



# Code of Ethics

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# Purpose & Values Statements

**COMPASSION** for Patients and **EXCELLENCE** in Science  
Inspire Our Pursuit of New Medicines.



## Written Welcome

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### Dear Colleagues,

As researchers, manufacturers and marketers of pharmaceutical products, we operate in an extremely complex and highly regulated industry. It is our shared responsibility to know these requirements, as well as the policies that govern our work, including this Code of Ethics ("Code"). Keeping these tenets front and center will help us to ethically fulfill our shared **Purpose** – compassion for patients and excellence in science inspire our pursuit of new medicines.

Our Code, which applies to Purdue Pharma L.P.<sup>1</sup> and all of its subsidiaries, exemplifies our commitment to conducting our business in accordance with the highest ethical values and all applicable laws, regulations and our Voluntary Injunction (a copy of which can be found on the Policy Portal of the Purdue intranet). We carry with us lessons from our past. We are mindful of the trust we have been afforded in distributing opioids, as well as the critical need for our actions related to all products to be patient-focused. And, we strive for all of our actions to be above reproach. We look to foster a culture of ethics and compliance that supports all colleagues.

While we attempt to explain laws and regulations in our policies and procedures and through our educational training programs, these tools are not intended and cannot be expected to address every legal requirement or situation.

If you have any questions, we encourage you to go to your manager. If you do not feel comfortable going to your manager, or if you still have questions after doing so, we ask that you approach another manager, a member of the Ethics & Compliance, Human Resources, Law, or Corporate Security Departments. The Company will treat your inquiry in a confidential manner to the extent consistent with adequate investigation and appropriate corrective action. We also offer our Integrity Helpline, which provides you with the ability to call any time to ask any question in a completely anonymous manner if you choose.

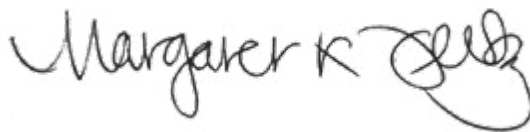
» **Call us:** 1-877-787-3831

» **Visit our Portal:** <https://pharma.caseiq.app/portal>

Regardless of the mechanism you use to report a concern, you do not need to fear retaliation. You may not be retaliated against for asking questions or raising good faith concerns regarding possible improper conduct. This creates a positive compliance environment that promotes patient safety, contributes to employee satisfaction, and is a business advantage for all of us. Thank you for supporting ethics and integrity at Purdue. Together we will maintain the trust that patients and consumers have placed in us.



**Craig Landau, M.D.**  
President & Chief Executive Officer



**Margaret K. Feltz**  
Vice President, Chief Compliance Officer

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<sup>1</sup>When we refer to the "Company," we are referring to Purdue Pharma L.P. and its subsidiaries, Adlon Therapeutics L.P., Imbrium Therapeutics L.P., Greenfield Bioventures L.P. and Rhodes Pharmaceuticals L.P.

# TOP 10 BEHAVIORS BASED ON OUR VALUES

## LEAD BY EXAMPLE

Always do the right thing and encourage others to do so.

## CHALLENGE SHORTCUTS

Push back on choosing the easier vs. right path. Follow commitments, regulations, and guidelines.

## OPEN AND TRANSPARENT COMMUNICATION

Open discussion on ideas through listening rather than dictating and prejudging.

## ENTREPRENEURIAL MINDSET

Seek and apply innovative ideas. Take calculated risks to advance the business. Do not fear failures and learn from mistakes.

## TEAM OVER SELF

Share knowledge/skills with others and not blame others for team failures.

## EMBRACE CHANGE

Challenge the status quo. Adopt better way of working. Adapt quickly to changing business priorities.

## BIG PICTURE APPROACH

Think longer term beyond immediate goals. Focus on total product value to patients, providers, and stakeholders.

## OWNERSHIP

Freedom to own important tasks, identify problems and also bring potential solutions.

## SPEAK UP

Challenge questionable requests and if others are not demonstrating integrity. Stand up for others.

## RESPECT

Treat others with Respect. Embrace diversity of backgrounds, opinions, experiences, and skills.

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This Code and our supporting policies and procedures cannot cover every situation that may arise. If you are ever faced with a difficult decision or issue and are unclear on how to respond, have courage and ask questions until you feel satisfied that you are on the right path.





# OUR VALUES

We strive to behave ethically, applying good judgment based on our Values.

We understand the importance of building and maintaining trust in our commitment to compliance.

In this Section:

Integrity at Purdue

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Purdue and its employees are committed to conducting our business in accordance with applicable laws, rules, and regulations, as well as our Voluntary Injunction, and we expect all Purdue colleagues to meet the highest standards of business ethics. Beyond mere compliance, we strive to behave ethically, applying good judgment based on our Values to ensure our conduct is exemplary.

## What does acting with integrity look like at Purdue?



### **Knowing and abiding by key principles**

Our Purpose and Values and applicable laws, regulations and policies.

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### **Asking tough questions**

Applying the relevant principles to the jobs we do and engaging one another in dialogues about what is right, especially as we innovate and try new things.

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### **Raising issues when you see them**

We are all accountable for ensuring that the standards of legal and ethical behavior are upheld. Have the courage to tell us if you have a concern that something might be wrong.

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### **Improving our integrity programs**

If you have a suggestion for improvement - of a policy, a practice, a training, or any other area - don't hesitate to share it.

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### **Doing the right thing**

You should never violate a law or policy, nor should you ever feel encouraged or pressured to do so.

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# OUR COMMITMENT

Our business depends on our ethical conduct, and it is critical that we carefully observe the spirit and letter of all applicable laws and regulations.

In this Section:

Our Shared Responsibility

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Our business depends on our ethical conduct, and it is critical that we carefully observe the spirit and letter of all applicable laws and regulations, as well as our Voluntary Injunction. To succeed, we must conduct ourselves with the highest standards of both corporate and personal integrity, consistent with our Values. We have been granted extraordinary trust, and our success depends upon our ability to earn and honor that trust. This is our commitment to our patients and customers, as well as our employees, contractors, and suppliers.

## Our Shared Responsibility

All Purdue employees are required to bring to the Company's attention information about suspected violations of law or policy, regardless of the identity or position of the person who is suspected of engaging in improper conduct.

While we hope that employees feel comfortable discussing concerns with their managers, employees may also reach out to:

Another Manager

A member of the Ethics & Compliance, Corporate Security, Human Resources, or Law Departments

The Integrity Helpline:  
**1-877-787-3831** or  
**<https://pharma.caseiq.app/portal>**

To the extent possible and when appropriate under the circumstances, efforts will be made not to disclose the identity of an individual who reports a known or suspected violation of law, regulation or policy. Similarly protected will be the identity of individuals who participate in any investigation. Retaliation against employees who report issues in good faith is strictly prohibited.

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**Q: I am a contractor and received a copy of the Code of Ethics when onboarded to this assignment. It seems to me that the Code applies to employees. Does the fact that I got a copy mean I am considered an employee?**

**A:** *No, the Code is not, and should not to be construed as, a contract of employment or any other type of contract or an assurance of continued employment.*

**Q&A**

# OUR ETHICS & COMPLIANCE PROGRAM

Purdue is committed to conducting its business in compliance with the many laws and regulations that govern our operations.

## In this Section:

[Our Ethics & Compliance Program](#)

[OIG 7 Elements](#)

[Confidentiality](#)

[Non-Retaliation Policy](#)

[Management Responsibility & Our Open Door Policy](#)

[Consequences of Code Violations](#)

[Consequences of Non-Compliance](#)

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Purdue is committed to conducting its business in compliance with the many laws and regulations that govern our operations. Our compliance program provides resources to assist every individual within the Company to act in a legal and ethical manner and to know how and where to obtain help or resources, when needed. This is because compliance is not just about rules, it is about working in a culture where each of us is accountable for acting with integrity. We likewise expect our vendors, contractors, subcontractors, agents and other business partners to adhere to the same high standards in their dealings with Purdue and with others on our behalf.

The Ethics & Compliance Department works with colleagues to ensure adherence to laws, regulations, and Company policies on a daily basis, but also to ensure that we are all acting in alignment with our Purpose and Values.

Among other things, the Ethics & Compliance Department has responsibility for compliance training, answering inquiries, investigating matters, compliance auditing and monitoring, and creating policies and procedures, as well as promoting compliance with state and federal transparency laws, and identifying and mitigating risks. The Ethics & Compliance Department publishes this Code and Purdue's Healthcare Law Compliance Policies, maintains the Ethics & Compliance Department intranet website, responds to reports made to the Integrity Helpline 1-877-787-3831, and is available as a resource on ethics and compliance matters. Purdue's Ethics & Compliance Program is based on the SEVEN KEY ELEMENTS outlined by the Office of Inspector General of the Department of Health and Human Services.



CLICK ON EACH TOPIC BELOW TO LEARN MORE ABOUT PURDUE'S PROGRAM.

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## Compliance Officer & Compliance Committee

Margaret Feltz serves as Purdue's Chief Ethics & Compliance Officer and is responsible for overseeing the compliance program for Purdue and its subsidiaries. In this capacity, Ms. Feltz reports directly to the General Counsel and makes regular reports to the Audit Committee of the Board of Directors. Ms. Feltz heads the Ethics & Compliance Department, which is responsible for administering all aspects of the Ethics & Compliance Program, including training programs and compliance monitoring systems, developing informational colleague resources, and investigating potential violations of laws, regulations and/or Company policies. The Enterprise Compliance & Risk Management Committee, which is made up of senior leaders from across the Company, provides oversight and support for Purdue's efforts to ensure that its business is conducted appropriately.



## Written Standards & Procedures

Some of the policies that provide Purdue colleagues with guidance around their conduct of day-to-day operations include Purdue's Code of Ethics and Purdue's Healthcare Law Compliance Policies documents.

