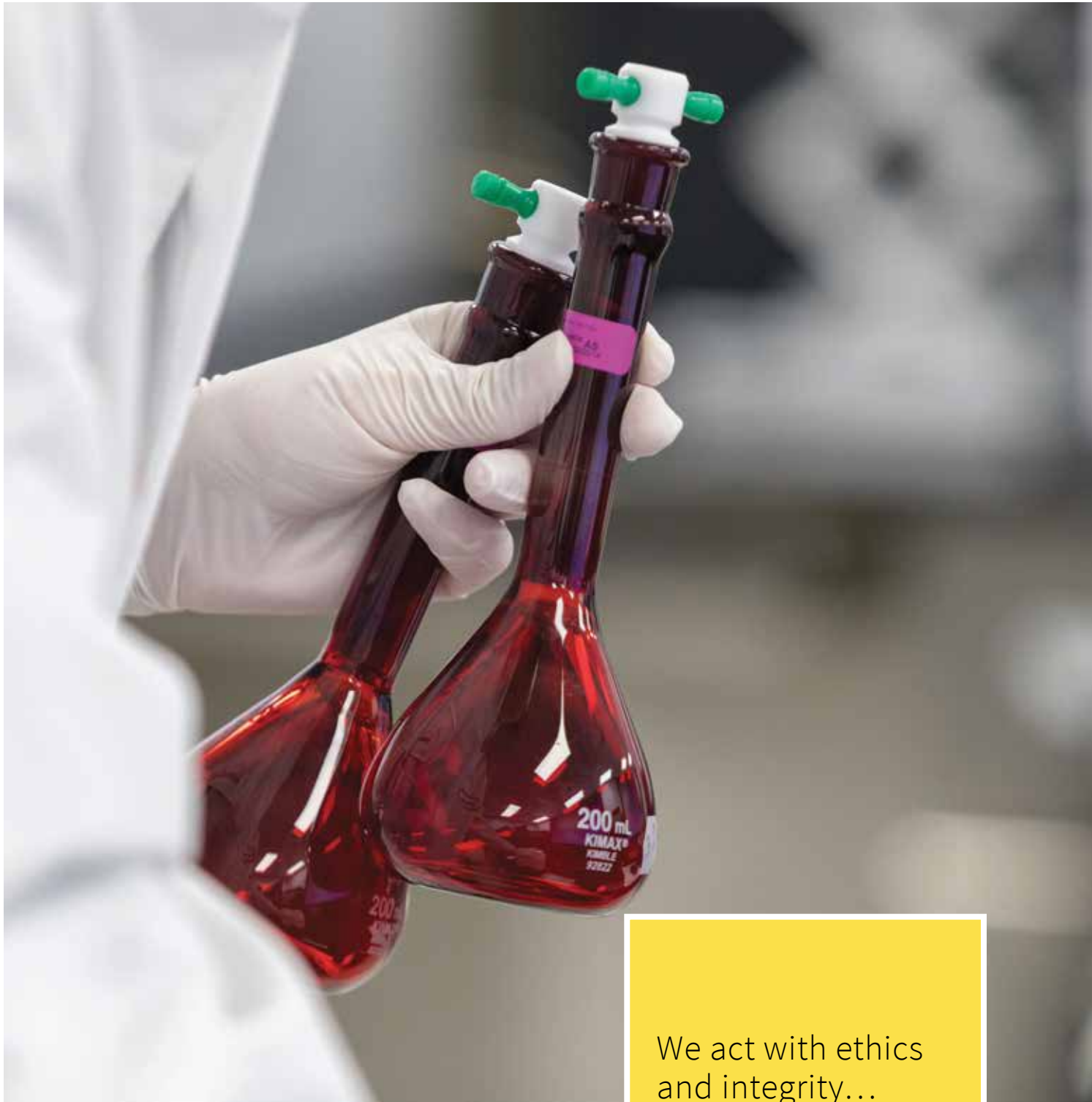


# Amneal Code of Business Conduct



We act with ethics  
and integrity...  
every day



# Amneal Global Ethics & Compliance Hotline

Compliance with our Code of Business Conduct, “the Code”, is a responsibility shared by all Amneal colleagues. If you witness behavior you believe violates the Code and are unable to resolve the issue, call the Amneal Ethics & Compliance Hotline immediately.

The Amneal Ethics & Compliance Hotline is available 24 hours a day, seven days a week in most languages.

In the United States call:  
**+1-877-412-8817**

Germany:  
**0-800-225-5288**  
at the English prompt dial  
**877-412-8817**

India:  
**000-117**  
at the English prompt dial  
**877-412-8817**

Ireland (UIFN):  
**00-800-222-55288**  
at the prompt dial  
**877-412-8817**

Ireland:  
**1-800-550-000**  
at the prompt dial  
**877-412-8817**

Switzerland:  
**0-800-89001**  
at the prompt dial  
**877-412-8817**

UK:  
**0808-234-6970**  
at the prompt dial  
**877-412-8817**

Or visit:  
**amneal.ethicspoint.com**

The Amneal Ethics & Compliance Hotline is completely confidential. You’ll speak to an independent operator who is not an Amneal employee. Your identity will not be divulged to Amneal without your permission, and Amneal has a strict policy to protect colleagues who report violations from any form of retaliation.

## A Message from Chirag and Chintu Patel

### Our Company

We make healthy possible  
High Standards  
Real Progress  
Genuine Partnerships

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# A Message from Chirag and Chintu Patel



## Conducting our business with Ethics and Integrity

We make healthy possible. It's a simple statement driven by powerful actions. Every day, our actions have the potential to impact the lives of countless people.

First and foremost – our patients rely on us to deliver quality medicines they can trust to help improve their lives or the lives of their families. Our customers expect us to be good partners, reliably delivering our products in a responsible manner by which we can both share in growth and success. Our stockholders invest in our strategies and ability to execute by providing us with some of the key resources needed to make Amneal a better, stronger, and more capable company.

Our reputation is one of our Company's most important assets. It's also one of the most difficult assets to fix if we get it wrong. Across all roles and functions, each of us plays a role in influencing our reputation.

Every day, our actions, decisions, and interactions with key stakeholders determine our reputation. Every day, we have a chance to get it right, to act with honesty and integrity, to act in compliance with laws and regulations, and to act in accordance with the spirit of Amneal's original founding principles that for close to 20 years have helped to make healthy possible.

Our Code of Conduct defines our commitment to ethics and compliance. Every member of our team must be familiar with and live up to these principles every day. We know we can count on you and thank you in advance for your steadfast commitment to ensuring Amneal's reputation continues to remain one of the best in our industry.



Regards,

Chirag Patel  
Co-CEO

Chintu Patel  
Co-CEO



# Our Company



## We make healthy possible

Today's health care environment needs solutions – solutions that enhance access to medicines, that make prescriptions more affordable and that are nimble enough to meet the ever-changing needs of tomorrow.

Our Amneal team is smarter, stronger, and more determined than ever. We are creative thinkers focused on introducing new ideas. We are well-positioned to be THE COMPANY that patients, customers, partners and stockholders trust to deliver solutions. Every day, we harness our collective talents to drive impact against our simply stated, yet powerful purpose: We make healthy possible.

We achieve success by acting in accordance with our Code of Conduct and by living the following principles:

## High Standards

We set a high bar for our products, pipeline, operations and service—always going the extra mile to exceed expectations and reliably execute in everything we do... because patients' lives depend on it.

## Real Progress

We relentlessly challenge the status quo—pushing ahead to pioneer quicker, smarter, and more affordable ways to improve real lives... because there can always be a better way.

## Genuine Partnerships

We are committed to working respectfully, collaboratively, and dynamically with our teammates, customers, partners, and communities... because together we can do more to improve health.

We challenge  
convention so  
healthy can be  
possible

# Introduction



Our Code is  
our compass

## Who is covered by the Code?

Our Code of Conduct applies to everybody at Amneal – directors, officers and employees, as well as contingent workers and business partners who perform work on our behalf (collectively referred to as “colleagues”). The Code applies to all colleagues in all subsidiaries, divisions, and affiliates of Amneal. There are no exceptions. As used in this Code, “Amneal” or “the Company” refers to Amneal Pharmaceuticals, Inc. and its subsidiaries and affiliates.

