



PARTNERING WITH INTEGRITY

BUSINESS PARTNER CODE OF CONDUCT



We Do What's Right

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WE DO WHAT'S RIGHT

At Allergan, our ethical conduct and the success of our company go hand-in-hand. We keep integrity at the heart of everything we do.

About the Allergan Business Partner Code of Conduct

At Allergan, we do what is right and keep integrity at the heart of everything we do. We maintain high standards for conducting business ethically and in accordance with applicable laws, regulations, guidelines and industry codes.

Allergan is committed to integrity in its business activities and strives to abide by the highest ethical, social and environmental standards, and accordingly, Allergan only conducts business with individuals and organizations who share our commitment to high ethical standards and who operate in a responsible manner.

The Allergan Business Partner Code of Conduct outlines the ethical standards by which we conduct our business and our expectations of our Business Partners – all third parties including: suppliers, distributors, service providers, consultants, contingent workers, agents and vendors who conduct business with us on our behalf.

In addition, the Business Partner Code of Conduct is aligned with the Pharmaceutical Supply Chain Initiatives ([PSCI](#)) and [UN Global Compact Principles](#).

The Business Partner Code of Conduct is not intended to replace, supersede or conflict with any applicable legal or regulatory requirement or contractual obligation with Allergan.

Our Expectations of Our Business Partners

We require our Business Partners to operate with the same high standards, commitment to integrity and adherence to the principles outlined in this Business Partner Code of Conduct when working with Allergan.

It is up to each Business Partner to determine how to meet and demonstrate compliance with the principles and standards, as stated in this Business Partner Code of Conduct.





WE ENSURE PATIENT SAFETY AND PRODUCT QUALITY

Allergan is proud of our products and works to ensure they are developed under high quality and safety standards. We never jeopardize patient safety, product quality or compliance.

Researching and Developing Allergan Products

At Allergan, our research and development activities are focused on identifying and introducing new products that address unmet medical needs while increasing global access to high-quality, affordable medicines that enhance our patients' quality of life.

Developing safe products is a priority we all share. It applies to all phases of the life cycle of our products, from development through patient use. That's why we strive to exceed the most stringent standards that apply to our company. Patient safety and the integrity of our programs drive our research and development efforts, and we never sacrifice quality to meet a company target or deadline.

We are committed to treating the subjects of our research ethically and safely. We aim to protect the health, safety and well-being of human research participants and respect the laws, regulations and culture of the countries where our studies are conducted. Where it is necessary to use animals in research, we conduct such animal research in a responsible and humane manner.

Allergan supports the development and adoption of non-animal test methods to reduce and replace animal testing. We expect our Business Partners to share in the commitment to develop and support safe products and to protect the health, safety and well-being of research participants.

Accurate Product Information

We carefully and diligently assess the risks and benefits of our products before bringing them to market. It's critical that patients and physicians understand these risks and benefits before making treatment decisions, which is why we take our responsibility to provide complete, accurate and honest information about our products very seriously, and expect our Business Partners to do the same.

We ensure the claims we make about our products are accurate, fair, balanced and consistent with approved product labeling. We take our obligation to provide trustworthy information about our products seriously.

Allergan is committed to publishing medically important results, whether positive or negative from its clinical research and disclosing our

support for any publications that result from research financially supported by our company.

Quality Products

At Allergan, we develop our products with patients in mind and are dedicated to ensuring they receive safe, high-quality products. Our commitment to quality has allowed us to earn the trust of patients and physicians around the world, and we maintain their trust every day. Data integrity is an important component of our responsibility to ensure the safety, efficacy, and quality of our products, and of our commitment to protect our patients.

Adverse Event Reporting

Reporting and monitoring adverse events is one of the ongoing ways we ensure the safety of the products we place on the market and the patients that use them. Allergan has both a legal and ethical obligation to report this information to government regulatory authorities. Business Partners should report Adverse Events in accordance with the law, Adverse Event training supplied by Allergan, and their contractual agreements with Allergan.