Additionally, various departments have Policies and Standards that apply to individuals and provide guidance on expected conduct and activity. By establishing clear standards and rules, our policies help employees carry out their job responsibilities in compliance with applicable laws and regulations.

See the [Policy Portal](#) of the Purdue intranet for information that is broadly applicable to all employees. You should also speak with your manager to determine which policies apply to your work at Purdue and where those policies are located.

## Effective Lines of Communication

Purdue employees are required to bring to the Company's attention information about known or suspected violations of law or policy by any employee, contractor, or agent of the Company. Colleagues are required to come forward with any such information regardless of the identity or position of the person who is suspected of engaging in improper conduct.

While we hope that colleagues feel comfortable discussing any matter with their supervisors, there may be times when a supervisor cannot help or when additional questions exist even after these discussions. In these cases, you should speak with others, including reaching out to:

Another Manager

A member of the Ethics & Compliance, Corporate Security, Human Resources, or Law Departments

The Integrity Helpline:  
**1-877-787-3831** or  
<https://pharma.caseiq.app/portal>

**Integrity Helpline.** The Integrity Helpline provides a confidential way to report ethics or compliance concerns or suspected misconduct, or to request information or advice regarding the application of Company policies or laws. Calls to the Integrity Helpline are not traced or recorded, and callers may remain anonymous if they choose.

By Phone: Call **1-877-787-3831**

A caller will reach a 24-hour communication response center that is staffed by operators from an outside company that specializes in taking calls from individuals with ethics or compliance questions and concerns. When you call, an operator will listen to your concerns, ask questions, and review the information you provide. The operator will then forward a written description of your concerns to Purdue's Ethics & Compliance Department, which will then investigate or forward to the appropriate individuals to investigate and ensure that appropriate action is taken, if warranted.

By Portal: <https://pharma.caseiq.app/portal>

## Effective Training & Education

Purdue is committed to providing effective training to employees, managers, officers, and directors on the Ethics & Compliance Program. To that end, individuals will be required periodically to complete online ethics and compliance training courses available on Purdue's Online Workplace Learning (OWL) system. Additionally, individuals will have access to important online policies pertaining to compliance, including our Code of Ethics and Healthcare Law Compliance Policies. If you are interested in additional content offerings on a particular topic, please email your request to [compliance@pharma.com](mailto:compliance@pharma.com).

## Internal Monitoring & Auditing

Internal monitoring and auditing of business processes are important parts of an effective Ethics & Compliance Program and are designed to help detect and prevent potential violations of law or policy. The Ethics & Compliance Department drafts annual monitoring plans and conducts reviews of various different business processes. By performing compliance assessments on a regular basis, we can ensure the implemented measures are effectively mitigating the identified compliance risks.

## Enforcement & Discipline

At Purdue, various policy documents such as our Code of Ethics, Healthcare Law Compliance Policies and Employee Manual educate colleagues about our commitment to our ethics and compliance. These documents put all colleagues, including management, on notice that failure to adhere to our compliance standards may have disciplinary consequences, up to and including termination of employment. If an investigation suggests that discipline may be warranted, appropriate action is taken.

## Investigations & Disclosures

Our Ethics & Compliance Program supports prompt response and corrective action for significant, potential, suspected or actual violations of law or policy. It is expected that ethics and compliance concerns referred through any of the many communication channels available (e.g., personal contact, email, Integrity Helpline) will be carefully reviewed, thoroughly and thoughtfully investigated in a timely manner, and appropriately resolved.

Purdue's Ethics & Compliance organization conducts investigations objectively, protecting the confidentiality, dignity and fair treatment of those involved, while assuring the integrity of the investigation. Employees are required to cooperate fully in any investigation. Employees involved in compliance violations may be subject to disciplinary action up to and including termination of employment.

## Confidentiality

To the extent possible and when appropriate under the circumstances, efforts will be made not to disclose the identity of an individual who reports a suspected violation of law or policy. Similarly, the identity of those who participate in the investigation will be protected to the greatest extent possible. However, the need to conduct an adequate investigation and to take corrective action may require disclosure of certain information. In some circumstances, the Company also may be required by law to identify a person who makes a report or who is a witness.

## Non-Retaliation Policy

Retaliation in any form against an individual who reports a violation of this Code or of law, regulation, or policy, or retaliation against an individual who assists in the investigation of a reported violation is itself a serious violation of this Code. Concerns about retaliation should be reported immediately. Any employee who retaliates against any person in violation of Purdue's Non-Retaliation Policy will be disciplined appropriately.

**Q: I suspect that there may have been misconduct in my department in violation of Company policies. Should I come forward and report the issue, or should I wait until I have more information? How do I go about reporting a concern?**

**A:** *We all have a duty to act. If you have an honest, good faith concern about a potential violation of Company policies, you should report the concern right away. You should not attempt to conduct an investigation yourself. Even if you have made the error, it is better to self-report. If you think an employee has done something that violates our standards, you owe it to patients and your co-workers to report it. You are encouraged to raise the concern with any manager or supervisor, Ethics & Compliance, Corporate Security, Law or Human Resources. Or, if you are uncomfortable doing so, you may report the issue anonymously using the Integrity Helpline 1-877-787-3831.*

Q&A

## Management Responsibility & Our “Open-Door” Policy

All Purdue employees have a responsibility to create an environment that encourages open discussion on significant issues that impact the Company as well as issues that may involve misconduct. Managers need to encourage free discussions and questions about situations where employees feel there may be violations of Company policies or applicable laws.

# Consequences of Code Violations

Adherence to this Code is a condition of working for Purdue. Employees who violate this Code or any law, regulation, or policy, or who encourage others to do so, may be subject to appropriate consequences.

If, after investigation, it is determined that a compliance violation has occurred, an employee may be subject to discipline including, for example, training, referral to counseling, warning, reprimand, withholding of a promotion or pay increase, demotion, reassignment, temporary suspension without pay, or termination of employment.

Individuals are required to report a violation even if they have participated in the violation that is being reported. While self-reporting will not shield someone from potential consequences, positive consideration will be given to an individual who comes forward to report a compliance violation.

## Consequences of Non-Compliance

### Consequences of Non-Compliance for Purdue May Include:

- Prosecution
- Monetary fines
- Loss of business
- Damage to Purdue's good name, trade and customer relations, and business opportunities
- Other penalties

### Consequences of Non-Compliance for an Employee May Include:

- Discipline
- Prosecution
- Monetary fines
- Imprisonment
- Termination of employment
- Other disciplinary action, as determined by the Company
- Other penalties

# OUR INDUSTRY

Purdue's longstanding commitment is to healthcare professionals and patients.

In this Section:

Compliance with Laws

Interactions with Healthcare Professionals (HCPs)

Adherence to the PhRMA Code

Quality Control/Manufacturing

Clinical Research

Disclosure of Data

Fair & Balanced Marketing

Labeling

Scientific Exchange

Handling Controlled Substances

Corruption & Bribery

Antitrust & Competition Laws



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As a pharmaceutical researcher, manufacturer and marketer, Purdue's commitment is to healthcare professionals and patients. Our Purpose speaks to this commitment and our Values advocate behaving both lawfully and ethically in all that we do.

## Compliance with Laws

Purdue employees respect and observe the letter and spirit of federal, state and local laws.

Obeing the law is the foundation of our behavior and activities. Purdue expects all employees to comply with all applicable laws and regulations. These include, but are not limited to:

- False Claims Acts
- Anti-Kickback Statutes
- Prescription Drug Marketing Act
- Food and Drug Administration Modernization Act
- Federal Food, Drug and Cosmetic Act
- Health Insurance Portability and Accountability Act
- Federal healthcare program requirements

Violations of healthcare laws or regulations may result in severe penalties against the responsible employees and the Company, including jail sentences, large fines and exclusion of Purdue products from reimbursement under federal and state programs. Please find additional information on these laws in Purdue's Health Care Law Compliance Policies. Collectively and individually, we seek to:

- Ensure truthfulness in educating, marketing, selling, promoting, and advertising products
- Improve the safety, quality and manufacturing of healthcare products
- Protect patient safety, as well as privacy
- Follow all procedures regarding the reporting, investigation, and tracking of adverse drug events and product quality complaints
- Eliminate fraud and abuse in federal and state healthcare programs
- Prohibit the improper influence of financial incentives on medical judgment
- Avoid even the appearance of anti-competitive conduct by complying with domestic and foreign antitrust or "competition" laws
- Abide by procedures pertaining to the storage, handling, and shipping of products
- Adhere to the special rules and regulations regarding the handling, storage, and transfer of controlled substances, immediately reporting any knowledge or suspicion regarding the improper handling, transfer, loss, or diversion of controlled substances
- Produce timely and accurate reports consistent with federal and state transparency laws, including but not limited to the Sunshine Act provisions of the Patient Protection and Affordable Care Act

## Interactions with Healthcare Professionals (HCPs)

We respect the practice of medicine and we support the integrity of the physician/patient relationship. We interact with HCPs, payers, and others in a way that does not have, or appear to have, an improper influence on their decisions. In the event that our business requires that we engage the services of an HCP to serve as an investigator, consultant or speaker, we do so to meet a legitimate and appropriate business purpose and only when the terms of the engagement are consistent with applicable legal requirements. We adhere to applicable industry guidelines and other regulations, only offering meals and hospitality in a manner that is consistent with our policies and is conducive to educational, clinical, or scientific discussions. We collect, report, and disclose payments and other transfers of value made to HCPs where required by law. For more information, please refer to the Policy on Transfers of Value to Healthcare Professionals (HCPs) on the [Policy Portal](#) of the Intranet.