## Who develops the Code?

Developing and maintaining the Code is the responsibility of the Amneal Corporate Compliance Department. Corporate Compliance is responsible for making sure the Code is up-to-date at all times.

The Code is a “living document.” It evolves as laws and rules change, however, our commitment to maintaining the highest ethical standards remains constant. Any changes are communicated as quickly as possible to those who are affected, and an up-to-date version is maintained on Amneal’s internal intranet site.

## Who approves the Code?

The Code is approved by the Amneal Board of Directors, which also must approve any changes to the Code.

Any waivers of this Code for directors and executive officers of Amneal may be made only by the Board of Directors or the Audit Committee of the Board after disclosure of all material facts by the individual seeking the waiver, and will be promptly disclosed as required by law or stock exchange regulation. Any waivers for other individuals may be granted only by our Chief Compliance Officer or General Counsel, or their designees.

## Who is responsible for complying with the Code?

All Amneal colleagues are expected to comply with both the content and the intent of our Code. This means you must understand and comply with all of our policies, as well as laws and regulations that apply to your job, even if you feel pressured to do otherwise. The Code also requires you to seek guidance if you have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment or other service to, or partnership with the Company. Periodically, you may be asked to provide a written certification that you have reviewed and understand Amneal’s Code of Conduct, comply with its standards, and are not personally aware of any violations of the Code by others. This certification is your pledge to live up to our Code and its expectations and to promptly raise concerns about any situation that you think may violate our Code. Colleagues who violate our Code put themselves, fellow colleagues, and Amneal at risk and may be subject to disciplinary action up to and including termination of such colleague’s employment or other role with the Company.

## How is the Code enforced?

While Corporate Compliance is responsible for enforcing the Code and investigating violations, the Code of Conduct is self-policing, and all colleagues are responsible for resolving or reporting potential infractions. These procedures are detailed on page 11.





# The Amneal Corporate Compliance Program



Amneal’s Corporate Compliance Program is led by our Chief Compliance Officer.

The Corporate Compliance Department is responsible for developing and implementing the Amneal Corporate Compliance Program, including the Code of Conduct and related policies and for enforcing its provisions through investigations and recommendations to management.

- Primary duties of the Corporate Compliance Department include:
- Maintaining the Company’s Corporate Compliance Program.
  - Maintaining the Code of Conduct.
  - Defining compliance standards through policies and procedures.
  - Providing ongoing compliance guidance to colleagues through training and compliance communications programs.
  - Identifying and addressing areas of potential compliance vulnerability through auditing and monitoring.
  - Conducting investigations into possible Code, policy, and other compliance violations and making recommendations to management for follow-up action, and
  - Reporting regularly to management and the Compliance Committee of the Board of Directors on compliance issues.

Oversight of Amneal’s compliance activities is provided at both the executive and Board level. The Chief Compliance Officer meets periodically with senior executives to approve new policies, as well as major policy changes, and to review and discuss audit findings, investigations, and compliance initiatives.

The Audit Committee of the Board is responsible for assisting the Board of Directors in meeting their oversight responsibilities as they relate to the compliance-related activities of the organization.

Compliance is  
a team-wide  
commitment

# Following Laws and Regulations



We act with ethics and integrity... every day

It is Amneal policy to follow all laws and regulations in the countries and communities where we conduct business.

We are proud to work in an industry dedicated to helping people improve the quality of their lives. Because of the direct link between our products and human health, the pharmaceutical industry is highly regulated, and many of our activities are tightly monitored and controlled.

At Amneal, we follow both the letter and the spirit of the laws that affect us. We follow laws not only because we are required to do so, but also because following society’s rules is a fundamental responsibility of good corporate citizenship.

We want to be known as a company that maintains the highest integrity in everything we do – earning through our actions the trust of our employees, customers, business partners, shareholders, governments, and our neighbors in the communities where we do business.

Because we are a growing company with a global presence, Amneal has adopted “global” policies which reflect a consensus among many countries – without regard to which government or agency originated the standard.

It is important to understand that the Code provides only an overview of these laws and regulations. In some countries, more stringent laws, regulations, or industry codes may be applicable, and as such, local Amneal organizations and divisions may also establish more restrictive practices consistent with the applicable local laws. You are responsible for understanding and following all applicable laws, rules, regulations, and Amneal policies in the performance of your duties for the Company.

If you have questions about specific details, contact your supervisor or manager, your department head, your Human Resources representative, a Corporate Compliance representative, or an attorney in the Legal Department.





# Working Together



We treat one another with dignity and respect

We believe the skills, creativity and commitment of our colleagues are the source of Amneal’s scientific leadership and competitive strength. We value the contributions of every individual and treat one another with dignity and respect, regardless of position or role in the organization.

Amneal complies with national and local employment laws in the countries where we do business. The following policies apply to all Amneal locations.

### Business Language

English is Amneal’s designated business language and, therefore, it is expected that all business communications including, but not limited to, meetings and conference calls will be conducted in English, and that English will be used when communicating with customers, co-workers, and other business affiliates in the regular course of business including all task and work directives and all safety, facility, and security-related materials.

### Open Door Policy

Everybody is part of the same team at Amneal. We strive to maintain a personal and friendly atmosphere. In order for us to communicate and work together, we strongly believe in an open door policy.

You are encouraged to see your immediate supervisor about all questions or matters relating to your job. If your supervisor does not resolve your question or, if you feel more comfortable speaking to someone else, you may bring any issue to the attention of any member of management – including your Human Resources, Corporate Compliance, and/or Legal department representatives.

### Equal Employment Opportunity

Amneal is committed to providing equal employment opportunity for all applicants and employees when hiring, promoting, and terminating employees, as well as other conditions of employment.

Our policies mandate compliance with local employment laws and prohibit all forms of discrimination based on race, color, religion, sex/gender (including gender identity, gender expression, breast feeding, pregnancy, childbirth and related medical conditions), marital status, registered domestic partner status, national origin, ancestry, age, sexual orientation, veteran status, marital status, disability, genetic information, or any other basis protected by country, state, or local regulations.

We comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in the applicable country. We provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success.

For more information, contact a representative from our Human Resources, Corporate Compliance or Legal departments.

If you witness discrimination, it should be reported as a violation of our Code. Discriminatory behavior is contrary to Amneal’s core values and may result in disciplinary action, up to and including termination of employment.

### Workplace Security

Amneal is committed to preventing workplace violence and to maintaining a safe work environment.



Hostile Action

We believe all Amneal colleagues must feel physically secure in the workplace and in the course of their service to the Company. No colleague may engage in any hostile physical contact, intimidation, threat or violence.

Harassment

Every colleague has a right to a work or service environment free from harassment, regardless of whether the harasser is a co-worker, supervisor, manager, customer, vendor or visitor. Harassment, including bullying, is strictly prohibited and may result in disciplinary action, up to and including termination of employment or service or other relationship with the Company. This includes unwelcome conduct, whether verbal, physical, or visual that is based on legally protected classification – including but not limited to race, color, national origin, religion or creed, sex, age, disability, pregnancy, breastfeeding, ancestry, citizenship status, sexual orientation, gender identity and expression, marital status, military/veteran status, or genetic profile or any other characteristic or status protected by local, state, or federal laws, rules, regulations in the locations where we operate.

As is the case with any violation of the Code, you have a responsibility to report any harassing behavior or condition regardless of whether you are directly involved or a witness. Such behavior must be reported to a Human Resources, Corporate Compliance, and/or Legal Department representative.

Amneal prohibits retaliation against any colleague who, in good faith, reports, rejects, protests, or complains about unlawful discrimination, harassment, or retaliation.

