



GUIDANCE FOR VENDORS AND SUPPLIERS



PURDUE PHARMA L.P. AND ITS SUBSIDIARY COMPANIES

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PURPOSE & VALUES

Purdue Pharma L.P. and its subsidiaries (the Company) are focused on upholding our Purpose and Values in all our decisions, actions, and behaviors.

COMPASSION For Patients And **EXCELLENCE** In Science
Inspire Our Pursuit Of New Medicines



October 2025

Vendors and Suppliers,

Purdue Pharma L.P. and its subsidiaries (“Company”) aim to maintain high standards of integrity and to apply the highest ethical standards in all business activities. Our Vendors and Suppliers are an essential part of the overall success of the Company. The Company and its Vendors and Suppliers make decisions that impact our ability to provide quality healthcare products to its customers.

To reinforce the standards to which the Company holds both itself and its Vendors and Suppliers, we have created this Guidance for Vendors and Suppliers (“Guidance”), reflecting our shared dedication to maintaining our Purpose and Values. Our expectation is that our Vendors and Suppliers will, at a minimum, operate in full compliance with all applicable laws, rules, and regulations and note that specific terms and conditions of Vendors and Suppliers contract terms govern. Additional resources can be found on the [Ethics & Compliance page](#) of the Company internet site.

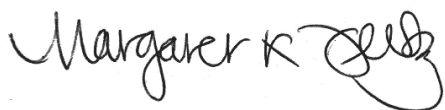
Our expectation is that each of our Vendors and Suppliers operate in an ethical manner and in compliance with this Guidance. We appreciate that you/your organization may have your own set of values and policies in place, however, we ask that you please take the time to understand ours and ensure that they are in alignment with your own.

We have established a mechanism for reporting concerns, our Integrity Helpline. In the case of known or suspected concerns, please feel free to contact:

- A member of the Ethics & Compliance Team at compliance@pharma.com or
- The Purdue Integrity Helpline: 1-877-787-3831

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 individuals who report issues in good faith is strictly prohibited.

Thank you for taking the time to review this Guidance and please [be in touch](#) with any questions.



Margaret K. Feltz
Vice President, Chief Compliance Officer

GENERAL PROVISIONS

The Company expects Vendors and Suppliers to follow established practices around Documentation, Training and Business Continuity sufficient to support our business requirements.

Documentation

Vendors and Suppliers shall maintain documentation necessary to demonstrate compliance with the expectations/requirements outlined in this Guidance, as well as compliance with applicable laws, regulations and standards governing the pharmaceutical industry. Vendors and Suppliers shall maintain record management and retention policies governing documents, information, and records consistent with their industry, applicable laws and regulations and the nature of the work being performed for the Company. Document retention obligations are set forth in Vendor and Supplier contracts. In the absence of such guidance, documents should be retained for a period of no less than seven (7) years following the expiration/termination of the contract, unless otherwise agreed in a writing between the parties.

Training and Competency

Vendors and Suppliers shall train their workers, and, as appropriate, subcontractors, to achieve an appropriate level of knowledge, skill, and ability to manage and address the expectations set forth in this Guidance. Vendors and Suppliers shall provide such training and retain documentation demonstrating satisfactory completions of such training in accordance with the requirements above on Documentation.

Vendors and Suppliers should review training requirements with their Company business partner to ensure appropriate training is provided, if necessary, as it pertains to healthcare compliance laws and policies.

Investigations

Vendors and Suppliers shall provide [written notice](#) within 24 hours to the Company's Ethics & Compliance Department in the event that a federal, state, and/or local enforcement agency and/or regulatory authority investigation is initiated against it related to its business with the Company and will provide regular written notification regarding the progress and outcome of the investigation. During such investigation, Company, Vendors and Suppliers will address any modifications necessary to the Documentation requirements.

Business Continuity

Vendors and Suppliers are responsible for developing and implementing appropriate business continuity plans for all operations supporting the Company's business.

ETHICAL BUSINESS PRACTICES

The Company expects Vendors and Suppliers to conduct their business in an ethical manner and to act with integrity.

Voluntary Injunction

Vendors and Suppliers should be aware that the Company is operating under a Voluntary Injunction and shall take no action to cause the Company to violate its requirements. One of the central provisions of the Voluntary Injunction is that the Company is prohibited, directly or through third parties, from promoting opioid medications to health care providers. We therefore require our Vendors and Suppliers to comply with that provision and not disseminate on our behalf information to health care providers that is either likely or intended to influence prescribing practices of health care providers in favor of prescribing greater amounts, quantities, doses and/or strengths of opioid medications.

Business Integrity

In all dealings on behalf of the Company, Vendors and Suppliers will be honest and accurate, never intentionally make misrepresentations about the Company, and always comply with applicable federal, state, local and international laws.