**Learn More About Public Disclosure of Payments to Healthcare Professionals and Hospitals:** Many states have enacted laws that require us to track and publicly disclose any payments (including meals, expenses, honoraria, etc.) that we make to healthcare professionals and/or research institutions.

One important law, the federal Anti-Kickback Statute, seeks to protect federal healthcare programs and patients from improper influence on prescribing decisions. It prohibits improper influence on healthcare decisions by making it a crime to make any payment (monetary or in-kind) to someone if a purpose of the payment is, directly or indirectly, intended to reward past prescribing or to cause someone to purchase, prescribe or recommend a product that is reimbursed by a federal or state healthcare program. The Anti-Kickback Law is based on the notion that an HCP's decision about a patient's treatment must not be influenced by motives of personal gain.

The following are some examples of activities that are prohibited by Anti-Kickback Laws:

- Engaging a healthcare professional to be a paid consultant for Purdue because the HCP is a high prescriber of one or more of our products and to maintain a good relationship with the HCP to encourage further prescribing
- Providing a research grant to an HCP who is a key decision maker on a major formulary in order to get one of our new products on formulary



HCPs: Any individual who has a direct role in patient diagnosis and/or treatment. HCPs include physicians, physician assistants, nurse practitioners, and pharmacists. HCPs also may include individuals who do not work directly with patients but have influence over the recommendation, purchase, or prescribing of products (e.g., Nurses, Office Staff). Under certain state laws the definition of an HCP may be broader; the Company will endeavor to take such jurisdictional requirements into account when appropriate.

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The Company is operating under a Voluntary Injunction that confirms the Company's pledge to restrict the promotion of opioids and demonstrates the Company's commitment to the responsible manufacture and commercialization of these medications. The terms of the Voluntary Injunction apply to all employees and various contractors engaged on our behalf. Questions regarding the Voluntary Injunction should be directed to the Law Department.

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In addition, as part of the healthcare reform law, Open Payments (the Sunshine Act) similarly requires that we track and report such information to the federal government.

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**Q: Is it illegal if we engage a doctor to be an investigator for a clinical trial to collect legitimate data about our product but also as a way to encourage the doctor to prescribe a Purdue product going forward?**

**A:** Yes, there can be a violation of the Anti-Kickback Law even if there are legitimate purposes for the payment. This is known as the "one purpose test." If even one purpose of the payment is to encourage the recommendation, purchase or use of prescription products, the payment could be deemed to have violated the statute.

Q&A

## Adherence to the PhRMA Code

The Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (the PhRMA Code) is based on the principle that a healthcare professional's care of patients should be based, and should be perceived as being based, solely on each patient's medical needs and the healthcare professional's medical knowledge and experience.

While not law, the PhRMA Code is recognized as a good faith effort to comply with applicable federal healthcare laws. While not a member of PhRMA, Purdue recognizes and supports the principles outlined in the PhRMA Code.

## Quality Control/Manufacturing

*Patient safety is of paramount importance. Quality is what customers, patients, prescribers, and other stakeholders expect from us.*

As a pharmaceutical manufacturer, Purdue has a special responsibility to make safe and effective products. To accomplish this, we must:

- Follow all government requirements, including good manufacturing practices, and all Company standards on product quality
- Adhere to Company business, quality, and compliance procedures
- Follow all procedures for the storage, handling, and shipping of products, and
- Follow all procedures regarding the reporting, investigation, and tracking of adverse drug events and product quality complaints so that this information can be properly reported to the appropriate regulatory authority in accordance with applicable laws and regulations.

## Adverse Event and Product Complaint Reporting

Purdue is committed to reporting safety information to the FDA and other regulatory authorities appropriately and in a timely fashion. Each of us is responsible for reporting information on the safety, quality, or performance of Purdue products, both investigational or marketed, that comes to our attention to ensure that we meet the highest levels of safety and quality standards as well as our regulatory obligations. We are ethically and legally obligated to track and report any adverse events or product quality complaints associated with our products. This data is used to provide the most accurate and up-to-date safety information to regulatory authorities, and potentially HCPs and patients. If you become aware of a potential adverse event or concern with one of our products, you must report that information within 24 hours (Day 0) of learning of it using one of the following mechanisms:

**WAYS TO REPORT AN AE/PC:** It is only necessary to report via one of the following methods.

- Phone: Dial **1-888-726-7535**, Adverse Event = Press 2, Product Complaint = Press 3
- Company Voicemail: can be forwarded to the phone number above (follow the prompts)
- Email:
  - » AEs: [AEReport2@pharma.com](mailto:AEReport2@pharma.com) (Company employees can select the "AE Report" address in Outlook)
  - » PCs: [productcomplaints@pharma.com](mailto:productcomplaints@pharma.com) (Company employees can select the "Product Complaints" address in Outlook)
- Report online through company website: <https://www.purduepharma.com/contact-us/> & <https://www.rhodespharma.com/contact/>

*Day 0 is the day on which a Company representative or representative from a third party with a contractual agreement with the Company becomes aware of a report containing AE and/or PC information. This is important as FDA regulations requires tracking of Day 0 to calculate reporting timelines.*



For more information, please refer to the Adverse Event/Product Complaint Reporting Policy on the [Policy Portal](#) of the Intranet.

## Clinical Research

New drugs must go through several layers of evaluation and governmental review. Most drugs that undergo preclinical (animal) testing never make it to human testing and review by the FDA. The drugs that do make it to human testing must undergo FDA's rigorous evaluation process, scrutinizing everything about the drug – from the clinical trials' design to the severity of side effects and the conditions under which the drug is manufactured.

A clinical trial is a research study with human volunteers to answer specific health questions. Our use of the data and other research and clinical studies supported by Purdue must promote legitimate research goals. The data and other information resulting from these trials must be completely accurate and truthful.

### More Information on Clinical Trials

Purdue is committed to the safety of the patients and volunteers who take part in our clinical trials, and to upholding the highest ethical, scientific, and clinical standards in all of our research initiatives worldwide. To ensure appropriate protection and respect for the rights of study participants, all Purdue-sponsored clinical studies are designed and conducted in accordance with all applicable laws and regulations.

## Disclosure of Data

Purdue upholds publication of truthful scientific information and supports authors who take responsibility and accountability for their published work. In the true spirit of science, we are dedicated to sharing our clinical trials information and data with patients, medical/research communities, the media, policy makers and the public. We do this in a manner that safeguards patient privacy and informed consent, respects the integrity of regulatory systems, and maintains incentives for investment in biomedical research. Purdue clinical trial results are available on the National Institutes of Health website at [www.ClinicalTrials.gov](http://www.ClinicalTrials.gov).



## Privacy of Health Information

Unless your job duties require exposure to a person's medical information, you should not need or be exposed to medical information of identified individuals. If your job duties require such exposure or you inadvertently learn about such information, it is Purdue's policy that you retain this information as confidential. Employees must guard the confidentiality of all medical information in their possession. The disclosure of confidential medical information is strictly prohibited by law. Note, however, that the reporting of medical information of an individual related to an adverse event is permitted if reported to Drug Safety and Pharmacovigilance. For more information, please refer to the Adverse Event/Product Complaint Reporting Policy on the [Policy Portal](#) of the Intranet.

Examples of information that must be protected include any information that can be used to uniquely identify someone. This includes (but is not limited to) names, social security numbers, driver's license numbers, dates of birth, genetic information, etc.

Protecting the privacy and security of personal information is a growing concern for companies and individuals alike. Preserving the privacy of personal information is critically important.

Remember that you must:

- Collect personal information only for legitimate business purposes
- Keep personal information only as long as necessary to fulfill legitimate business purposes and meet our legal obligations including document retention requirements
- Take precautions when collecting, processing, storing, and transferring information to ensure the personal information is as secure as possible
- Only share personal information with individuals who have a legitimate need for it



For more information, please refer to Purdue's Privacy Policy on the [Policy Portal](#) of the Intranet.

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**Q: I work with one of our contract research organizations (CROs). A CRO employee just sent me an email that included a significant amount of personal information about subjects involved in one of our clinical trials. What should I do with the information?**

**A:** *The Law or Ethics & Compliance teams should be notified of the breach, but do not forward the information to these teams unless directed to do so. You will be given specific guidance based on the circumstances of the disclosure.*

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**Q: Who shares personal information with Purdue?**

**A:** *Colleagues, job applicants, research study subjects, research investigators, patients, healthcare professionals, vendors, suppliers, and many other people provide personal information to Purdue. All these people/entities are entitled to and expect that their personal information will be protected.*

Q&A



## Fair and Balanced Marketing

Consistent with our Voluntary Injunction, Purdue keeps HCPs fully informed of the approved uses, safety, indications, contraindications, side effects, and characteristics of our products. Among other mechanisms, we provide this information using:

- Package inserts
- Mailings to healthcare professionals
- Approved educational and/or promotional materials
- Presentations by our field-based personnel

The information provided in these materials must be consistent with the FDA-approved label and scientific knowledge pertaining to the relevant products.

## Labeling

Purdue does not promote any Purdue products for uses other than those approved in accordance with applicable laws and FDA regulations. For prescription products, this information would be included in the product labeling. Labeling includes all labels and other written, printed, or graphic matter accompanying the product. Labeling must be truthful, balanced, and accurately communicated.

Pharmaceutical manufacturers cannot proactively promote, nor may they distribute, promotional materials that mention unapproved uses. Purdue may not promote a drug that is currently being investigated for a new use. There are limited exceptions to disseminate information concerning a drug before it has received marketing approval from the FDA. These exceptions must be approved in advance by an attorney in the Law Department. Please see Purdue's Healthcare Law Compliance policies for more information.

In certain limited circumstances, pharmaceutical manufacturers may distribute off-label information in response to an unsolicited request from a healthcare professional. In addition, occasionally there are scientific articles or other materials that may mention information that does not exactly follow the approved labeling. Communications of this sort are handled by Purdue's Medical Affairs and Medical Science Liaison Teams.

