that I think would be very beneficial and easy to use. Can I sign up for and use the computer software to collaborate with my team?

All business activities must be conducted using Endo-approved software and systems. These systems and software undergo a security assessment designed to reduce the risks associated with using these services. You may not install the app or software without advance approval from IT.



Company Records & Information Management

Endo employees must accurately create, maintain, store and, when appropriate and in compliance with policy, destroy Company records in a manner that protects the integrity of the information. Effective records management facilitates sound decision-making, promotes operational efficiency and is integral to addressing our legal, financial, regulatory and contractual obligations.

Company records are viewed broadly and include records in all mediums, such as paper (including handwritten notes), audio or video recordings and computer-based information, including emails and electronic files. You should comply with Company records management policies and retention schedules. Requests by third parties (such as governmental agencies), lawsuits or other inquiries may necessitate the need to hold records beyond normal retention schedules. It is Endo policy to preserve any records relevant to a “legal hold” or any other “hold order” issued.

You may never take or use Company records (including any work-related emails) to further your personal interests of any kind, including in connection with any disagreement or dispute between you and the Company.

OWN IT!

- Retain records for the time period specified by applicable laws, Company policies and retention schedules
- If you receive a hold order, take special care to retain all documents or other records relevant to the hold order
- Comply with all Endo policies and guidance documents and complete all training requirements concerning Company records, information management, data integrity, privacy and information security
- Never conceal, alter or destroy records relating to an imminent or ongoing investigation, lawsuit or inquiry
- Never leave Company documents unattended in public places, and report any accidental loss or destruction of documents



Corporate Affairs & Investor/Media Relations

Endo is committed to delivering accurate, reliable, timely and fact-based information to financial analysts, investors, the media and members of the public. To facilitate the appropriate provision of information, outside inquiries related to Endo or our business units should be directed to Corporate Affairs or Investor Relations. Endo employees should not make statements to the media or investors about the Company's business without appropriate authorization. Any media or investor inquiries should be immediately sent to Corporate Affairs or Investor Relations.

If an Endo employee is contacted by a representative of a government agency, an attorney or a representative of an attorney seeking an interview or making a non-routine request for documents, you should not provide any information and should immediately contact the Legal department.



- Do not provide any information about Endo or its businesses to outside sources, including the media, financial analysts, governmental officials, attorneys or their representatives without appropriate authorization
- Always refer media to Corporate Affairs and investors to Investor Relations
- If you are asked for information about current or former employees (including for a job reference check), refer the request to Human Resources
- If contacted by a government agency related to an inquiry, politely inform the government representative that as a matter of Company policy you are required to refrain from providing information until you have contacted the Legal department



OUR CODE IN ACTION:

I have been asked to speak at a conference about my areas of expertise at Endo. Can I do this?

Invitations to speak on your area of expertise as a representative of the Company should not be accepted without prior approval from your manager, functional Senior Vice President or business unit leader, as well as Corporate Affairs. If your presentation may reveal confidential information or impact our ability to protect our intellectual property, you should consult with the Legal department. All presentations must be reviewed and approved by Corporate Affairs in advance.



Social Media

Company Communications

Endo understands the value of social media to connect with stakeholders. Just like all official Company communications and promotions, social media content that mentions our products must be approved through the appropriate review process. Employees must not create original product-related content or add to any product-related posts without prior approval using established Company review processes.

Personal Social Media

When engaging in activities on social media for personal reasons, Endo employees should use sound practical judgment and behave reasonably to avoid revealing sensitive or proprietary information. Endo employees should never use personal social media accounts to engage in business-related discussions, including any engagements with outside contractors or influencers (e.g., endorsements).

The guidance provided in this Code of Conduct applies to employees' conduct on social media when representing our Company or when engaging with other fellow employees.



- Endo employees that engage in social media as a personal activity must be aware of, and abide by, the Endo Social Media Policy, which can be found on the Company's intranet: [at.endo](#).
- Do not create content about the Company's products on social media without internal Company approval
- Under no circumstance should an employee give advice to individuals about treatments, medical diagnoses, trials or other related medical information about Endo products on personal social channels



OUR CODE IN ACTION:

I am excited about our upcoming product launch. Can I post something on my own LinkedIn, Facebook or Instagram page to tell everyone about it?

No, you cannot post original content about our products without prior approval from the established Company review process. For product-related posts, U.S. employees can re-share or "like" the official Endo social media posts. However, you cannot add commentary unless pre-approved by the Company. Please reach out to the Corporate Affairs team with further questions.



Directory of Resources

If you need more information or want to ask a question about any matter covered in the Code, just ask. There are many resources available to you. Below, please find a quick reference guide:

Topic of Interest	Who to Contact?
To report behavior not in line with our Code	The Ethics Hotline is managed by an external third party and is operated 24 hours a day. Details are available at www.endo.ethicspoint.com .
Corporate Compliance	Find your Corporate Compliance Business Partner on the Company's intranet site: at.endo This site also contains information about Company policies and procedures. To email an inquiry, use this address: CorporateCompliance&BusinessPractices@endo.com
Legal	Find your Legal Business Partner on the Company's intranet site: at.endo To report a potential privacy breach: privacy@endo.com
Government Affairs & Community Affairs	external.affairs@endo.com
Investor Relations	relations.investor@endo.com
Media Relations Social Media	media.relations@endo.com communications@endo.com
Human Resources	human.resources@endo.com
Medical Information	To report an adverse event or quality complaint: Call: 1-800-462-3636 for Endo USA, Inc. Call: 1-800-828-9393 for Endo USA, Inc. – Injectable Solutions and Generics Call: 1-888-867-7426 for Paladin Pharma Inc. US Only: Fax or email the information using the AE_PC form located on at.endo