Preventing Bribery and Corruption

Vendors and Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Vendors and Suppliers shall employ fair business practices. Vendors and Suppliers shall comply with the Foreign Corrupt Practices Act and all other applicable anti-bribery statutes.

Antitrust

Vendors and Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable antitrust and competition laws. Vendors and Suppliers must avoid even the appearance of anti-competitive conduct by complying with domestic and foreign antitrust or competition laws. This means that any conversation, understanding or agreement to fix prices, split territories, markets, or customers, participate in bid rigging or other anti-competitive behavior is prohibited.

Interactions with Healthcare Professionals (HCPs)

In interactions with HCPs, institutions, advocacy groups, and patients, Vendors and Suppliers must follow both the letter and the spirit of the law, conducting all interactions ethically and in compliance with applicable laws, regulations, guidelines, and industry codes and standards.

Our Company is required to disclose various types of information to government agencies. As our Vendor/Supplier, if you make payments to third parties on our behalf, this information may be reportable. We require that you comply with our data transmission requirements and timelines.

Product Communication

Vendors and Suppliers should only provide information about Company products when authorized in writing to do so. This includes communications about our products in person or through written material, and delivered through any channel, including the internet. This is due to the fact that product communication is highly restricted and permitted only if specifically authorized in writing and pursuant to contract terms and if the communication has been first approved by Company.

To the extent a Vendor/Supplier is authorized in writing to discuss our products, that Vendor/Supplier must follow the highest ethical standards, keeping discussions truthful, not misleading, and fair and balanced. Likewise, all discussions must be consistent with the product label or messaging and materials approved through our Material Review Process.

Clinical Trials

When engaged in clinical trials on the Company's behalf, Vendors and Suppliers are expected to do so in accordance with all applicable guidelines, federal, state, and local laws, and regulations, as well as stringent medical, scientific, and ethical principles.

Adverse Event and Product Complaint Reporting

- When engaged on behalf of the Company, Vendors and Suppliers who learn of an adverse event or product complaint pertaining to a Purdue product (or a product with an unknown manufacturer with the same active ingredient as a Purdue product) are required, within 24 hours of learning the information, to follow all procedures regarding the forwarding of adverse drug events and product quality complaints to the Company.
- For Adverse Events, please do one of the following:
 - Send an email to AEReport2@pharma.com
 - Call our Drug Safety Line at 888-726-7535, Prompt 2
- For Product Complaints, please do one of the following:
 - Send an email to ProductComplaints@pharma.com
 - Call our Drug Safety Line at 888-726-7535, Prompt 3

Animal Welfare

Animals should be treated humanely, minimizing pain and suffering. Animal testing should be performed using the fewest number of animals and in a way that minimizes distress. Alternatives should be used whenever scientifically valid and acceptable to regulators. Animal testing should be done in accordance with all applicable guidelines, federal, state, and local laws, and regulations, as well as stringent medical, scientific, and ethical principles.

Conflicts of Interest

Vendors and Suppliers must avoid transactions or relationships that are or appear to conflict with Company business. The Company and its suppliers are expected to use good judgement and to avoid situations that can lead even to the appearance of a conflict of interest.

Vendors and Suppliers that do business with us shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of the Company. All Vendors and Suppliers shall notify the Company immediately in the event of a potential or actual conflict of interest by sending an email to compliance@pharma.com.

Equal Employment Opportunity

The Company is an equal employment opportunity employer that does not discriminate based on any characteristic protected by law. We require the same of our Vendors and Suppliers.

INFORMATION ACCURACY AND PROTECTION

Vendors and Suppliers have a duty to protect the Company's confidential and proprietary information and must demonstrate compliance with Information security standards and common technical security requirements while supporting activities undertaken on behalf of the Company.

Confidential and Personally Identifiable Information Management

Vendors and Suppliers shall safeguard and make only proper use of Confidential Information in accordance with the confidentiality terms of their contracts with the Company, applicable laws, regulations standards and Company requirements. Confidential Information includes business information of a proprietary nature not known to the public. In addition, Vendors and Suppliers shall safeguard Personally Identifiable Information (PII) in accordance with federal, state, and local laws and regulations governing privacy such as the Health Insurance Portability and Accountability Act (HIPAA), and the California Consumer Privacy Act (CCPA) and the General Data Protection Regulation (GDPR). Vendors and Suppliers must ensure that Confidential Information and PII entrusted to the Vendor/Supplier is protected at all times. Vendors and Suppliers shall assist the Company in complying with data privacy laws including any request by a consumer exercising its right to request access to, or deletion of its PII under applicable privacy laws.