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**Q: I work in the commercial organization and met with a potential customer to promote one of Purdue's products. The customer asked me a question about an off-label use for the product. May I answer the question since it was unsolicited?**

**A:** No. You may only discuss on-label uses of the product and you may not engage in any discussion that is inconsistent with the product's labeling. You can refer the customer to Medical Affairs, but you may not answer the question.

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**Q: I have received an inquiry pertaining to opioids. While I used to work on the opioid brands and know the answer, I am not sure that I am allowed to respond. Am I?**

**A:** Consistent with our Voluntary Injunction, all inquiries pertaining to opioid products must be referred to Purdue's Medical Affairs Department for response.

Q&A

## Scientific Exchange

Scientific exchange refers to the bona fide exchange of medical and scientific information (i) through scientific dialogue that is conducted in a non-promotional context, or (ii) in response to an unsolicited question from a healthcare professional. It refers to the exchange of scientific information between appropriate medical or scientific employees and external stakeholders in order to advance scientific and medical understanding. Sharing scientific information about our products and our research is vital to our commitment to patients. We need to be mindful that healthcare laws place strict limitations on appropriate scientific exchange. Consistent with our Voluntary Injunction, Purdue is committed to engaging in appropriate scientific exchange concerning our research pipeline, marketed products and disease states of interest to Purdue.

### Scientific exchange must abide by the following principles:

- Scientifically rigorous and current, and contain appropriate safety-related data
- Data driven, balanced, objective, and unbiased
- Responses to unsolicited questions about unapproved uses must be narrowly tailored to answer the question posed
- Must be conducted in a non-promotional context
- Competent and reliable references should support the data

## Handling Controlled Substances

There are special rules and regulations regarding the handling, storage, and transfer of controlled substances, and all employees are required to strictly comply with all relevant policies and procedures. If you have any questions, please contact the Vice President, Ethics & Compliance or an attorney in the Law Department.

Employees are required to immediately report to Integrity Helpline 1-877-787-3831 any knowledge or suspicion regarding the improper handling, transfer, loss, or diversion of controlled substances. Failure to report such information in a timely manner may result in disciplinary action. Employees should be aware that failure to adhere to these rules and regulations could have serious adverse consequences for the Company and individuals.

## Corruption and Bribery

**Anti-Kickback Prohibitions.** The federal Anti-Kickback Statute prohibits the offering of anything of value to a person that is intended to influence that person to recommend, purchase, or prescribe a healthcare product (including a prescription medication) or service that may be reimbursed by federal healthcare programs, including Medicare or Medicaid. In part, this law is designed to ensure that a healthcare provider's decision about a choice of treatment or product for a patient will not be influenced by motives of personal gain or enrichment. In addition to the federal law, some states have similar laws prohibiting such activities in connection with state healthcare programs and/or private insurers. For more information on the Anti-Kickback Statute, please refer to Purdue's Healthcare Law Compliance Policies found on the [Policy Portal](#) of the intranet.



For more information, please refer to Purdue's Voluntary Injunction on the [Policy Portal](#) of the Intranet.

**Foreign Corrupt Practices Act.** Under the Foreign Corrupt Practices Act, it is illegal for the Company's employees to make, promise, offer, or authorize the making of a payment or provide anything of value to a non-U.S. Government Official to improperly or corruptly induce that official to make any government act or decision to assist a company in obtaining or retaining business, or to otherwise obtain an improper advantage. No payment to any foreign official should be made without consulting an attorney in the Law Department to determine whether the payment would be prohibited. For more information, please refer to the Anti-Corruption Policy on the [Policy Portal](#) of the intranet.

## Antitrust and Competition Laws

The federal government, most state governments, the European Union, and many foreign governments have enacted antitrust or "competition" laws. The laws prohibit illegal "restraints of trade," to ensure that markets for goods and services operate competitively and efficiently, so that (1) customers enjoy the benefits of open competition among their suppliers and (2) sellers similarly benefit from competition among their purchasers. In the United States and some other jurisdictions, violations of the antitrust laws can lead to substantial civil liability – triple the actual economic damages to the plaintiff. Moreover, violations of the antitrust laws are often treated as criminal acts that can result in felony convictions of both corporations and individuals.

United States antitrust and competition laws are very complex. Employees of the Company must be alert to avoid even the appearance of anti-competitive conduct. Purdue prohibits, among other things:

- Discussions or other contacts with competitors (i.e., a person/company in the same or similar industry who offers a similar product or service) regarding prices or other terms of doing business unless permitted in our Antitrust Policy found on our [Policy Portal](#) on the Company intranet.
- Discussions or other contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace
- Agreements with competitors regarding territories or markets in which competitive products are sold, allocating markets or customers
- Agreements with others to boycott customers or suppliers
- Agreements to force a customer to buy a product that it does not want as a condition of a sale of a different product or as a condition of Purdue purchasing products or services from that customer
- Predatory pricing, which occurs when a company with market power sells a product or service below cost so as to eliminate or harm a competitor, and
- Charging different prices to different customers for the same product if it adversely affects competition between those customers

Employees or representatives of the Company should never threaten to use the Company's market position (e.g., our strength in certain therapeutic categories) against a third party, boast about "dominance" or "market power," disparage competing products, or mislead a customer or supplier about a competitor. Although these actions are not in themselves violations of antitrust laws, they may create an appearance of improper behavior.



For more information, please refer to the Fair Business Practices and Antitrust Laws Policy on the [Policy Portal](#) of the Intranet.

**Q: My neighbor works for one of our competitors. Is it okay to discuss how the competitor company deals with managed care companies if we do it after-hours on our personal time?**

**A:** *No. Subjects that should not be discussed at a normal business meeting – because they would violate applicable law – should not be discussed in a social setting for the same reasons.*

Q&A

### ***Participation in Trade Associations or Other Forums for Discussion with Competitors.***

Although participation in trade associations and other professional organizations may serve a useful and legitimate purpose, such as exchanging information about government regulations, you must exercise caution as these meetings also bring together competitors who might discuss matters of mutual concern and potentially cross the line into noncompliance with antitrust and competition obligations. Employees should always clear their participation in such activities with their supervisors.

Generally, if employees have occasion to speak with competitors, they should avoid having business-related discussions in unstructured, casual circumstances, and should never discuss competitively sensitive subjects such as pricing, terms and conditions of doing business, customers, or markets. If a competitor begins to talk about any competitive topics (e.g., rebates), Company employees must publicly object to the discussion, leave the conversation, and immediately inform an attorney in the Law Department.

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#### **Q: Where can I find relevant policies and procedures?**

**A:** *Our corporate policies and procedures can be found on the [Policy Portal](#) of the Purdue intranet. Additionally, seek information on department policies and procedures from your manager. You are expected to understand how these policies and procedures apply to you and your role at Purdue and are required to follow them. We encourage you to discuss any questions or concerns with your supervisor or to request advice by contacting Ethics & Compliance or the Integrity Helpline 1-877-787-3831.*

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#### **Q: How is compliance with the Code of Ethics enforced?**

**A:** *Enforcing compliance with the laws, policies, and procedures described in our Code is the responsibility of the Chief Ethics & Compliance Officer and the Ethics & Compliance Department. Any violation of a law, regulation or Company policy can result in disciplinary action, up to and including termination of employment. For instance, disciplinary action would be warranted, if you:*

- *direct others to violate the law or our policies;*
- *fail to cooperate in a Company investigation of possible violations;*
- *retaliate against another individual for reporting a concern or a violation; or*
- *fail to effectively monitor the actions of your direct reports.*

Q&A

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**Q: What if I fear retaliation?**

**A:** Retaliation against any individual who seeks advice, raises a concern, or reports misconduct is strictly prohibited under Purdue's policies. If anyone retaliates against an individual who has truthfully and in good faith reported a potential violation, we will take appropriate action. If you suspect that you, or another individual, have been retaliated against for raising a good faith concern, you should contact the Vice President, Ethics & Compliance or call the Integrity Helpline at 1-877-787-3831.

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**Q: If I report a concern, should I expect a response?**

**A:** Yes. The Ethics & Compliance Department strives to respond promptly to all questions and reported concerns. If your concern requires an investigation, we will do so in a timely manner. Whenever possible, you will be informed about the status of the investigation and the outcome of a matter. Please keep in mind, however, that the Ethics & Compliance Department has confidentiality obligations to all employees – those being investigated as well as those making reports. Detailed information about any matter will only be shared with those who have a “need to know.”

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**Q: A shift supervisor has told me to “catch up later” on a quality control procedure. I think this violates Company policy, but she is the supervisor. Should I just follow orders?**

**A:** No. If you think that the supervisor is breaking the rules and you do not feel comfortable talking with your supervisor directly, contact your supervisor's manager, a member of the Corporate Security, Ethics & Compliance, HR or Law Departments. You also can anonymously report your concerns via the Integrity Helpline 1-877-787-3831.

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**Q: What are some real-life examples of anti-competitive behavior?**

**A:** Actions that might violate applicable antitrust or competition laws can take many forms. Beware of discussions or agreements with competitors that relate to prices; terms or conditions of sale; costs, profits, or profit margins; product or service offerings; production or sales capacity or volume; market share; coordination of bidding activities; dividing sales territories; or allocation of customers and/or product lines.

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**Q: During a family get-together, my parents' neighbor, an executive for a competitor, mentions that the competitor will be raising prices on over-the-counter products. What should I do?**

**A:** You should not discuss pricing, marketing programs, specific customers, or other prohibited topics with any competitor, regardless of your relationship with the competitor's representative. In this situation, you should inform the neighbor that it is inappropriate for you to discuss these topics and, if the conversation does not turn to acceptable topics, you should break off the discussion immediately.