Discrimination

Having a diverse team of colleagues who bring a wide variety of skills, abilities, experiences and perspectives is essential to our success. We embrace diversity of ethnicity, gender, generation, geography and thought. We are committed to the principles of equal employment opportunity, inclusion and respect. All employment-related decisions must be based on company needs, job requirements and individual qualifications. We do not tolerate discrimination against anyone, colleagues, customers, business partners or other stakeholders, on the basis of race, color, national origin, religion or creed, sex, age, disability, pregnancy, breastfeeding, ancestry, citizenship status, sexual orientation, gender identity and expression, marital status, military/veteran status, or genetic profile or any other characteristic protected by local, state, or federal laws, rules, or regulations or any other status protected by the laws or regulations in the locations where we operate. Report suspected discrimination right away and never retaliate against anyone who raises a good faith belief that unlawful discrimination has occurred.

Personal Relationships

We believe colleagues should feel confident that their business dealings with fellow colleagues are free of the potential for bias created by close personal relationships. Although we do not prohibit romantic relationships between colleagues, all colleagues must avoid romantic or sexual relationships with other colleagues that create conflicts of interest or the appearance of a conflict, discord or distractions, or which may have the potential to lead to allegations of sexual harassment. In particular, managers and supervisors must take steps to avoid romantic relationships with colleagues who they supervise.



Conflicts of Interest



We make objective decisions





We believe all decisions must be based on the consideration of facts, and free of any conflict of interest which might compromise objectivity. Every colleague has a primary responsibility to advance Amneal’s business objective, avoiding situations where their actions or personal interests create even the appearance of a conflict with Amneal’s interests.

A conflict of interest can arise when a colleague takes actions or has personal interests that make it difficult to perform his or her Company duties objectively and effectively. A conflict of interest may also arise when a colleague, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position with the Company. An “immediate family member” includes a person’s child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law, or any person (other than a tenant or employee) sharing the person’s household.

The Company’s Audit Committee must review and approve all related party transactions as required under the Company’s Related Party Transactions Policy and Procedures, including transactions between the Company and its officers or directors or affiliates of officers or directors, other than such related person transactions or situations for which the Company’s Conflicts Committee has been given sole authority and responsibility, as set out in the charter of the Company’s Conflict Committee.

Following are some common situations where conflicts of interest may arise.

Gifts

Gifts and entertainment can create goodwill in our business relationships, but can also make it difficult to be objective about the person providing them. Our choice of suppliers, vendors, and partners must be based on objective factors like quality, cost, value, service, and ability to deliver. We must avoid even the appearance of making business decisions based on gifts received through these relationships.

All gifts, including entertainment, must comply with normally accepted business practices and Amneal policies. Any gifts that compromise, or appear to compromise, Amneal’s ability to make objective business decisions are

inappropriate and not permitted. This policy applies to anything received as a result of a business relationship for which the recipient does not pay fair market value.

This standard of conduct is not intended to prohibit normal business practices so long as they are nominal and reasonable in value. However, even gifts of nominal value may be improper if given or received frequently.

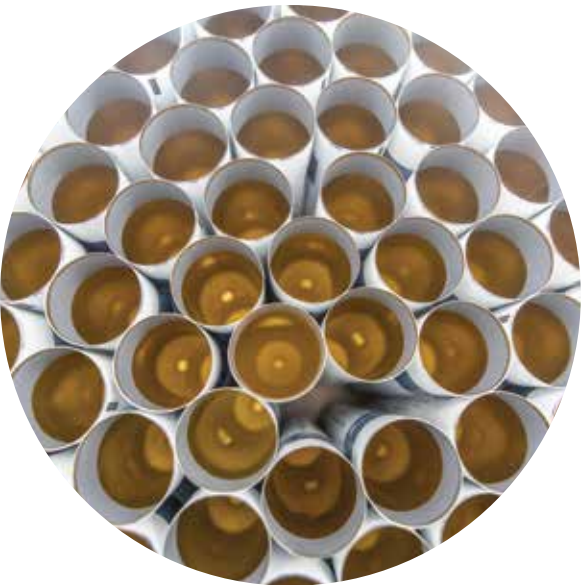
Giving Gifts

Gifts and entertainment provided to customers, suppliers, and other third party business partners, like all business expenses, must have a legitimate business need, be reasonable and appropriate in time and place, and be modest in value and frequency.

Amneal has also set specific gift and entertainment policies governing employees’ interactions with licensed healthcare professionals. Please see the Corporate Compliance Policy on Educational Items, Meals, Travel and Prohibition on Gifts and Entertainment to Healthcare Professionals.

In addition, the countries in which Amneal operates have specific rules governing gifts and entertainment provided to government officials. Employees may not provide gifts or entertainment to government officials without advance approval by Corporate Compliance.

Please ensure that if you give a gift to a customer that you are in compliance with the customer’s gift and entertainment policy.





Accepting Gifts

Amneal policy does not permit any colleague to accept loans, cash, gift certificates, or similar payments in any amount from any third party with which Amneal conducts business. Soliciting gifts, compensation or other benefits from a third party, regardless of the amount, is prohibited.

Outside Employment

Our work for Amneal must always come first.

As an Amneal director, officer, or employee, you may not serve as an owner of, employee, or advisor to another business or institution if doing so would interfere with your ability to perform your responsibilities to Amneal, or create a conflict of interest.

Second jobs or positions that do not interfere with your responsibilities to Amneal are permitted, but must always be kept separate from your employment or role at Amneal, and Amneal resources may never be used for these activities.

Any business relationship that may create the appearance of a conflict of interest must be disclosed to your supervisor and receive advance written approval from our Chief Compliance Officer or his/her designee.

Business Relationships

Decisions about suppliers or business partners must be objective and free of personal considerations.

No colleague or member of his or her immediate family may have a “material interest” in a company that has significant dealings with Amneal (for example as a competitor, supplier or customer) without written approval from our Chief Compliance Officer or General Counsel or his or her designee.

Financial interests of less than U.S. \$5,000 or, regardless of value, interests that amount to less than 1% of the outstanding securities of a publicly traded company, are not considered a “material interest” for purposes for this section.

Relationships with Friends and Family Members

If a friend or a member of your immediate family holds a position or assets which may create a conflict of interest with Amneal’s best interests, the relationship must be disclosed to your supervisor, our Chief Compliance Officer, and/or General Counsel. Officers and Directors must disclose such relationships to Amneal’s General Counsel.



Business, Scientific, and Professional Organizations

Amneal supports colleagues’ participation in business, scientific, and professional organizations, so long as it does not conflict with the Company’s interests. Care must be taken to ensure that advice provided or services performed for outside organizations do not utilize proprietary information or compromise Amneal’s interests in any way.

If you speak at an industry event or submit a paper for publication, the presentation or paper must be reviewed and approved by your supervisor. Your supervisor is responsible for obtaining approvals from others (Legal, Corporate Communications, Scientific Exchange Review Committees, etc.) in the organization as necessary, in compliance with the Company’s Publications Policy.

Business Opportunities

Employees and directors owe a duty to Amneal to advance the Company’s business objectives when the opportunity to do so arises. Except as otherwise expressly provided pursuant to Amneal’s Certificate of Incorporation, employees and directors may never:

- Take for themselves, directly or indirectly, any business opportunity that would interest or likely interest the Company, or that is discovered through the use of corporate property, information, or position, unless Amneal has already been offered the opportunity and turned it down.
- Use Amneal assets (including property, equipment, funds, facilities, know-how, or personnel) or their position with the Company for personal gain.
- Compete with Amneal, including in acquiring or selling any asset or property (whether tangible or intangible), or otherwise interfere in the Company’s business affairs for direct or indirect personal gain or benefit.



# Environment, Health And Safety



We operate  
in a safe and  
environmentally  
responsible manner

As a responsible member of the communities where we do business, Amneal is committed to operating our facilities in a safe and environmentally responsible manner.

It is the responsibility of Amneal colleagues to follow all environmental and safety rules, regulations, and policies.

### Understanding National and Local Requirements

All colleagues are required to be familiar with national and local environmental laws and regulations which relate to their employment responsibilities, and comply with them at all times. This includes making sure reports to government officials on environmental matters are complete, accurate, and timely.