WE INTERACT RESPONSIBLY

At Allergan, we always act with integrity and adhere to high standards of ethical and professional behavior. By interacting responsibly, we earn the trust of healthcare providers, each other and the community.

Compliance With Laws and Regulations

We work in a highly regulated industry and require our Business Partners to conduct business ethically and in accordance with applicable laws, regulations, guidelines, industry codes, the Allergan Code of Conduct and our policies.

Product Promotion

Patients and physicians rely on our company to promote our products honestly and in accordance with the law. We ensure the information provided in our promotional materials and communications is accurate, reliable and balanced.

Allergan Business Partners who engage in promotional activities on behalf of Allergan must provide reliable, accurate and complete information about our products and should only promote in ways that are truthful, non-misleading, fair, balanced and consistent with approved product labeling.

Business Courtesies

Business courtesies (e.g., modest meals, hospitality and nominal gifts) provided to customers of Allergan on behalf of Allergan may be permitted in limited situations and only as directed by Allergan. Business Partners must ensure any business courtesies provided on behalf of Allergan cannot be misinterpreted, suggest something improper or be viewed as influencing a business decision.

Interactions With Healthcare Professionals and Government Officials

At Allergan, we routinely interact with healthcare professionals (HCPs) and provide them with information to help them make medically educated treatment decisions. We observe high standards of integrity and demonstrate our commitment to patient care in every aspect of our relationships with HCPs and government officials and require the same of our Business Partners.

Business Partners may not offer HCPs or government officials an improper inducement (including any payment, kickback, bribe or rebate) to influence prescribing behavior, purchases, recommendations or formulary decisions.

Transparency

Allergan is committed to transparency in all aspects of our business, from how we record financial transactions and interact with healthcare professionals, to how we document the results of clinical trials.

We never engage in any activity that would compromise the professional judgment of our organization, suggest favorable treatment or give the impression to others that we operate dishonestly in any way. We require the same level of commitment to transparency in all aspects from our Business Partners.





WE INTERACT RESPONSIBLY (continued)

At Allergan, we always act with integrity and adhere to high standards of ethical and professional behavior. By interacting responsibly, we earn the trust of healthcare providers, each other and the community.

Business Partner Relationships With Other Third Parties

The relationships we've built with our Business Partners are based on a foundation of mutual trust and respect.

We expect our Business Partners to do business with integrity, and to be responsible for maintaining ethical relationships with Allergan, as well as with all vendors and other third parties engaged on our behalf.

Anti-bribery and Anti-corruption

Bribery and corruption can harm communities, the marketplace, our patients and customers and can damage our reputation.

Allergan does not offer improper incentives, nor do we allow others to do so on our behalf in exchange for a favorable business decision, a business advantage, or as a reward to an individual for a favorable business decision or a business advantage given in the past.

Fair Competition

Allergan advances our business and maintains patients' trust based on the quality and merit of our products.

We support a free and open market and comply with competition laws everywhere we do business. We avoid discussions about competitively sensitive matters and agreements that inappropriately limit competition or violate the law, including discussions and agreements with competitors to fix prices or terms of sale, dividing markets, customers or territories or preventing competitors from entering the market.

We strive to always compete fairly and expect the same from our Business Partners.

Trade Compliance

As a company that exports and imports products and information to countries around the world, we are subject to laws that regulate how, and with whom, we can do business. We comply with all applicable trade laws and the laws of all countries that govern transactions, including any applicable boycott laws and trade sanctions.

We expect the same level of commitment to comply with all relevant trade laws and regulations from our Business Partners.





WE PROTECT OUR COMPANY

At Allergan, our relationships, assets and brand are what allow us to drive results. We lead with integrity so that we can effectively serve our stakeholders by protecting our company assets, information and records.

Conflicts of Interest

A conflict of interest occurs when personal interests interfere, or give the appearance of interfering, with the interests of our company or if an individual uses a relationship for personal gain. Such conflicts could arise from personal relationships, financial interests, business ventures or inappropriate offers of gifts or entertainment.