Information Security

Vendors and Suppliers are responsible for maintaining appropriate information security for transmitted, stored, and processed data in support of the Company's business. Vendors and Suppliers must comply with federal, state, and local information security standards as well as the Company's internal information security standards (e.g., End Point, strong authentication processes commensurate with risk; encryption; vulnerability management program; security testing; security awareness). Vendors and Suppliers must comply and cooperate with any information security assessment conducted by the Company to ensure due care of our information assets.

COMPLIANCE WITH LABOR LAWS

Vendors and Suppliers shall be committed to uphold the human rights of their employees and treat them with dignity and respect.

Freely Chosen Employment

Vendors and Suppliers shall not use forced, bonded, involuntary, slave or indentured labor.

Child Labor and Young Workers

Vendors and Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing obligatory education.

Non-Discrimination and Anti-Harassment

Vendors and Suppliers shall provide a workplace free of harassment and discrimination.

Vendors and Suppliers shall not discriminate for reasons such as actual or perceived race, sex or gender (including pregnancy, childbirth, lactation and related medical conditions), national origin, ancestry, citizenship status, creed, religion, color, age, sexual orientation, marital status, gender identity or gender expression (including transgender status), protected medical conditions as defined by applicable state or local law, genetic information, physical or mental disability, political affiliation, union membership, veteran status and military service, or any other characteristic protected by local, state, or federal laws and ordinances (referred to as "protected characteristics"). Retaliation in any form against an individual who reports a violation of law or regulation, or against an individual who assists in the investigation of a reported violation, is prohibited.

Anti-Trafficking of Persons and Slavery

Vendors and Suppliers through whom the Company conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.

Fair Treatment

Vendors and Suppliers shall provide a workplace free of harsh and inhumane treatment, including any sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

Wages, Benefits and Working Hours

Vendors and Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Vendors and Suppliers shall, in a timely manner, communicate with workers the basis on which they are being compensated. Vendors and

Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Vendors and Suppliers shall respect the rights of workers, as required by local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation, or harassment.

SAFE WORK ENVIRONMENT

Vendors and Suppliers shall provide a safe and healthy working environment.

Worker Protection and Safety

Vendors and Suppliers shall operate in compliance with all applicable health and safety regulations and ensure safety management systems are in place to prevent work-related personal injuries.

Vendors and Suppliers shall take reasonable measures to protect workers from overexposure to chemical, biological, physical hazards, and physically demanding tasks.

Process Safety

Vendors and Suppliers shall have programs in place to prevent or mitigate incidents associated with operations and processes that could result in catastrophic impact to people or the environment.

Emergency Preparedness and Response

Vendors and Suppliers shall identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

Hazard Information

Vendors and Suppliers shall make available safety information relating to hazardous materials in the workplace to educate, train, and protect workers from hazards.

Environmental Authorizations

Vendors and Suppliers shall comply with all applicable environmental laws, regulations, codes, and other governmental requirements and authorizations. Vendors and Suppliers shall obtain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations and restrictions.

Waste and Emissions

Vendors and Suppliers are expected to have systems in place to ensure the safe handling, movement, storage, recycling, reuse, and/or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health should be appropriately managed, controlled and treated prior to release into the environment.

Vendors and Suppliers must comply with all federal, state, and local laws and regulations regarding waste and emissions.

MAINTAINING QUALITY AND THE SUPPLY CHAIN

Vendors and Suppliers shall provide products and services of the highest quality to protect the health and safety of patients and consumers.

Product Quality

Vendors and Suppliers involved in the supply, manufacturing, packaging, testing, storage, and distribution of materials and/or products on the Company's behalf will ensure compliance with applicable Quality regulations and current Good Manufacturing Practice and current Good Laboratory Practice requirements for the markets in which the products are registered and distributed.

Supply Transparency

Upon request, Vendors and Suppliers shall provide information regarding their supply chain to support the Company's compliance with manufacturing practices, regulatory requirements, regulatory agency expectations, disclosure responsibilities and policies and the Company's other legitimate business purposes. Vendors and Suppliers will comply with all applicable federal, state, and local laws and regulations including but not limited to the California Supply Chain Transparency Act.

Supply Disruptions

Vendors and Suppliers shall inform the Company of financial, economic, supply changes or other material conditions that affect or might affect the ability to supply the Company or its ongoing operations or operating decisions.

Supply Chain Security

The Company maintains membership in supply chain security programs that require it and any supply chain partners to meet or exceed acceptable warehouse, transportation, and cargo security standards. Supply chain partners may be subject to audit for the purpose of validating the Company's supply chain security profile. In the event of an audit, Vendors and Suppliers must participate and cooperate fully with the Company and assist in all audit needs and inquiries.