# OUR COMPANY

We compete vigorously for business and expect that our conduct be consistent with the law and our commitment to integrity.

In this Section:

[Our Family of Companies](#)

[Confidential & Propriety Information](#)

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[Proper Retention of Business Records](#)

[Company Funds, Property, and Time](#)

[Company Computers, E-mail, and the Internet](#)

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Purdue seeks its competitive advantage through superior products, services, and performance, and never through unethical or illegal business practices. We compete vigorously for business and expect that our conduct be consistent with the law and our commitment to integrity. Purdue expects its employees to operate in the best interests of the Company, to be forthright about our operations and performance, and to exercise care in the use of Company assets and resources.

## Our Family of Companies

When we refer to “Our Company,” we are referring to Purdue Pharma L.P. and its subsidiaries. Our business model includes several different wholly-owned subsidiary companies of Purdue Pharma L.P., all of which are subject to this Code of Ethics and all of which are subject to the Purdue Pharma L.P. ethics and compliance program.



## Confidential and Proprietary Information

All Purdue colleagues must maintain the confidentiality of the Company's nonpublic information, as well as nonpublic information of outside parties, such as suppliers, customers, and business partners.

Much of the information you have access to at Purdue is proprietary. Proprietary information is a valuable corporate asset and must remain confidential. Unauthorized release of proprietary information through, for example, discussion with individuals outside the Company or sharing the information to outsiders, can have adverse consequences for Purdue and potentially for you.



For more information, refer to the Employee Manual.

**Proprietary information** includes, but is not limited to information relating to our products or business plans such as:

- technical data;
- regulatory data or plans;
- trade secrets and know-how;
- manufacturing processes;
- customer lists, vendor lists;
- formulas and formulations;
- future plans;
- finance or capitalizations;
- sales and marketing strategies;
- budgets;
- patent applications;
- compensation data;
- intellectual property; and
- research and development.

Each employee must safeguard all proprietary information and ensure that any access to such information given to a third party (outside of the Company) is restricted by the use of a confidentiality agreement approved by the Law Department and limited to those with a business need to know the proprietary information, unless further disclosure is appropriate and in the best interests of the Company. Employees must, for instance, exercise care as to how telephone, fax, copy machines, and e-mail are used, to avoid releasing proprietary information outside the Company. Special considerations related to remote working are included in our Data and Records Management in Remote Working Environment Policy on the [Policy Portal](#) of the Company intranet.

Employees also should not disclose proprietary information to others within the Company without first ascertaining that the employees have a need to know the information. To the extent that records may be disposed of under the Company's records retention policy, employees should be careful when disposing of materials containing proprietary information to ensure that such information has been disposed of in a manner that protects the confidential nature of the information.

Purdue also respects the proprietary nature of information of other companies, including competitors. Employees may obtain proprietary information regarding another company from prescribers or even from a competitor, but such information must not be shared or used in any way without the consent of the other company, unless it is publicly available (e.g., from the newspaper, from the other company's website, etc.).



For more information, see Guidelines to Prevent the Improper Use and/or Distribution of Purdue's or Other's Confidential Information.

## Best Practices for Protecting Confidential Information

- Do not use personal email accounts to forward confidential information or conduct Purdue business
- Do not discuss confidential information in public places
- Do not provide confidential information to third parties without first securing a confidentiality/non-disclosure agreement and approval from the Law Department
- Be wary of telephone or e-mail requests from third parties seeking information
- Keep your company passwords secure by not sharing them
- Do not disclose confidential information in social media
- Do not share confidential information from prior employers

## Guidelines for preventing improper use and/or distribution of Purdue's or its competitor's confidential information by candidates for employment or newly hired employees:

- Candidates interviewed for employment with Purdue are not expected to and should not discuss confidential information related to their current or former employers. If a candidate offers to discuss confidential information or to provide confidential documents from a current or former employer, the interviewer should instruct the candidate that such disclosure of documents is inappropriate. Similarly, employees should not share the Company's confidential information with a candidate.
- Candidates should be instructed to review their confidentiality or non-compete obligations with their employers to determine whether they are subject to any continuing obligations and to provide Purdue's Human Resources Department with the provisions of any written documents setting forth such obligations. Prior to any offer of employment being extended, an attorney in the Law Department must review any confidentiality or non-compete obligations.
- New hires should be told that they are expected to abide by any existing confidentiality and non-compete obligations with their former employers. New hires also should be told that no confidential information they may have retained from their former employers should be brought to Purdue or used during their employment with Purdue.
- Existing employees should not bring to Purdue or obtain, either orally or in writing, confidential information from their former employers. To the extent that an employee has or gains knowledge or possession of confidential information, such information should not be used in the course of performing duties for the Company or distributed to Purdue employees.

**Q: You recently left another pharmaceutical company and have a flash drive containing confidential information on a product in an early phase of development. You realize this information would be helpful in the clinical trial design of a Purdue compound. What do you do?**

**A:** *You may not use the information on the flash drive as doing so would violate Purdue's policy against use of a competitor's confidential information. You were advised in writing before receiving your offer of employment that you must not use or disclose any trade secret information learned in your prior employment and were counseled when you began work not to use or disclose the confidential information belonging to your former employer. You should consult with the Law Department if you ever have a question about whether you should use information you believe to be confidential and proprietary in nature that you obtained from a third party, including prior employers.*

Q&A

## Business Intelligence

*Business intelligence will be gathered through lawful and ethical means only, relying on public sources and not violating confidentiality requirements.*

In today's business environment, we have access to a great amount of public information about other companies, their products, and services. It is generally ethical and legal to have and make use of public information in conducting our business. You are free to gather intelligence about companies from public sources such as their websites, published articles, price bulletins, advertisements, brochures, public presentations, and customer conversations. You also may contract with an outside vendor to gather business information, but only if the selection and contracting process is approved by the Law Department. You should only accept business information about other companies when you believe that the receipt and use of it is lawful and ethical and does not violate anyone's confidentiality obligations. You must never use, or ask any third party to use, unlawful or unethical means such as misrepresentation, deception, theft, spying, or bribery to gather any such information.

**Q: My manager wants me to find out what patient recruitment exclusion criteria a competitor is using in an important clinical trial. That information is not publicly available. Can I pose as a potential patient recruit, call the competitor's clinical research site, and simply ask some questions?**

**A:** No. Misrepresentation – in this case, not disclosing that you are a Purdue employee – is an unethical way to gain access to a competitor's confidential information. Before you attempt to gather any non public business intelligence - meaning that which is not easily found in the public domain - you must consult with the Law Department to confirm that your strategy is legal and ethical.

Q&A

## Intellectual Property – Patents, Trademarks, and Copyrights

*The respect and protection of intellectual property is paramount - this includes both our intellectual property and that of others.*

A substantial part of the Company's business involves use and licensing of patents, trademarks, and copyrights, and use of rights licensed from others. Collectively, these and trade secrets are intellectual property. Purdue and its business partners invest extraordinary expertise and resources to make their products, and they expect their intellectual property to be respected and protected. The confidentiality of the Company's intellectual property is critical to the success of our business and must be strictly maintained. By the same token, Company employees should never take or accept from others information or materials known or believed to contain the trade secrets of a competitor.

The infringement of patents, use of trademarks without legal right, reproduction of copyrighted works, or use of trade secrets without permission could subject the Company to fines and even criminal punishment. No employee should use any intellectual property that does not belong to Purdue without first determining whether permission has been granted for that use. This would include, for example, the unauthorized copying of journals and publications and downloading of software, videos (e.g. YouTube), or music. If you have questions about this policy, please contact an attorney in the Law Department. For more information, refer to the Copyright Policy on the [Policy Portal](#) of the intranet.



## Company Assets: Protection and Use

*All Purdue colleagues share responsibility for protecting Company assets against loss, theft, or other improper use.*

Employees are expected to exercise good judgment when using Company property. Company assets should be protected from misuse, theft, or diversion. Any suspected product tampering, theft, or lack of internal control over products or other assets should be reported to Corporate Security. Incidental personal use of Company assets (e.g., telephone, computer, photocopier) is permissible where such use is of reasonable duration and frequency and does not consume a significant amount of resources.

Purdue has established specific policies related to the use of Company computers, networks, and software. Purdue also has established specific policies related to information security, electronic mail and related systems, internet use, electronic records and signatures, personal calls, and mail and voice mail use. Because all documents, including electronic communications, are the Company's property, they are subject to review at any time, as are all Company premises and systems. Although you may use Purdue electronic equipment for incidental personal matters, you are not guaranteed personal privacy on the Company's communication systems or regarding information sent to, from, or stored in Company systems. All employees are expected to abide by these policies.



A complete version of these policies can be found in the Employee Manual.

## Conflicts of Interest

*All Purdue colleagues have an obligation to conduct business in a manner that avoids actual or potential conflicts of interest.*

A conflict of interest occurs when you have a professional or personal interest that creates (or appears to create) undue influence on your professional judgment. The conflict may relate to your own personal interests or those of a relative, friend or other entity with whom you are involved. Conflicts of interest – whether actual or apparent – can often be managed or resolved. If you believe you have a potential conflict of interest, you are required to disclose it to your manager and the Ethics & Compliance Department so that safeguards can be established to protect all parties.