### Disposal of Hazardous Materials

Every colleague is responsible for ensuring that all waste products, hazardous materials, and other regulated items are stored, handled, and disposed of in compliance with applicable laws and regulations.

### Reporting Hazardous Conditions and Events

Colleagues must immediately report any unsafe storage or improper disposal or release of a hazardous or toxic substance to their supervisor or department head, and to the EHS Manager responsible for the facility.

### Use of Protective Equipment and Apparel

All colleagues are required to read, understand, and follow all environment, health, and safety policies and procedures that affect their work, and must always wear personal protective equipment and apparel as specified.

### Reporting Potential Health Risks

Colleagues are responsible for informing management of health conditions that may affect their ability to perform required duties. Colleagues working with hazardous materials or in high hazard areas and/or environments are encouraged to inform management about health conditions that may be impacted by such work (for example, pregnancy) in accordance with local rules and regulations, so the Company can take appropriate action to protect employees.



# Company Assets and Records



We leverage our assets to propel our business

## Use of Corporate Funds and Assets

Amneal colleagues are responsible for protecting the Company's assets and ensuring their efficient use. Colleagues are strictly prohibited from using any Company assets or property for any unlawful or improper purpose. Company assets and property shall not be used other than in support of legitimate business purposes.

The books and records of Amneal must be accurate and complete to properly document the transactions of the Company. Accordingly:

- No false or misleading entries shall be made in Amneal's books and records for any reason, and no colleague shall engage in any activity that results in such prohibited act, even if directed to do so by a supervisor.
- No undisclosed or unrecorded fund or asset of the Company shall be established for any purpose.
- No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents or entries supporting the payment.

Any colleague having information or knowledge of any unrecorded fund or asset or any prohibited act shall promptly report such matter to Amneal's Chief Financial Officer, General Counsel, or call the Compliance Hotline. All managers are responsible for the enforcement of this policy and must ensure that all colleagues who report to them are aware of and comply with this policy.

## Use of Amneal Technology Assets

Depending on your job, you may be provided with a computer, email and Internet access, tablet, or other devices. These tools are provided for business use. Personal use must comply with applicable Company policy.

Amneal limits personal use of Company resources if it interferes with your productivity or the overall availability of network and computing resources. If you are unsure whether your internet usage is appropriate, you should discuss it with your supervisor.

Use of these resources, whether in the office or at home, is not private. Amneal monitors individual use of network services, including email and visits to specific websites as permitted by law.

Colleagues are prohibited from using Amneal technology assets in any way that may be disruptive, offensive, or harmful to others, including, but not limited to the surfing of websites, cartoons, gossip, profanity, vulgarity, material with a sexual content, or any other material that would violate Amneal policies or be construed as offensive, harassing, or disrespectful to other colleagues (e.g., racial or ethnic slurs, sexual comments or images). Amneal assets and resources, including its computing, telephone, facsimile, and networking resources, should never be used to access or disseminate:

- Sexually explicit content.
- Slanderous or libelous content.
- Threatening or harassing messages or chain letters.
- Any information in violation of any laws or Amneal policies.
- Other content that could reasonably be construed as inappropriate.

Amneal policies prohibiting unlawful discrimination and harassment include e-mail correspondence or other electronic transmissions, such as text messages.

Further, colleagues should use good judgment and adhere to applicable privacy laws and Amneal confidentiality policies when using social media or other on-line activities, such as internet chat rooms, social networking sites, bulletin boards, etc.

Colleagues who violate this policy will be subject to disciplinary action. Questions about whether a particular use is permissible should be addressed to your supervisor.







### Record Keeping Policies

Amneal's policy is to maintain accurate hardcopy and electronic Company records and accounts in accordance with applicable laws, relevant accounting standards, and Company policies to ensure legal and ethical business practices and to prevent fraudulent activities.

All written and electronic information relating to Amneal business is the exclusive property of Amneal and may not be removed from Amneal premises, except as necessary to carry out assigned duties for the Company.

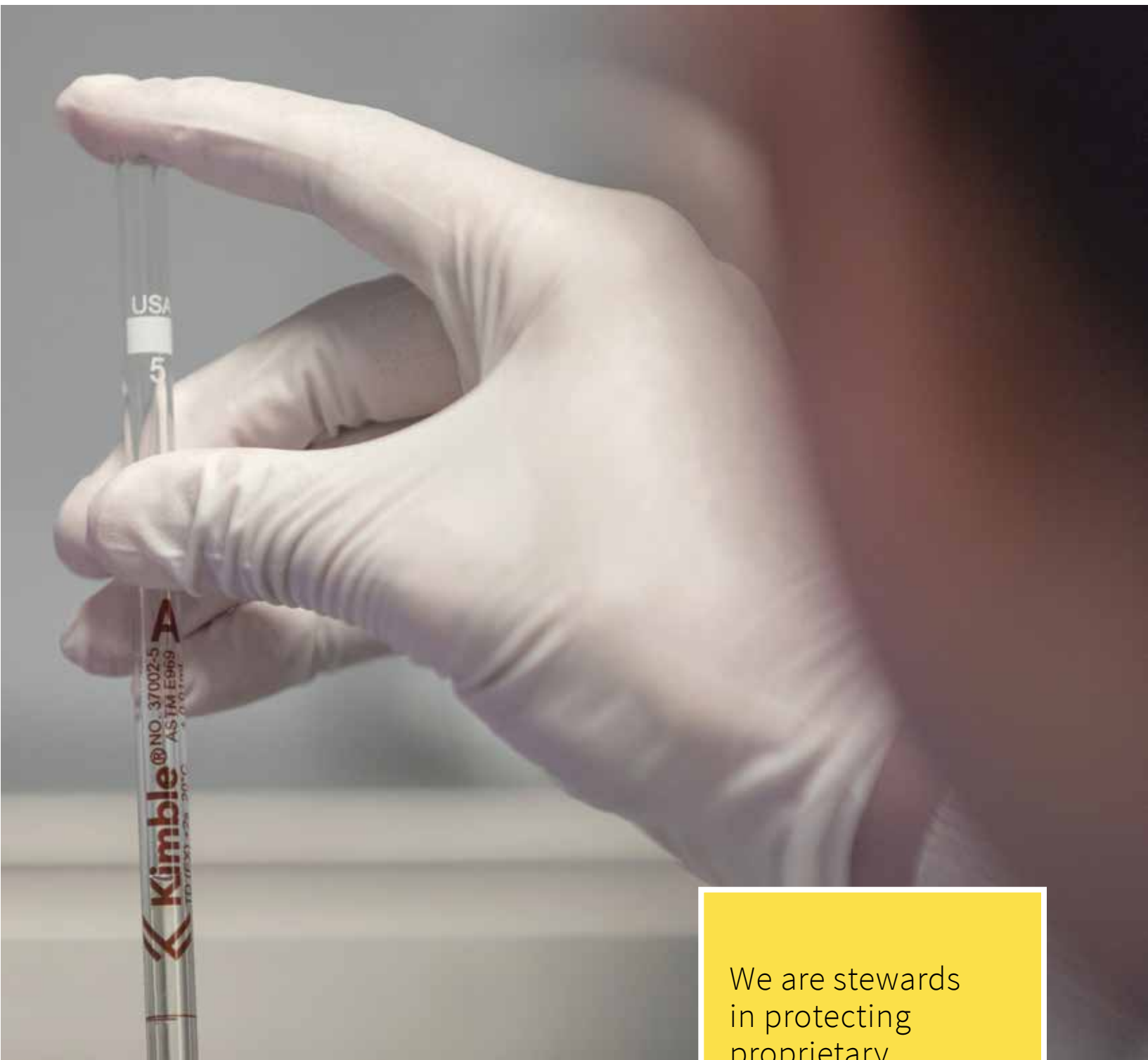
All Company records and accounts must be complete and not misleading.

All records must be stored in a safe and secure location for the period of time required by law or Company policy. Old or unneeded records must be disposed of securely and only in accordance with Amneal document retention schedules and legal requirements.

