

**APOTEX**

Canadian-Based  
Global Health Company

# CODE OF CONDUCT AND BUSINESS ETHICS

Our Code is Our Culture





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## A MESSAGE FROM ALLAN OBERMAN

At Apotex, our Purpose is to improve everyday access to affordable and innovative medicines and health products for patients and consumers worldwide. This serves as the very essence of our culture.

Over our 50-year history, we have established a position of invaluable trust within the global healthcare community that is upheld through the Apotex Code of Conduct and Business Ethics (“Our Code”). Our Code reflects who we are and what we stand for—individually and as an organization—and makes clear the ethical behaviours we are expected to embody and that our stakeholders can rely on us for.

Our Winning Behaviours firmly underpin Our Code’s principles of business ethics.

**Individual accountability:** Individual accountability drives us to do what we say we will do. This underscores the importance of delivering on our commitments and builds trust and credibility within our teams and with our stakeholders.

**Rigor and discipline:** Rigor and discipline encourages us to make plans and follow processes. This motivates us to work with foresight and thoughtfulness, creating a culture of excellence and reliability.

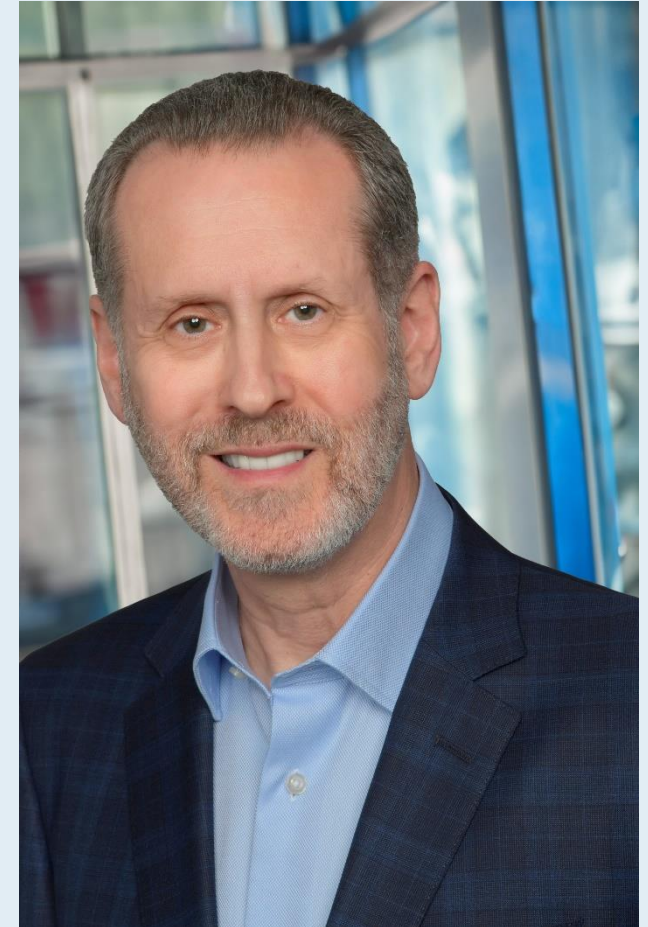
**Continuous improvement:** Continuous improvement recognizes that the pursuit of growth and progress is never finished. It means identifying opportunities to do better and being able to identify misconduct, helping safeguard our reputation and ensuring Apotex remains a company that we can all take pride in working for.

I am proud to lead a company dedicated to high ethical business standards and practices, including empowering each of us to speak up when we believe it is necessary.

Thank you for your ongoing commitment to building a culture of integrity.



Allan Oberman  
President and CEO



# OUR CODE

WE LIVE OUR PURPOSE, WINNING BEHAVIOURS AND VALUES

Looking for a Policy or Procedure?

→ Visit our Policy Hub for all corporate Apotex policies and business procedures.

[Policy Hub](#)



# Our Purpose

We improve everyday access to affordable, innovative medicines and health products for patients and consumers worldwide.

# Our Winning Behaviours



## Individual Accountability

“I do what I say I will do”



## Rigor & Discipline

“I make plans and follow processes”



## Continuous Improvement

“I always strive to do better”

## Our Values



**SPEAK UP**



# Who is Accountable for Our Code?

Each of us is accountable for upholding the principles of Our Code. Integrity must be at the core of every business decision you make. Our Code applies to:

- All Apotex employees.
- Members of the Apotex Board of Directors when they act in their capacity as directors. The Board is also responsible for monitoring compliance with the Code. Any waivers from the Code which benefit Directors or Executive Officers must be granted by the Board (or committee of the Board) only.
- All People Leaders who are expected to:
  - Act as role models encouraging ethical decision making;
  - Be champions of our Speak Up culture;
  - Recognize and reward behaviour showcasing our Purpose, Values, Winning Behaviours, and Our Code;
  - Assist in enforcing Our Code;
  - Treat employees who speak up with respect and uphold our non-retaliation policy; and
  - Report any violations or potential violations of Our Code in a timely manner.