### **Q: Can I hold an extra part-time job in addition to my Purdue employment?**

**A:** *Employees may hold jobs outside of Purdue if the role has no impact on the performance of their Purdue job and it has been both approved by your manager and disclosed on your Conflict of Interest Certification. For example, a job as a weekend yoga instructor that does not impact company performance is different from employment with a potential supplier that could present a conflict of interest.*

**Q&A**

## Types of Conflicts of interest include:

### Outside Employment/Volunteer Positions

Purdue policy requires that all employees devote their full time and attention to the affairs of the Company and not engage in any other work, employment, or business activity, including as a paid board member of a for-profit or non-profit organization, unless such employee has obtained the Company's express prior written consent. Generally, the Company will not permit employees to serve as paid board members. Employees are encouraged to pursue volunteer endeavors. Company approval is required prior to accepting an appointment to serve in a leadership role or as a board member for a non-profit organization that may advocate positions related to pharmaceutical industry issues (e.g., healthcare, pain management, specific disease-related states). Employees wishing to accept volunteer positions related to pharmaceutical industry issues or any outside employment are required to contact Human Resources or Ethics & Compliance prior to accepting such positions. A review of the request will be conducted to ensure that no conflict of interest arises, and the requestor will be notified of the Company's decision. In all outside employment and volunteer positions, employees are required to abide by confidentiality and other obligations to Purdue.

The Voluntary Injunction addresses certain restrictions for participation in entities that engage in promotion relating to opioids, opioid products, the opioid-related treatment of pain, or products indicated to treat opioid-related side effects. For more information, please refer to the Voluntary Injunction and seek additional clarification or guidance, if needed, from the Law Department.

### Personal Investments or Transactions

Purdue respects your right to manage your personal investments. At the same time, you are responsible for avoiding situations that present – or create the appearance of presenting – a potential conflict between your personal financial interests and the interests of the Company.

Purdue policy requires that all employees devote their full time and attention to the affairs of the Company and not engage in any other work, employment, or business activity, including as a paid board member of a for-profit or non-profit organization, unless such employee has obtained the Company's express prior written consent. Purdue reserves the right to contact another organization or entity to ensure compliance with this prohibition or to otherwise protect Purdue's legitimate business interests including but not limited to protection of confidential information, trade secrets, inventions or other intellectual property. Employees are deemed to have consented to any such contact by Purdue by joining the organization.

### Personal Relationships

The Company permits the employment of relatives of employees and others with whom employees have an intimate personal relationship where such employment does not create an actual or perceived conflict of interest, subject to the certain guidelines outlined in the Employee Manual under the Section "Personal Relationships." Employment of relatives and others with whom employees have an intimate personal relationship will be reviewed by the Human Resources Department and the Law Department to determine if it is appropriate under the circumstances.

Not sure if you have a conflict of interest? Ask yourself these questions:

- Do I have a significant financial interest in any company that does business with Purdue?
- Do I spend significant time on outside work or hobbies during my workday at Purdue?
- Do I accept valuable and/or frequent gifts from suppliers, customers, or competitors?
- Am I in a position to hire or directly supervise a spouse, relative, or close friend?
- Do I have a business relationship with someone with whom I also have a personal relationship?

If you answered "yes" to any of the above questions, you may have a potential conflict of interest, which must be disclosed to the Law Department or the Vice President, Ethics & Compliance who will advise you on the proper action to take to minimize the actual or potential conflict.

**Q: I have been asked to serve on the Board of my local hospital. Am I allowed to do so?**

**A:** *You are not permitted to accept a position such as this without first raising the opportunity for review by Ethics & Compliance. Any appointment to serve as a director or officer of another entity must be approved in writing by the Vice President, Ethics & Compliance (or a designee).*

**Q: As part of my employment with Purdue, I participate as a member of an industry trade association. Is this permissible?**

**A:** *Yes. Purdue encourages its employees to participate in certain non-profit industry organizations. If you have a question about participating in an organization, please discuss it with your manager or the Ethics & Compliance Department.*

## **Acceptance of Gifts, Meals, Entertainment, or Other Favors**

*A Purdue employee must not give or accept gifts, meals, entertainment or other favors that could raise concerns about integrity.*

Purdue will treat fairly and impartially all persons and firms with which it has business relationships. These relationships will be established solely on their merits, in Purdue's best interests, and without regard to non-business-related considerations. Thus, employees must neither accept nor offer/provide gifts, meals, entertainment, favors, or similar gratuities that might influence or raise doubts as to the impartiality of the recipients and, where government contracts are involved, violate the law. The exchange of any such item must be of reasonable value, infrequent, related to a business purpose and customary from a business perspective. Lavish items are prohibited. If in doubt, please check with your manager.

Examples of Permissible Gifts/Meals:

- An item valued at \$25 or less when purchased singly on the open market; no more than \$100 total value from a single source in a calendar year
- Occasionally hosting or being hosted by a vendor – e.g., a non-lavish meal valued at less than \$100/person

### Sample Language for Return of a Gift:

Dear [Vendor]:

Thank you very much for your kind gift of [a telephone headset]. Purdue's Code of Ethics prohibits Purdue colleagues from accepting gifts that are valued at more than \$25. While I appreciate your kind gesture, as the value of this gift exceeds Purdue's limits, I am returning it to you with my sincere thanks. I value you as a colleague and trust that we will continue to have an excellent working relationship.

Sincerely,  
[Purdue Colleague]

## Insider Trading

**Insider trading, tipping and similar activities based on possession of material, non-public information are prohibited.**

Federal law and Purdue policy prohibits Purdue colleagues, directly or indirectly through their families or others, from purchasing or selling stock of a company with which Purdue does business while in the possession of material, non-public information concerning that company.

While Purdue is a privately held company, many companies with which Purdue does business issue securities (e.g., stocks, bonds, options, and other forms of investment instruments) that are publicly traded. These securities are subject to complex laws and regulations designed to prevent unlawful insider trading.

Both “insider trading” and “tipping” are illegal and violate this policy, and no employee may engage in either activity, either personally or on behalf of others, by trading on or communicating material non-public information. Insider trading may subject individuals and the Company to civil and criminal penalties and result in serious employment consequences whether or not the conduct rises to the level of illegal conduct.

Non-public information that is learned, ascertained, or otherwise acquired by way of employment or due to employment may not be used by a Purdue colleague, or on behalf of others, in decisions to buy, sell, or hold securities, stocks, hedge funds, or other traded commodities. In addition, a Purdue colleague is prohibited from using such information for personal gain, or for the gain of others.

Example of Insider Trading in Real Life:

For example, if you know about a pending license deal between Purdue and a public company, you have inside information as to that stock and should not buy or sell any shares of that company or discuss it with others who do not have a need to know such information. If you are interested in purchasing stock in such company, you must discuss your plans with the Ethics & Compliance Department or an attorney in the Law Department and receive approval to engage in such trading. Employees directly involved in such transactions, such as those working in Business Development, Law, Finance, Sales and Marketing, and Corporate Communications are prohibited from making such investments unless maintained in non-discretionary accounts.

In addition, Purdue colleagues are required to complete a Conflict of Interest Certification form listing any ownership interest (including stock ownership) in companies with which Purdue does or seeks to do business to alert the Ethics & Compliance Department to any potential conflicts of interest with respect to such ownership interests. You are required to contact the Ethics & Compliance Department if circumstances change which may require the updating of a prior Conflict of Interest Certification so that the form may be updated and to fully cooperate with any inquiries the Ethics & Compliance Department may make with respect to such disclosure.

When in doubt, information obtained in your role as a Purdue colleague should be presumed to be important and not public. To reduce the risk of wrongful use of “insider” information, non-public information should not be discussed with unauthorized persons (i.e., with persons either in the office or outside the office who do not have a “need to know” such information for purposes of Purdue’s business).

**Q: I am a researcher and have learned that Purdue is about to receive approval from the Food and Drug Administration to market a new product, but that this information will not be made public for another few weeks. To manufacture this new product, I know that Purdue will need to purchase large quantities of raw materials from one supplier that is a publicly traded company. Based upon this information, can I, or my spouse, purchase stock in this publicly traded company?**

**A:** Absolutely not. Neither you nor your spouse can purchase this stock until the information you have is known to the public. If you use this information or convey it to others, you will be violating Company policy and securities laws and exposing yourself, your spouse, and possibly others to civil and criminal penalties.

## **Accurate Books and Records**

**Business records will be completed accurately and honestly and will be appropriately maintained.**

Accurate records are essential to ensure the proper conduct of business and compliance with the law. All of Purdue's transactions must be recorded accurately, completely, and in a timely fashion. All assets and liabilities of the Company must be recorded in Purdue's regular books of account using generally accepted accounting principles.

- Never make false or inaccurate entries in any of the Company's records
- Never understate or overstate reports of sales or expenses, or alter any documents used to support any corporate reports

If any other employee, including a manager or an outside party, requests that you falsely or inaccurately record information of any kind, you are required to report that to a manager, the Vice President, Ethics & Compliance, or the Corporate Security, HR or Law Departments. You may also make a report via the Integrity Helpline.

## **Proper Retention of Business Records**

Purdue has established a records retention policy that may be supplemented from time to time by litigation holds, which establish specific retention requirements in connection with a lawsuit or governmental investigation. All employees are required to be knowledgeable about and to comply with the records retention guidelines, including applicable litigation holds. If you are unsure whether documents under your control should be preserved, always err on the side of retention. For more information, refer to the Records Retention Policy, as well as an associated litigation holds that may be effective, found on the [Policy Portal](#) of the intranet.

**Q: What is a business record?**

**A:** A business record is any recorded information captured in any physical or electronic medium that is created or maintained as part of conducting business for Purdue. Examples include but are not limited to paper documents (including hand-written notes), audio or video tapes, and computer-based information such as e-mail, computer files, text messages and any other medium that contains information about Purdue and/or its business activities.