Never destroy or alter any document in anticipation of, or in response to, a request for those documents by any government agency or court. Never destroy or alter any document if you have been notified or reasonably suspect litigation against Amneal is anticipated, and the documentation in question is related to such litigation or anticipated litigation.

Amneal colleagues are required to cooperate with internal and outside auditors, legal counsel, and any regulatory agencies examining Company books and records.

## Confidentiality and Privacy



We are stewards  
in protecting  
proprietary  
information and  
privacy data



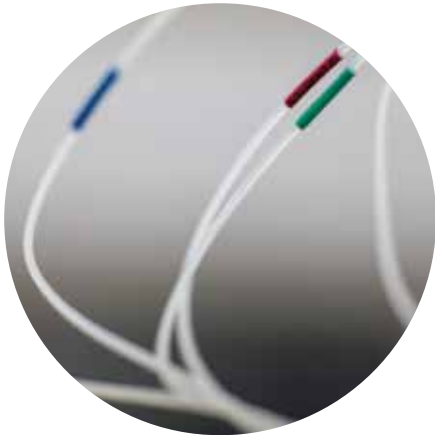
Protecting and respecting the confidentiality of proprietary information and the privacy of colleagues, patients, and customers is an important responsibility shared by every Amneal colleague.

Confidential Information

A fundamental responsibility of every Amneal colleague is to maintain the confidentiality of the Company’s non-public information. This includes the non-public information of outside parties (for example, customers, suppliers, business partners, etc.) that may be received in confidence during the course of conducting Amneal’s business.

Strong access controls must be enforced to ensure access to confidential information is only provided for authorized business use. Examples of confidential information include:

- Scientific data
  - Clinical trial information
  - Financial data
  - Business strategy and plans
  - Contracts
  - Commercial relationships
- Customer information
  - Inventions
  - Patent applications
  - Proposed trademarks
  - Proprietary documents



The above list is not exhaustive and includes any confidential and/or proprietary information, intellectual property and knowledge or data about Amneal or any third party that is received during the course of conducting the Company’s business. The misuse or unauthorized disclosure of confidential information not otherwise publicly available may result in disciplinary action, up to and including termination of employment.

Confidentiality Agreements

All employees are required to sign a written agreement to maintain the confidentiality of Amneal’s propriety information and the information of its business partners. This commitment to maintaining confidentiality remains in force at all times during and after employment with Amneal, whether termination is voluntary or involuntary.

Privacy and Data Protection

Amneal is committed to protecting the reasonable privacy expectations of those with whom we do business, including customers, consumers, and employees. We believe individuals have the right to decide when their personal data is collected, used, or disclosed. We also believe responsible stewardship of personal data is a critical component in maintaining trust in the Amneal brand and ensuring that individuals feel confident that Amneal respects their right to privacy.

Many countries, as well as states in the U.S., have implemented, or are planning to implement, privacy and/or data protection laws that set requirements for the appropriate handling of personal data. Amneal will comply with all applicable laws.

“Personal data” includes any information that can be used to identify, contact, or locate an individual.

At Amneal, the term “Personally Identifiable Information” refers to two categories of personal data: “General Personally Identifiable Information” and “Sensitive Personally Identifiable Information.”

“General Personally Identifiable Information” includes first and last name, birth date, gender, e-mail address, mailing address, profession, education, or professional affiliations used to identify you.

“Sensitive Personally Identifiable Information” refers to personal information including, but not limited to, religion, race, health status, political opinion, sexual preferences, income, social security number, credit card numbers, order history, or prescribing habits.

Together, we refer to “General Personally Identifiable Information” and “Sensitive Personally Identifiable Information” as simply “Personally Identifiable Information.”

Amneal will collect and use only as much Personally Identifiable Information as is:

- Required by law or
- Necessary to fulfill the purpose for which the Information is collected.

All personal data in Amneal’s possession should be protected, following these principles:

- Personal data is collected, processed, stored and transferred with adequate precautions to ensure confidentiality, and is accessible only to individuals with legitimate reasons to know or have access to it.
- Employees and other individuals will be asked for their consent to the collection, processing, transfer and storage of their personal data as required by applicable laws.
- Employees will have the opportunity to review their own personal data held by Amneal and to correct any errors found in accordance with the applicable law.

Always consult your supervisor, your Human Resources representative, or the Corporate Compliance Department if you have any questions about Amneal privacy policies, or if you become aware of any privacy breaches..

Protecting Electronic Communications and Data

The Internet, Intranet, email, and voicemail are not secure forms of communication, so special care must be exercised when using these systems to avoid inappropriate disclosures. Confidential information must not be stored in unauthorized Internet- or cloud-based information and storage systems.



# Investor Relations and Corporate Communications



We deliver accurate and timely information

We believe we have a special responsibility to our shareholders and the media to provide accurate, understandable, and timely information about our business so investors and potential investors can make informed business decisions.

Amneal stock trades on the New York Stock Exchange (NYSE) and, as such, we are subject to United States securities laws and regulatory authorities.

### Public Disclosure and Company Records

It is our policy that information provided in public communications, including our filings with the United States Securities and Exchange Commission and other regulatory authorities in the countries where we do business, be full, fair, accurate, timely, and understandable.

All colleagues, including those involved in the financial disclosure process or who otherwise have access to sensitive and/or confidential Company information, including the Chief Executive Officer and Chief Financial Officer, are responsible for assuring compliance with this policy.

All such colleagues are required to be familiar with the disclosure requirements that apply to Amneal in accordance with local laws and regulations. You are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about Amneal to others, whether within or outside Amneal, including Amneal's independent auditors.

Company records are the basis for Amneal's public disclosures. All records must be complete and accurate. It is a serious violation of the Code of Conduct to knowingly misrepresent or falsify information in Company records.

### Prohibition of Insider Trading

The Amneal Insider Trading Compliance Policy, and regulations of many of the countries in which the Company does business, prohibit any officer, employee or director from buying or selling stock or securities while in possession of material, non-public information relating to such security, whether the issuer of such security is Amneal or any other company (including, but not limited to, a customer, partner, or supplier of the Company). Officers, directors, and employees are also prohibited from passing or "tipping" any such material, non-public information along to third parties that trade on such information. Violations of these policies may lead to civil and criminal penalties for both Amneal and the individual.

There are no exceptions to these rules, even for transactions that may be justifiable or necessary for independent reasons (e.g., the need to raise money for an emergency expenditure).

Information is considered "material non-public information" when the information is not available to the general public and there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security or if the fact is likely to have a significant effect on the market price of the security. Material information can be positive or negative and can relate to virtually any aspect of a company's business or to any type of security, debt, or equity.

Although this is not a complete list, information about the following matters may be considered to be "material non-public information" until publicly disseminated:

- |  |  |
|--|--|
| • Financial results or forecasts   | • New product introductions, technological discoveries or regulatory approvals           |
| • Earnings or earnings forecasts   | • Clinical trial results   |
| • Dividends  | • Developments regarding strategic collaborators or the status of regulatory submissions |
| • Significant borrowing or financing developments including pending public sales or offerings of debt or equity securities | • Significant litigation or regulatory actions   |
| • Defaults on borrowings   | • Important business developments such as major contract awards or cancellations         |
| • Bankruptcies   | • Government inquiries or investigations   |
| • Unusual gains or losses in operations  | • Management or control changes  |
| • Possible mergers, acquisitions, tender offers, or dispositions   |  |
| • Significant capital expenditures or borrowings   |  |
| • Major new products or product developments   |  |





Material information does not have to be related to a company's business. For example, the contents of a forthcoming newspaper column that is expected to affect the market price of a security can be material.

In addition to the general policy against insider trading, Amneal has adopted other policies restricting trading in Amneal stock in certain instances or at certain times. Specifically:

No officer, director or employee identified as an employee (each a "Restricted Employee") on the list (the "Restricted Employee List") of employees with routine access to non-public material information subject to trading window restrictions (as amended from time to time) shall purchase or sell any security of the Company during the period beginning on the 14th calendar day before the end of any fiscal quarter of the Company and ending upon completion of the second full trading day after the public release of earnings data for such fiscal quarter or during any other trading suspension period declared by the Company.