At Allergan, we make objective decisions and work to avoid situations that can create, or appear to create, a conflict of interest, and we expect the same of our Business Partners.

Confidential Business Information

At Allergan, our intellectual property, trade secrets, proprietary information and other confidential business information provide our company with a competitive advantage and could cause harm if made public without our permission and without following proper protocols.

Our Business Partners are responsible for following all contractual requirements to protect Allergan business information, for handling all business information with care and protecting it from unauthorized use and disclosure.

Privacy and Data Protection

Individuals trust Allergan to collect, process, transfer, protect and store their personal data (i.e., information that can be used to identify, locate, or contact an individual, plus any other data as defined by applicable privacy/data protection laws) securely, compliantly, consistently with the notices provided to them and with their consent, as required.

Our Business Partners are legally and contractually required to process personal data only in accordance with Allergan's instructions.

Business Partners responsible for processing (i.e., collecting, storing, using, transferring or disclosing) Allergan-owned personal data will be required to sign Allergan's Privacy and Data Protection Addendum, or similar provisions, and agree to comply with all applicable privacy and data protection laws.

Business Partners must immediately report all Allergan-related privacy incidents to Allergan's Global Privacy Office at IR-Privacy@allergan.com.

Inside Information

While working as a Business Partner with Allergan, you may encounter material nonpublic ("inside") information about our company, or about companies with which we do business, or may be in business discussions with.

Any decision to buy, sell or hold securities, whether Allergan securities or those of other companies (for example, stocks, bonds or options), while in possession of inside information about Allergan or such other company is against the law.

Business Partners are not permitted to trade on any inside information or pass it along to others who may trade on it before it is made publicly available to ordinary investors (for example, through a public filing, a press release or via our public website).



WE PROTECT OUR COMPANY (continued)

At Allergan, our relationships, assets and brand are what allow us to drive results. We lead with integrity so that we can effectively serve our stakeholders by protecting our company assets, information and records.

Financial Integrity

As a publicly traded company, Allergan has a duty to maintain all books and records that reflect our financial position and our business accurately, honestly, completely and in a timely manner.

The integrity of our books and business records is essential to our continued success, and our Business Partners are equally responsible for ensuring the integrity of Allergan business records.

In addition, Allergan is committed to the prevention of the criminal facilitation of tax evasion, and to ensuring full compliance with requirements for the prevention of tax evasion in the course and scope of all its business operations. We expect our Business Partners to demonstrate this same level of commitment.

Records Management

At Allergan, we're committed to managing our records responsibly and ensuring we retain the records needed to support our tax, legal, compliance and financial obligations.

We expect our Business Partners to hold to the same standard in maintaining accurate records when working on behalf of Allergan and complying with associated laws and their contractual agreements with Allergan.

Company Assets

At Allergan, our company assets (e.g., computer hardware and software, company property, financial resources, office supplies and information security) are important to our business and enable us to do our work efficiently and effectively.

Our Business Partners have a responsibility to safeguard any Allergan company assets provided to them, manage all Allergan resources with care and to use these resources responsibly and only for business purposes.





WE ARE RESPONSIBLE CITIZENS

Allergan is focused on helping people everywhere live better lives. We are active in our communities, purposeful in our engagement and dedicated to making a difference.

Environmental Health and Safety

We work to provide a safe and healthful workplace and reduce our impact on the environment.

Allergan is a signatory to the UN Global Compact and has established environmental, health and safety goals and standards at our locations worldwide to ensure that we comply with all federal, state and local rules and regulations and reduce the environmental impact of our operations.

Business Partners shall protect workers from exposure to chemical, biological and physical hazards, have programs in place to prevent and address emergency situations, shall operate in an environmentally responsible manner and have systems in place to ensure the appropriate management of waste, air emissions and wastewater discharges.

We expect our Business Partners to comply with all associated laws and regulations.

Human Rights

At Allergan, we work to be good corporate citizens wherever we operate. We support the principles contained in the Universal Declaration of Human Rights and are committed to respecting human rights at every level of our supply chain.