## Company Funds, Property, and Time

Our use of Company funds, property, and time directly impacts our profitability, so we must use these valuable assets with care, protecting them against misuse or theft. This means:

- Employees are expected to behave responsibly and exercise good judgment when using Company property
- Incidental personal use of Company assets (e.g., telephone, computer, photocopier) is permissible where such use is of reasonable duration and frequency and does not consume a significant amount of resources
- Company assets should be protected from misuse, theft, or diversion. Any suspected product tampering, theft, or lack of internal control over products or other assets should be reported to Corporate Security
- When working on Company time, do not allow outside interests to interfere with job responsibilities
- If you must report your work hours, do so truthfully and accurately

**Q: Is it okay for me to browse the Web from my office or e-mail a family member to make personal plans, such as who will pick up the kids after work?**

**A:** Yes, occasional and limited personal use of Company systems is acceptable if it does not interfere with your job responsibilities. However, recreational “surfing” of the internet is much like browsing through a magazine. Just as you would not sit at your desk reading magazines instead of working or bring magazines to work that are potentially offensive or threatening to other employees (for example, violent or sexually oriented materials), you should not use Purdue time or equipment to browse the internet nor should you ever “surf” the Web for potentially threatening or offensive topics.

**Q: I sometimes ask my administrative assistant to access my email account with my network password to manage my calendar and file emails – does this qualify as acceptable use?**

**A:** No, you may not share your network password with anyone except in limited technical support situations where you then change your password immediately thereafter. Outlook offers a range of delegation rights so that administrative personnel can manage their supervisor’s email efficiently.

Purdue supports a wide range of electronic devices and networks to help people work as effectively as possible. Mobile phones, internet access, email and other systems can significantly enhance our productivity but when used inappropriately, pose substantial risk to both data and systems.

Q&A



Keep the following guidelines in mind:

- Only approved mechanisms, tools, and procedures should be used to access the company network.
- Passwords should never be revealed or shared and should be changed immediately if compromised.
- You are prohibited from installing unauthorized software on your Company-owned computer.
- Consistent with this Code, business information should only be shared with authorized parties using Company-approved technologies.
- Managers and contractor sponsors must ensure their direct reports, and contractors are off-boarded within 24 hours of termination of an engagement.

Although you may use Company electronic equipment for incidental personal matters, except where mandated by law, you are not guaranteed personal privacy for information sent to, from, or stored in Company communication systems. Also, since all documents, including electronic communications, are the Company's property, they are subject to review at any time.

## **Company Computers, E-mail, and the Internet**

Internet access and other electronic communication systems, such as email and voice mail, greatly aid our day-to-day business. However, there are several precautions we must take to maintain the integrity of our technology and information.

Purdue has established specific policies related to the use of Company computers, networks, and software. Purdue also has established specific policies related to information security, electronic mail and related systems, Internet use, electronic records and signatures, personal calls, and mail and voice mail use.

Because all documents, including electronic communications, are the Company's property, they are subject to review at any time, as are all Company premises and systems. Although you may use Purdue electronic equipment for incidental personal matters, you are not guaranteed personal privacy on the Company's communication systems or regarding information sent to, from, or stored in Company systems.

All employees are expected to abide by these policies. A complete version of these policies can be found in the Employee Manual, which is also available on the [Policy Portal](#) on Purdue's intranet website.

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**Q: My family and friends email me at work, keeping me up-to-date on events and funny stories. These are personal messages. Can I expect them to remain private on my Purdue laptop, or does the Company have access to these messages?**

**A:** *Although you may use your Purdue computer for incidental personal reasons, computers and all information stored on the Company computer systems, including any emails or documents sent and received through Company equipment using personal, password-protected Web-based accounts, are Company property and may be subject to monitoring. Purdue owns both your computer and all information stored on it. Purdue may review any of those materials or systems at any time. Remember also that email creates a permanent electronic record.*

**Q&A**

# OUR EMPLOYEES

Purdue is committed to treating all employees and applicants with honesty, fairness, and respect.

In this Section:

At-Will Employment

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Equal Opportunity

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Discrimination/Harassment-Free Work Environment

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A Work Environment of Respect & Dignity

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Compliance with Employment Laws

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Ensuring Safety

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Background Checks, Exclusion, Debarment & Suspension

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Purdue is committed to treating all employees and applicants with honesty, fairness, and respect. To create a work environment where people are treated respectfully and fairly, we will provide fair and equitable treatment for all employees, promote a positive and collaborative work environment, and protect the health and safety of all employees. We will not engage in any form of discrimination, harassment, or retaliation. For more information, please refer to the Employee Manual on the [Policy Portal](#) of the intranet.

## **At-Will Employment**

Each Purdue employee is employed by the Company on an at-will basis (unless otherwise agreed upon in writing and subject to applicable laws). At-will employment means that employment is not guaranteed for any specific amount of time, and the Company retains the right to terminate an individual's employment at any time with or without cause or notice. No oral representations made by any Purdue employee with respect to continued employment can alter this relationship. For more information, please refer to the Employee Manual on the [Policy Portal](#) of the intranet.

## **Equal Opportunity**

Providing equal employment opportunity to employees and applicants is an important practice at Purdue. It is Purdue's policy to comply with all relevant federal, state, and local laws with respect to equal employment opportunity for employees and applicants in all aspects of employment, including hire, terms and conditions of employment, benefits, discipline, and termination. It is Purdue's policy to ensure equal employment opportunity without discrimination or harassment based on race, color, national origin, religion, sex, age, disability, genetic information, marital status, sexual orientation, gender identity or expression, or any other status protected by law. Purdue prohibits and will not tolerate any such discrimination or harassment. For more information, please refer to the Employee Manual on the [Policy Portal](#) of the intranet.

## **Discrimination/Harassment-Free Work Environment**

Purdue is committed to a work environment in which all individuals are treated with respect and dignity. Each individual will be permitted to work in a business-like atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Purdue expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment.

Retaliation in any form against an individual who reports a violation of law, regulation, or Purdue policy, or against an individual who assists in the investigation of a reported violation, is prohibited. Purdue's Anti-Harassment and Non-Discrimination Policy is contained in the Employee Manual, which is also available on the [Policy Portal](#) on Purdue's intranet Website.

If you observe or experience any form of harassment, report it to your immediate supervisor, Department Head, the Vice President, Human Resources or another member of the Human Resources Department, the Vice President, Chief Compliance Officer, or an attorney in the Law Department. For more information, please refer to the Employee Manual on the [Policy Portal](#) of the intranet.

## A Work Environment of Respect & Dignity

*Purdue is committed to a work environment in which all individuals are treated with respect and dignity. Purdue prohibits and will not tolerate discrimination or harassment.*

Examples of Prohibited Behavior Under Purdue Policy Include:

- Jokes, slurs, and other remarks that are about race, religion, or ethnic origin, or are of a sexual nature
- Unwelcome sexual advances or requests for sexual favors
- Verbal remarks or physical conduct that interfere with another person's work performance or that create an intimidating, hostile, or offensive working environment
- Retaliation against individuals who have made a complaint or participated in an investigation or lawsuit

**Q: My co-worker keeps telling racially charged jokes and thinks they are funny, but the jokes make me feel uncomfortable. What should I do?**

**A:** *Your co-worker should be made aware that the jokes are creating a negative work environment. You are encouraged to speak with the co-worker yourself or to report this to your supervisor. You also can report such conduct to your manager, the Ethics & Compliance Department, the Vice President, Human Resources, a Human Resources Business Partner, or an attorney in the Law Department.*

Q&A

## Compliance with Employment Laws

*Purdue is committed to compliance with applicable state and federal human resource laws.*

- **Wage and Hour Laws:** The Employee Manual sets forth the Company guidelines and requirements pertaining to reporting of hours worked and deductions that may be taken from pay.
- **Immigration Status:** The Company is committed to complying with the immigration laws of the United States and any other countries in which we do business. In compliance with United States immigration laws and regulations, Purdue will verify each employee's identity and authorization to work in the United States prior to beginning employment. Employees are expected to cooperate in this process and are required to provide the Company with information on any change in to their work authorization as soon as the change occurs.
  - » Important Reminders about Immigration Requirements:
    - You should never assist a prospective employee in misrepresenting an immigration status or evade the verification process.
    - Failure to verify a prospective employee's employment status or properly complete the required documentation in a timely manner may subject the Company to civil or criminal penalties.



- **Human Trafficking:** Purdue has adopted a Policy Against Trafficking in Persons. Conduct prohibited by this policy includes conduct in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events, and during non-working time. Employees who engage in conduct which violates this policy may be subject to disciplinary action up to and including termination of employment. The Federal government has adopted a “zero tolerance policy” regarding trafficking in persons. As a government contractor, Purdue and certain employees are prohibited from:
  1. Procuring sex acts on account of which anything of value is given to or received by any person;
  2. Engaging in sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act is younger than 18 years old;
  3. Engaging in the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
  4. Using forced labor in the performance of the contract;
  5. Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as a passport or driver’s license, regardless of the issuing authority;
  6. Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and if applicable, the hazardous nature of the work;
  7. Using recruiters that do not comply with local labor laws of the country in which the recruiting is taking place;
  8. Charging employees recruitment fees;
  9. Failing to provide return transportation or pay for the cost of return transportation at the end of employment for specified employees;
  10. Providing or arranging housing that fails to meet the host country housing and safety standards; and
  11. If required by law or contract, failing to provide an employment contract or other work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment at least five days before an employee relocates to perform the work. Employees who engage in conduct which violates this policy may be subject to disciplinary action up to and including termination of employment. Conduct prohibited by this policy includes, but is not limited to, conduct in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events, and during non-working time.

For more information, please refer to the Employee Manual on the [Policy Portal](#) of the intranet.