Any Amneal employee who violates the prohibition against insider trading or the other restrictions on trading Amneal stock may be subject to dismissal from Amneal, and may also be subject to civil and/or criminal prosecution by the United States Securities and Exchange Commission and other national, state and/or federal authorities in accordance with applicable local laws and regulations.

**Insider Trading by Family Members**

Trading by members of a colleague's household can be the responsibility of that colleague under certain circumstances and could give rise to legal and Amneal-imposed sanctions.

Please consult the Amneal Insider Trading Compliance Policy for additional details. If you have any questions about whether you possess inside information and are covered by these policies, please consult with the Amneal Legal Department before making any trades in Amneal stock.

**News Media and Investor Inquiries**

Events may occur within Amneal or the pharmaceutical industry that will draw immediate attention from the news media. It is imperative that only specifically-designated individuals at Amneal speak for the Company to deliver an appropriate message and to avoid giving misinformation in any media inquiry, especially in the event of a crisis. To best serve these objectives, Amneal will respond to the news media in a timely and professional manner only through such specifically-designated spokespersons.

All Amneal employees, other than specifically-designated spokespersons, are expected to adhere to the following media policy, and answer all media/reporter questions as follows:

"I am not authorized to comment for Amneal. Let me have our Corporate Communications office contact you."

In addition, only certain officers of Amneal are authorized to discuss Amneal business with brokers, analysts, and stockholders. Any requests for information from brokers, analysts, stockbrokers or the news media should be directed to Amneal's Vice President, Investor Relations and Corporate Communications.

Please refer to the Amneal Regulation FD Policy for further details regarding communications to investors and the public.



# Pharmaceutical Compliance



We prioritize our commitment to compliance and quality

## Pharmaceutical Laws

Pharmaceutical laws affect virtually every aspect of Amneal’s operations—from regulatory approvals to product labeling, promotion and advertising. The purpose of these laws is to make sure our products are safe, effective, and promoted fairly and accurately. Regulated activities include:

- Research and development
- Clinical trials
- Regulatory approvals
- Safety and efficacy
- Adverse event reporting
- Labeling
- Manufacturing
- Storage
- Distribution
- Product Quality
- Record keeping
- Marketing
- Advertising and Promotion
- Sales
- Reimbursement
- Product Sampling

Global regulation of the pharmaceutical industry is greatly influenced by government agencies such as the United States Food and Drug Administration and the European Union’s European Medicines Agency. While efforts are underway to harmonize regulations into consistent global standards, laws today may vary significantly depending on the specific country and market.

Amneal requires all employees to comply at all times with applicable laws and regulations governing the pharmaceutical industry in those markets where the Company conducts its business and to comply with Amneal’s own policies and procedures.

Failure to follow applicable laws can lead to severe penalties and sanctions against responsible colleagues and the Company, including large fines, product seizures, import restrictions, criminal prosecutions, product recalls, refusal to approve pending product applications, and the exclusion of individuals and the Company from participation in government programs.

Violators may also be personally liable for prosecution, fines, and potentially even imprisonment. Violations of law or of Amneal policies may also lead to severe disciplinary action, up to and including termination of employment. Remember: It is your responsibility to understand the laws and regulations that apply to your work at the location where you are employed.

Amneal requires employees to report suspected violations of applicable laws and regulations, and any suspected violations of Amneal policies and procedures, directly to a supervisor, Corporate Compliance, or Legal, or indirectly through the Amneal Ethics & Compliance Hotline. Failure to report suspected noncompliance may lead to disciplinary action, up to and including termination of employment.

## Quality

Amneal is committed to continuous quality improvement resulting in the development, production, and delivery of high-quality products for our customers and patients. We will comply with all applicable laws and regulations regarding our research, development, manufacturing and distribution activities, including Good Clinical Practices (GCP), Good Manufacturing Practices (GMP), and Good Laboratory Practices (GLP) (collectively, “Good Operating Practices” or “GxP”), among other practices.

We take quality-related complaints seriously, and will ensure that any complaints are properly investigated and reported, as required, to the appropriate regulatory authorities. If you have a quality-related concern you should immediately inform a supervisor, the Quality Department, a Corporate Compliance or Legal representative, or report your concern through the Amneal Ethics & Compliance Hotline.







## Safety

We have a responsibility to report adverse events associated with our products. If you learn of an adverse event whether during work time or outside office hours you must, within 24 hours of receipt, report this information to the Corporate Drug Safety department at one of the following:

**Phone: 877.835.5472 Option 1**  
**E-mail: [DrugSafety@amneal.com](mailto:DrugSafety@amneal.com)**

## Product Advertising & Promotion

Amneal complies with all laws and regulations governing the sales and marketing of our products. The global pharmaceutical industry is highly regulated because our products have a direct impact on patient health. Our activities are covered by a broad array of laws and regulations — many of which are extremely complex, tend to overlap, and are subject to interpretation.

In addition, governments are often the primary payors for drugs prescribed for their citizens. Governments, therefore, have a direct financial interest in ensuring fair, objective, and accurate representations and transactions—and can severely penalize violators.

Amneal will only solicit and obtain business only through sales and marketing programs that have been formally approved by the Company. No employee is permitted to give unauthorized discounts, rebates, concessions, commissions or incentives, or bribes or other payments, to obtain or retain business.

The Company follows carefully the pharmaceutical laws in the markets we serve—adhering at all times to product labeling requirements and promoting only uses that have been approved by regulatory authorities. Therefore all claims must:

- Be consistent with product labeling.
- Be supported by substantial evidence.
- Be truthful and not misleading.
- Appropriately balance the benefits of the product with its risks.

Amneal only advertises and promotes its products through programs and materials that have been formally approved by the Company. All advertising and promotional programs and materials must be reviewed by Amneal personnel to ensure compliance with applicable country, state, and local laws and regulations.

Unauthorized alteration of product labels or literature may result in severe penalties against the responsible individual and the Company. No Amneal employee may modify any portion of any product labeling or literature without prior authorization from the Promotional Asset Review Committee (PARC). Use of any unapproved promotional materials or advertisements is strictly prohibited.

## Healthcare Fraud and Abuse Laws

Amneal is committed to conducting the sales and marketing of its products in compliance with applicable laws wherever we do business.

The cost of many Amneal products is reimbursed under government healthcare programs in which the government is the primary payor. Laws designed to prevent fraud and abuse under these programs prohibit pharmaceutical companies from offering valuable items or services to customers or potential customers to induce them to buy, prescribe, or recommend the Company's products. These are called “anti-kickback” laws. Exceptions are provided for discounts and certain other arrangements if specified requirements are met.

Other laws prohibit the submission of false information to government reimbursement programs, or doing anything to cause, assist, or encourage customers to submit false claims for payment to these programs.

Some laws, including the United States False Claims Act, also contain provisions encouraging individuals with knowledge of false claims to report the misconduct to the government. Also known as “relators” or “whistleblowers,” these individuals are protected from retaliation under these laws.

Always consult representatives from the Legal and Corporate Compliance Departments if you have questions about the applicability of these laws and regulations to an ongoing or planned business activity.

# Global business compliance



We are focused on integrity, trust and service

## Fairness and Integrity in the Marketplace

Amneal is committed to conducting its business affairs in a fair, ethical, and legal manner, and expects all employees to do the same. We must always deal fairly with Amneal customers, suppliers, service providers, competitors, and employees.

Colleagues must never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

It is Amneal policy to respect the trade secrets and proprietary information of others. Although information obtained from the public domain is a legitimate source of competitive information, a trade secret obtained through improper means is not.

If a competitor's trade secrets or proprietary information is offered to an employee in a suspicious manner, or if an employee has any question about the legitimacy of the use or acquisition of competitive information, contact the Legal Department immediately.

Sales of Amneal products and services, and purchases of products and services of suppliers, shall be made solely on the basis of quality, price and service, and never on the basis of giving or receiving payments, gifts, entertainment, or favors.

## Antitrust, Unfair Competition and Restraint of Trade

Amneal is committed to free and open competition in the marketplace, and requires colleagues to strictly adhere to the antitrust laws in the countries where we do business.