We adhere to the Modern Slavery Act 2015 and equivalent legislation in other jurisdictions. Business Partners shall not use forced, bonded, indentured labor or involuntary prison labor.

We are committed to the responsible sourcing of our products and comply with laws that require disclosure of their use.

We respect human rights by practicing due diligence and never knowingly do business with any company or individual that violates employment laws or participates in human rights abuses, including child labor, forced labor, human trafficking, physical punishment, and unlawful discrimination, and we expect the same of our Business Partners.





WE TAKE CARE OF EACH OTHER

At Allergan, we strive to do what is right for each other. It's our responsibility to create and maintain a positive, safe and productive workplace.

Equal Employment Opportunity

At Allergan, we are committed to providing equal employment opportunity to qualified individuals in all personnel practices, including recruitment, selection, promotion, training, tuition assistance, compensation, benefits, transfer, layoff, termination and social and recreational programs. Our policies and practices prohibit unlawful discrimination.

Our affirmative action programs, covering minorities, women, individuals with disabilities and protected veterans, have been adopted in compliance with applicable laws and regulations, and define specific affirmative action and equal employment opportunity responsibilities of our employees.

All employees are expected to demonstrate commitment to our affirmative action efforts to ensure that equal opportunity is available to all, to encourage diversity within Allergan, and to demonstrate sensitivity to and respect for others.

Allergan's equal employment opportunity officer ("EEO Officer") is the Vice President of Global Talent. Allergan is a federal contractor subject to Executive Order 11246, the Vietnam Era Veterans' Readjustment Assistance Act

of 1974, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and each of their implementing regulations.

Allergan is required to notify our vendors and suppliers of our equal employment and affirmative action policies. Allergan requests our Business Partners support our efforts to comply with these policies.

Anti-harassment and Anti-discrimination

At Allergan, we work to maintain a positive working environment that's free from harassment, discrimination, intimidation, bullying and retaliation. Harassment and discrimination based on race, color, age, sex or gender, sexual orientation, gender identity or expression, ethnicity/national origin, citizenship status, disability, religion, union membership, marital status, military service and veteran status, genetic information or any other status protected by applicable laws, is prohibited.

Harassing and discriminatory behaviors come in many forms and include verbal, physical, visual and behavioral actions. We do not tolerate harassing or discriminating behaviors toward anyone with whom we do

business and expect our Business Partners to maintain this same standard.

Business Partners shall respect the rights of their workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils.

Workers of Business Partners shall be able to communicate openly with management regarding working conditions without threat of discrimination, harassment, bullying or retaliation.

Workplace Violence

At Allergan, we are committed to providing a secure workplace. We never tolerate bullying, harassment, intimidation, activities involving surveillance or stalking, threats, acts of physical harm directed toward an individual or his/her family, friends, coworkers, property, or the intentional destruction of property, nor do we permit weapons on our premises.

We depend on our colleagues to watch for and report any threatening or intimidating behavior and to resolve any conflicts calmly. We expect our Business Partners to demonstrate the same level of commitment to ensuring a safe workplace.



RAISING CONCERNS

Allergan provides a company hotline and other resources to allow for the reporting of issues.

Raising Concerns

At Allergan, we expect our Business Partners to report concerns regarding potential illegal or improper conduct that relates to our business.

If you see or suspect that anyone acting on behalf of Allergan is engaging in activities or behavior that may violate the law, this Business Partner Code of Conduct or Allergan's policies, report it promptly to Allergan via the Integrity Action Line.

The Allergan Integrity Action Line is operated independently by a third party and is available 24/7, from any location around the world. It allows individuals to report concerns anonymously, where permitted by law, and it can be accessed by visiting AllerganIntegrityActionLine.ethicspoint.com. Integrity Action Line telephone numbers for each country are also provided through this website.

Allergan prohibits retaliation against individuals for making good faith complaints and expects Business Partners to maintain this same standard.