## Ensuring Safety

*Purdue is committed to providing a safe workplace for all employees.*

- **Violence & Threats of Violence:** Violent acts or threats of violence against any other person's life, health, well-being, family, or property are prohibited and will not be tolerated. Concerns should be promptly reported to the Corporate Security, Human Resources, or Ethics & Compliance Departments.
- **Environment, Health & Safety:** Purdue is committed to conducting its operations and managing its products in a manner that is protective of environment, health, and safety (EHS) concerns of our employees, customers, and the public. In the course of Purdue's operations, the Company handles and utilizes many chemical substances that are regulated at the national, state, and local levels as hazardous substances or hazardous wastes. As such, the Company is required to comply with a wide range of EHS requirements. Under many of these EHS standards, the Company is financially and legally responsible for the proper handling and disposal of these materials. The Company provides training and information pertaining to chemical substances, hazardous substances, and hazardous waste to facilitate a safe and healthy work environment and minimize any EHS risks associated with Company operations.



Questions about the possible health or safety hazards at any Company facility should be directed immediately to your supervisor, the local site leadership team, the Vice President, Ethics & Compliance, or an attorney in the Law Department.

### Q: Must I report every injury I receive while on the job?

**A:** *Yes, you must promptly report all of your injuries, even the minor ones. Sometimes, even seemingly minor injuries can result in serious health consequences. Reporting all of your injuries ensures proper medical treatment and preventive measures are taken for yours and others' safety.*

Q&A

- **Occupational Health & Safety:** Purdue is committed to providing a safe workplace for all employees. In addition, several laws and regulations impose responsibility on the Company to prevent safety and health hazards. For that reason, and to protect the safety of themselves and others, employees and other persons who are present at Company facilities are required to follow carefully all safety instructions and procedures that the Company adopts.
- **Drug-Free Workplace:** As an organization covered under the Drug-Free Workplace Act, every location at which Company business is conducted is declared to be a drug-free workplace. Purdue supports the responsible use of alcohol during non-working hours and does not condone consumption of alcoholic beverages during working hours. Consumption of alcohol in Purdue facilities is prohibited absent prior written approval from management. The Employee Manual further addresses this topic.

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**Q: My co-worker has recently been coming into work with alcohol on her breath. While she doesn't seem impaired, I worry that she may be drunk on the job. I'm afraid to confront her. What should I do?**

**A:** *If you suspect a co-worker has been reporting to work under the influence of drugs or alcohol, she could be compromising her own and other employees' safety as well as her ability to perform on the job. Therefore, you should immediately contact the Human Resources Department.*

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**Q: I think I might have a substance abuse problem. What resources are available to me through Purdue?**

**A:** *If you're concerned that you may have a problem with alcohol or drugs, we strongly encourage you to seek help by contacting counseling professionals available through our Employee Assistance Program (EAP). Information on the EAP is available through Human Resources.*

Q&A

## **Background Checks, Exclusion, Debarment & Suspension**

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*Purdue employees are background checked and periodically screened and are required to report criminal conduct, exclusion, department or suspension.*

- **Background Checks/Exclusion Status:** All candidates for employment undergo a background screening process that includes a review of federal healthcare program exclusion status. Periodic screening of exclusion databases is also conducted on all current employees. Initial and continued employment or other affiliation shall be contingent upon obtaining a signed authorization for the procurement of, and satisfactory outcome of, background screening.
- **Obligation to Report:** Individuals are required to report to the Human Resources Department or any attorney in the Law Department as soon as possible, but in no circumstance later than two days after such event, the following circumstances:
  - » Being **debarred** under the Federal Food, Drug and Cosmetic Act
  - » Being **excluded, debarred, suspended, or deemed otherwise ineligible** to participate in any federal or state healthcare program (e.g., Medicare or Medicaid) or in federal or state procurement or non-procurement programs
  - » Being **cited for, arrested for, convicted of, plead guilty, or "nolo contendere"** (an agreement not to contest criminal charges) to any violations of federal, state, or local law (with the exception of minor traffic infractions)
  - » Being **on notice of circumstances** that may lead to the individual's being excluded, debarred, suspended, or otherwise ineligible to participate in any federal or state healthcare program (e.g., Medicare, Medicaid) or in federal or state procurement or non-procurement programs

# OUR COMMUNITY

Purdue's dedication to meet evolving needs of healthcare professionals, patients, and caregivers carries through to the communities we serve.

## In this Section:

[Charitable Contributions](#)

[Patient and Professional Organizations](#)

[Political Activity](#)

[Lobbying Activity](#)

[Media and Public Inquiries](#)

[Social Media](#)

[Interactions with Private Attorneys](#)

[Interaction with Government Entities and Employees](#)

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Purdue's dedication to meet the evolving needs of healthcare professionals, patients, and caregivers carries through to the communities we serve through partnerships, grants, in-kind giving, and volunteerism.

Being a responsible corporate citizen is a priority for us and our efforts are focused on:

- Helping to address the opioid addiction crisis
- Supporting responsible use of controlled substances
- Supporting wellness and economic development efforts in the communities where we live and work

As individuals and as a company we will:

- Work to protect our environment and the health and safety of employees, customers, and the public
- Respond to public, media, and government inquiries appropriately
- Conduct political activity lawfully and responsibly
- Support medical, educational, cultural, and civic initiatives aligned with our mission

## Charitable Contributions

*Purdue is dedicated to the communities where we live and work.*

Purdue considers grant support and charitable donations for a variety of initiatives. While we place particular emphasis on corporate citizenship in communities where we operate our businesses, we also support national, regional and local initiatives to help address the opioid addiction crisis and support responsible use of controlled substances.

Charitable donations are never made by Purdue with an intent to influence the prescription or purchase of Purdue products. If an employee receives a query about Purdue making a charitable contribution or grant, they should direct requestors to the Purdue Grants & Giving website. For more information, refer to the Grants and Donations Standard Operating Procedure on the [Policy Page](#) of the intranet.

**Q: An employee receives a call from a local hospital. The hospital acknowledges that the employee works for a company that makes pain management medications. The hospital then asks the employee to make a charitable contribution to support the hospital. In requesting this donation, the hospital indicates that it is a “big consumer” of Purdue products and “hopes that will continue to be the case in the future,” and that they are calling all Purdue employees for a donation. What should the employee do?**

**A:** *Under both the Anti-Kickback Statute and Purdue's Healthcare Law Compliance Policies, the Purdue employee may not contribute to the hospital. Solicited donations of this sort are not allowed under Purdue's policies, regardless of whether they are paid for with Company funds or personal funds. The employee should report the call to the Ethics & Compliance Department.*

Q&A



## Patient and Professional Organizations

*Purdue respects the independence of patient organizations.*

Purdue complies with the laws and regulations ensuring transparency and high legal and ethical standards in our interactions with patient and professional organizations.

Purdue no longer funds continuing medical education grants.

## Political Activity

*Purdue encourages appropriate participation in the political process.*

Purdue authorizes only specified individuals to act in the political process on behalf of the Company in the course of their job duties. Any other political participation must occur strictly in an individual and private capacity and not on behalf of the Company. An employee may voluntarily choose to contribute (without Company supplies or reimbursement) to a political candidate, party, or political action committee.

The Voluntary Injunction restricts the provision of financial support or in-kind support to any third party for purposes of promoting opioids or opioid products. For more information, please refer to the Voluntary Injunction and seek additional clarification or guidance, if needed, from the Law Department.

**Q: I am running for a public office – a spot on the local school board. I want to send out an email from my work account to my colleagues at work letting them know about a fundraiser I'm having. May I?**

**A:** No. Although employees are permitted to make occasional use of e-mail, you are prohibited from using Company property and equipment, which includes corporate email addresses, for political purposes.

Q&A

## Lobbying Activity

*Purdue lobbying activities are restricted as it relates to contracting with the government.*

Purdue may not pay for lobbying activities with money derived from federal contracts. Contracts with U.S. Government personnel for the purpose of influencing legislation, regulations, or decision making may constitute lobbying that triggers registration and disclosure requirements. If a Company employee or retained consultant communicates with any public official or the official's staff, the Company may be obligated to register as a lobbyist or comply with other regulations. All Company personnel, including others working on Purdue's behalf, are responsible for understanding the applicable rules, timely reporting of required information, and working with Government Affairs and the Law Department to ensure compliance in this area.

The Voluntary Injunction specifically addresses the permissibility of certain lobbying activities. For more information, please refer to the Voluntary Injunction and seek additional clarification or guidance, if needed, from the Law Department.

## Media and Public Inquiries

*Purdue is committed to delivering accurate and reliable information to the media and members of the public.*

Employees should not communicate with the media regarding Company-related business unless authorized by the Corporate Communications and Law Departments. Any inquiries from the media should be directed to the Corporate Communications Department.

**Q: An employee in Finance is called by a local newspaper asking for some general information about Purdue. Is the Finance employee authorized to answer the questions?**

**A:** *No. Even the most straightforward questions must be forwarded to [news@pharma.com](mailto:news@pharma.com). No one should respond to a reporter's questions without the involvement of Corporate Communications.*

## Social Media

*We will responsibly use social media.*

Business and personal use of social media relating to the Company, its business, or its employees, whether on or off working time or Company equipment, must comply with our Social Media Policy found on the [Policy Portal](#) on the Company intranet.

## Interactions with Attorneys Not Representing Purdue

*To the extent a current employee is contacted by an attorney regarding Purdue business, the employee should immediately notify the Law Department.*

Although there are ethical rules that should prevent any lawyers representing another party in a lawsuit from trying to contact you, it is possible that a private attorney or an investigator may attempt to contact you with regard to a Company matter. Should such a contact occur, you should refuse to engage in discussion and immediately notify the Law Department.

## Interaction with Government Entities and Employees

*Purdue cooperates with all federal, state and local government requests for information and employees are expected to respond promptly, accurately, and completely to all such requests.*

If you are contacted by any government entity, notify appropriate site management, responsible department heads, and the Law Department.

**Q: What should I do if I receive a request from a government investigator?**

**A:** *These requests and inquiries are often time sensitive, so contact your manager and the Law Department immediately. Request credentials and explain to the investigator that you are required to submit all inquiries and requests to the Law Department.*