Antitrust laws are often complex, difficult to interpret, and apply to a wide range of business activities. The following examples provide a general guide to antitrust compliance:

- No colleague may discuss with, or provide information to, any competitor about pricing or related matters, whether the information concerns Amneal or its suppliers, distributors, wholesalers, or customers.
- No colleague may agree with a customer on resale price; imply that such resale price is a condition of sale, contract renewal, or advertising allowance; or discuss with or imply to a customer that the Company will attempt to influence the pricing of another customer or competitor.
- No colleague shall engage in group boycotts, or allocate or divide customers, territories or production with a competitor.
- No colleague may publish advertising or promotional claims that are not fair, balanced, and accurate or not supported by appropriate studies or data.
- No colleague may engage in predatory pricing or discriminate in prices or terms of sale, for like goods, between competing customers to the injury or damage of the disfavored customers, or induce a seller to so discriminate in favor of the Company, as purchaser.



Examples of conduct that violate this Amneal policy include:

- Agreements or understandings with competitors on price.
- Agreements or understandings with competitors to “divide up” customers, products, services, or territories.
- “Bid-rigging” (for example, reaching a prior agreement with competitors to govern conduct in the bidding process) or making agreements or reaching understandings with competitors not to bid in public or private procurements.
- Agreements or understandings with competitors to disadvantage other competitors.
- Parties entering into these types of agreements can be prosecuted under criminal law, resulting in significant fines for corporations and fines and imprisonment for the colleagues involved.

An unlawful agreement on “price” can cover a broad range of agreements among competitors that directly or indirectly affect the price of goods or services. This includes, for example, agreements on price ranges, minimum prices, list prices, advertised prices, pricing formulas, discounts, rebates, profit margins, credit and warranty terms, or other terms of sale.

An “agreement” or “understanding” need not be in writing for it to be unlawful. It can be oral or inferred from the conduct of the parties, as in the following examples:

- An informal observation to a competitor about a company’s likely future prices;
- Comments to a competitor about the desirability of an entire industry following a price increase; or
- Comments to a competitor about the desirability of ceasing discounts to certain customers.

These kinds of situations have each been used (along with other circumstantial evidence) to charge companies and individuals with criminal price-fixing. It is for this reason that you should avoid any conduct or activity, formal or informal, from which even an appearance of improper conduct could be drawn.

The obligation to scrupulously avoid even an appearance of impropriety applies in business settings, as well as to communications with competitors in casual social settings (golf games, civic events, etc.). In addition, a supplier in one market may be a competitor in another.

Conversations that are wholly appropriate in the context of a supplier relationship may be inappropriate when discussions shift to issues relating to areas of competition.

Contact a Legal Department representative if you have questions about the applicability or implication of antitrust laws in relation to Amneal’s business activities.

### Copyright Laws

Amneal respects copyrighted works and copyright laws in the various countries where we do business. No Amneal colleague may reproduce, adapt, distribute, perform, or display any copyrighted work in any form (for example, print, audio, video, or electronic) without the permission of the copyright owner. Violations can result in severe penalties for both the individual and Amneal.

Contact a Legal Department representative if you have any questions about your ability to use a copyrighted work.

### Export Controls and Trade Sanctions

Export controls are laws that prohibit, control or limit transfers of both products and information among countries.

Amneal complies with all United States federal import and export laws and regulations. These laws restrict transfers, exports, and sales of products or technical data from the United States to certain prescribed countries and persons as well as re-export of certain items from one non-U.S. location to another.

In addition, certain countries and parties are subject to trade and economic sanctions by the governments of countries in which Amneal operates, which in many cases prohibit even ordinary sales, research, manufacturing, and other commercial relationships.

Different export clearance and recordkeeping requirements may apply to exports from each jurisdiction in which Amneal operates. If you are involved in importing and exporting goods and data, you are responsible for knowing and following these laws.

### Anti-Corruption

Amneal policy prohibits any offer, payment, promise of payment, or authorization of the payment of any money, gifts, loans or other inducement, whether given directly or indirectly, to a government official or the employee of a private company in order to influence any act or decision of the official or employee to obtain or retain business or gain any regulatory or other commercial advantage.

Amneal policy also prohibits the receipt of anything of value by an Amneal employee from suppliers, vendors or others who may seek thereby to influence any act or decision of the employee.





Gifts, Meals and Entertainment

Gifts to customers or prospective customers of cash, gift certificates, stock, or similar items in any amount are prohibited.

A gift item is never permitted if it is (a) prohibited by law or regulation or the known policies of the employer of the intended recipient or (b) intended to improperly influence, or would have the appearance of improperly influencing, the recipient.

In sales situations, the provision of gifts, meals, and entertainment may be prohibited or heavily restricted by law. Where permissible, the provision of gifts, meals, and entertainment may not be conditioned expressly or implicitly on any agreement by a health care practitioner to purchase or prescribe, or to recommend the purchasing or prescribing of, Amneal products; or used to reward a practitioner for purchasing or prescribing Amneal products.

Likewise, gifts, meals, and entertainment provided to practitioners who are government employees or employees of state-owned enterprises must comply with Amneal policies regarding interactions with government employees.

Failure to follow this policy may subject an employee to severe disciplinary action up to and including termination of employment.





# Working with government



We respect the laws that govern our interactions with government officials

## Payments to Government Officials

We have a responsibility to obey all laws governing our contacts with government officials in any country where we may do business. Amneal colleagues must be familiar with and follow the laws that govern payments to government employees, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010.

A government official is an individual, whether elected or appointed, who holds a legislative, administrative, or judicial position of any kind. This includes any person who performs public functions in any branch of the national, local, or municipal government, or who exercises a public function for any public agency or public enterprise (e.g., public health agencies and officers exercising public functions in state-owned enterprises). A government official can also be a political party, an official, employee, or agent of a political party, a candidate or prospective candidate for political office, an international governmental organization, a state-owned enterprise, or an entity owned or controlled by a government unit. Healthcare Professionals employed by public hospitals are also considered government officials.

Amneal colleagues and representatives are prohibited from directly or indirectly making, promising, authorizing, or offering anything of value to a government official on behalf of Amneal.

## Gifts to Government Officials

United States federal law and Amneal policy specifically prohibits making any offer, promise, or gift of any value to an employee, agent or official of the federal government, subject to specific limitations. This includes any Congressperson, Senator, a member of a Congressperson's or Senator's staff, or any other Congressional or Senate employee.

Many governments around the world have very strict rules regulating the provision of gifts, entertainment, meals, favors, or anything of value to government employees and union officials. Amneal will comply with all such applicable rules as required.

If you work with public officials, be aware that even simple offers such as purchasing a meal or refreshments may be unacceptable or even against the law. Always contact the Corporate Compliance or Legal departments before providing any gift or entertainment to a public official.

## Making False Reports to Government Agencies

Amneal requires that all information provided to any government agency be true and complete to our best knowledge in all material respects at the time it is provided. Hiding or concealing any material fact that would make a statement or report misleading by its omission is also likely to be illegal and is against Amneal policy.

## Political Contributions

Amneal encourages colleagues to be involved personally in their communities and in political affairs. However, no colleague shall directly or indirectly use or contribute funds or assets of Amneal to any political party, candidate or campaign, unless it is an accepted practice and lawful. Any contribution must be approved in advance by the Chief Financial Officer, General Counsel, and Chief Compliance Officer.

Colleagues are not prohibited from making voluntary personal contributions to any candidate, political party or cause. However, these contributions are not reimbursable by Amneal, either directly or indirectly.

Colleagues may not solicit contributions from other colleagues during business hours and may not use Company assets or resources, including the Amneal name or logo, in connection with personal political activities.

Charitable Contributions

Amneal is proud of its commitment to enhancing the quality of life in our communities and around the world. As part of this focus, we dedicate resources to social, healthcare, and environmental responsibility programs in the communities where the Company operates, and not-for-profit organizations aligned with our mission and core business.

As part of this program, corporate contributions of financial, human and other resources are sometimes granted by Amneal in compliance with the Company's principles and local laws and regulations. All contributions of Company funds or assets to any not-for-profit or community organization must be coordinated with the Corporate Communications department.

Amneal policy prohibits giving charitable donations directly to an individual in a position to prescribe or recommend an Amneal product or a charitable organization on behalf of, or in the name of, a specific individual in a position to prescribe or recommend an Amneal product to ensure that the individual is not conferred a personal benefit that might unduly influence their medical judgment. Charitable donations must never be tied in any way to the past, present, or future purchase, prescribing, recommendation, or formulary placement of any Amneal product, or as a reward for past behavior, or to induce the future prescription or purchase of Amneal products. Any benefit that Amneal obtains must be minimal and incidental to the main purpose of the charitable donation.

Occasionally, as part of its support of not-for-profit organizations, Amneal encourages, but does not require, employees to participate in on-site fundraising activities.





# Reporting possible violations



We all play a role  
in ethics and  
compliance

Our Code of Conduct represents a set of ethical values to be shared by all Amneal colleagues.

We are committed to operating according to the high standards of business conduct set forth in the Code, and rely on every colleague to report potential violations.

The Amneal Corporate Compliance Department is responsible for administering the Code, for investigating potential violations, and for making recommendations to management for corrective action.

### How to Report Violations

If you witness a potential violation of the Code, in addition to any official reporting requirement required by law, you should report it to your supervisor, to your Human Resources representative, to a Corporate Compliance or Legal Department representative, or to the toll-free Amneal Ethics & Compliance Hotline.

The Ethics & Compliance Hotline is available to respond to calls and inquiries 24 hours a day, seven days a week, in most languages. All information provided via the Ethics & Compliance Hotline is confidential and anonymous where permitted.

### Accessing the Amneal Ethics & Compliance Hotline

The Amneal Ethics & Compliance Hotline is available 24 hours a day, seven days a week in most languages.

In the United States call: +1-877-412-8817

Or visit: [www.amneal.ethicspoint.com](http://www.amneal.ethicspoint.com)

The Amneal Ethics & Compliance Hotline is completely confidential. You'll speak to an independent operator who is not an Amneal employee. Your identity will not be divulged to Amneal without your permission.

### Non-Retaliation Policy

It is Amneal policy to ensure that no colleague will suffer any form of retaliation for coming forward to report potential violations of laws, rules, regulations, or ethical standards regardless of whether that reporting was to an immediate supervisor, Human Resources, other management, or the Ethics & Compliance Hotline.



Retaliation towards colleagues for good faith reporting of violations will not be tolerated, and acts of retaliation are subject to disciplinary action up to and including termination of employment or service or other relationship with the Company. However, reporting will not immunize a colleague from the consequences of his or her personal misconduct, and knowingly false accusations will not be tolerated.

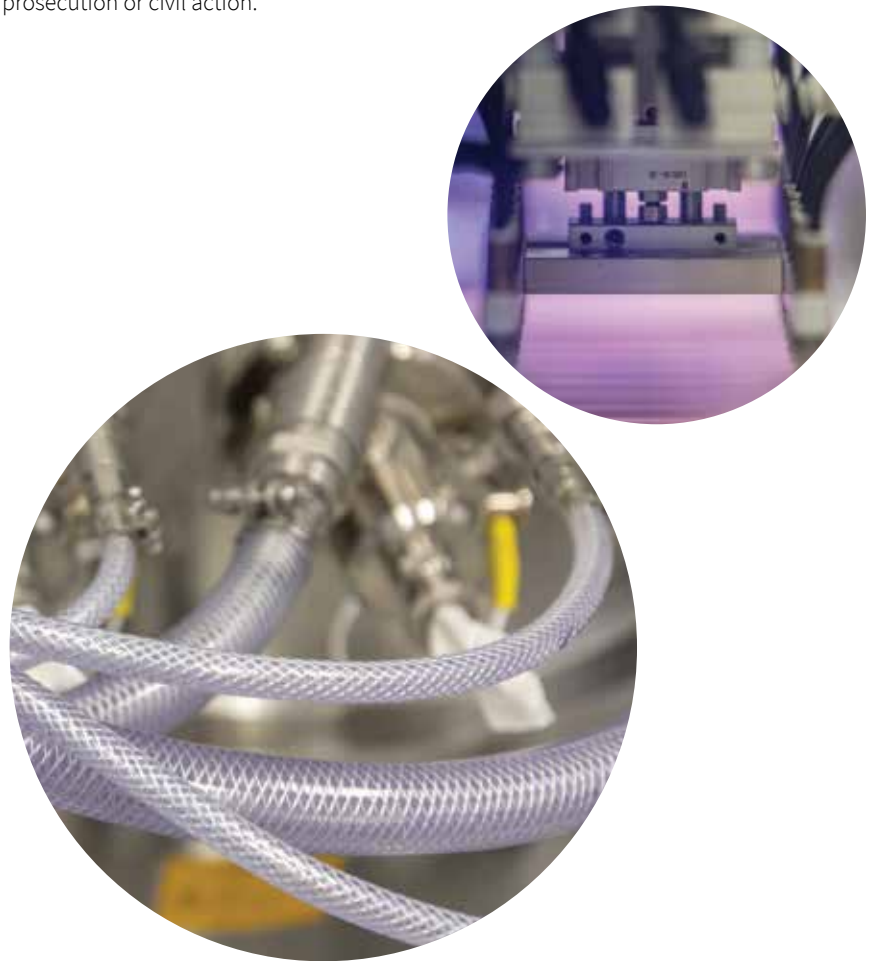
Investigation of Complaints

Every inquiry or report a colleague makes will be taken seriously and investigated by the Corporate Compliance Department. Inquiries and investigations will be conducted with appropriate concern for the reputations of the individuals involved. Colleagues are expected to abide by Amneal policies and to cooperate fully in any investigation that the Company may undertake.

Please note that Amneal has an obligation to protect the confidentiality of all parties involved in an investigation, and therefore may be unable, in some instances, to advise the reporting colleague of the status of the investigation.

Disciplinary Action

If a colleague violates his or her obligations under the Code, the colleague will be subject to disciplinary measures. To the extent permitted by local law, such measures may include but are not limited to reprimand, loss of compensation, loss of promotional opportunity, demotion, or termination of employment or service or other relationship with the Company. Violations may also be referred to the proper authorities for criminal prosecution or civil action.





# Acknowledgement requirements



All Amneal colleagues are required to read and sign the statement below and return it to the Corporate Compliance Department. Alternatively, colleagues may acknowledge the Code via electronic signature if that option is provided at your location.

I have read and understand the Code of Conduct, and acknowledge responsibility for complying with the provisions of the Code. I understand that breach of the Code and/or related policies may result in disciplinary action, up to and including termination of my employment or service or other relationship with the Company. I further understand and agree that nothing in this Acknowledgment Form changes the nature of my employment or other role with Amneal.

Signature  
\_\_\_\_\_

Printed Name  
\_\_\_\_\_

Title  
\_\_\_\_\_

Date  
\_\_\_\_\_

Acknowledging  
our Code



# Nine Simple Questions



Most ethical questions are not complicated or highly technical, and can be answered based on your own knowledge of the situation and a little common sense. If you are faced with a situation where you're unsure of the best way to respond, ask yourself these simple questions.

1. Do I have all the facts?
2. If I need more information, how or where might I find it?
3. Who is affected by this situation?
4. What are the possible legal, ethical and other consequences of this situation?
5. Are my actions consistent with the Amneal Code of Conduct?
6. If I do nothing about the situation does that constitute a decision in itself?
7. Who might help me find a solution to the problem?
8. Would I feel comfortable if my actions were reported in a newspaper?
9. How would I explain my actions to others, such as my children or other family members, or in a court of law?

If you ask these questions and still can't figure out what to do, ask your supervisor or manager, your department head, your Human Resources representative, or a Corporate Compliance representative. Keep asking until you receive an acceptable answer.

Remember — no manager, supervisor or other Company official has the authority to tell you to disobey a policy or law.



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