If you violate Our Code, our policies or the law, it may result in:

- Disciplinary action, ranging from additional training and coaching to employment consequences, including termination of employment.
- Civil and/or criminal penalties imposed by a governmental agency or a court.

## Why do we have a Code of Conduct?

Outline our company's commitment to acting ethically in all facets of our business

Provide a roadmap of our policies, procedures, and guidelines

Set out the high business standards our employees are expected to uphold when conducting business worldwide

# How to Show Individual Accountability

## Respect and Follow Our Code and Policies

By following Our Code and policies and making ethical business decisions, you allow Apotex to maintain an excellent reputation, be a great place to work, and achieve its goals.

It is your responsibility to review, understand and follow the policies that apply to the work you do and the decisions you make.

As a global business, Apotex is committed to complying with the laws, rules and regulations of the countries we operate in. If you are unsure, seek guidance to ensure compliance with applicable local laws.

- Act with integrity, doing what is right and being transparent
- Report misconduct
- Do not take shortcuts that will compromise doing business ethically
- Seek guidance
- Lead by example

## What is my individual accountability?



### Individual Accountability

“I do what I say I will do”

Learn more...  
[Policy Hub](#) and  
[Document Collections](#)

**SPEAK UP**



# OUR VOICE

OUR EMPLOYEES ARE OUR VOICE

## Ask yourself: Is this activity...

- Inconsistent with Our Code and a breach of Our Values, Winning Behaviours, corporate policies or the law?
- Putting other people at risk?
- Impacting Apotex's reputation or breaching the trust of Apotex stakeholders?

If you answered 'yes' to any of the above

Then it might not be the right thing to do. If you are unsure, you should seek support in making the right decision.

If you have any questions about Our Code,

Speak Up!

**SPEAK UP**



# Speak Up

Apotex will support you when you decide to Speak Up. When employees Speak Up, we are better able to detect instances of non-compliance that may harm the reputation and continued success of our company. If you suspect something might be a violation of Our Code, our policies or the law, it is **your responsibility** to Speak Up and report it. There are several channels to Speak Up listed on the next page.

## Report Without Fear of Retaliation

Apotex is committed to ensuring its employees feel comfortable speaking up when a suspected compliance issues arises, without fear of retaliation.

Our company will not retaliate or permit retaliation against a person who in good faith:

- Reports what they believe is a violation of Our Code, our policies or the law (including to government authorities);
- Raises a compliance question or seeks advice about a particular business practice, decision or action; and
- Cooperates in an investigation of an actual or suspected violation.




Apotex does not condone frivolous, malicious or vexatious complaints. Employees who make such complaints will be subject to disciplinary action.

Learn more...  
[Global Speaking  
Up Policy](#)

**SPEAK UP**

## Speak Up Channels

Channel	Contact
<p><b>People Leader</b></p> <p>Your People Leader plays an important role in our Speak Up culture. In most cases, your People Leader should be your first point of contact. Be sure to contact your People Leader immediately should you be faced with an urgent issue such as workplace violence, employee health and safety, or quality concerns.</p> <p>Your People Leader is also a primary resource regarding your job responsibilities, specific workplace processes and procedures, co-worker issues, compensation and promotion opportunities, and issues related to the work environment.</p>	<ul style="list-style-type: none"> <li>- Your direct People Leader</li> </ul>
<p><b>Management</b></p> <p>Discuss questions, ideas, and concerns without fear of reprisal. All People Leaders are available to help; consult the person with whom you feel most comfortable.</p>	<ul style="list-style-type: none"> <li>- Your People Leader or someone else in your division</li> <li>- Any other People Leader</li> <li>- Company leadership</li> </ul>
<p><b>Human Resources</b></p> <p>Human Resource Business Partners (HRBPs) at your site are an excellent source of guidance. Your People Leader may raise concerns that you share with HR for additional support.</p>	<ul style="list-style-type: none"> <li>- The HRBP at your site</li> </ul>
<p><b>Global Legal</b></p> <p>You may contact your regional legal department if you have any concerns that conduct may be illegal or if you need guidance concerning laws and regulations affecting your business activities.</p>	<ul style="list-style-type: none"> <li>- <a href="mailto:APOgloballegal@apotex.com">APOgloballegal@apotex.com</a></li> </ul>
<p><b>Global or Regional Compliance Officer</b></p> <p>Contact Global Business Ethics and Compliance (GBEC) directly to ask questions, present ideas, or raise concerns. The GBEC website and the Policy Hub include additional policies, procedures, and resources.</p>	<ul style="list-style-type: none"> <li>- Your Regional or Global Compliance Officer</li> <li>- <a href="mailto:Ethics.compliance@apotex.com">Ethics.compliance@apotex.com</a></li> <li>- <a href="#">GBEC Website</a></li> <li>- <a href="#">PolicyHub</a></li> </ul>
<p><b>APOspeaks</b></p> <p>Apotex’s ethics helpline APOspeaks provides a way to report concerns or get advice, 24/7, 365 days per year, with multiple language and anonymous reporting options.</p>	<ul style="list-style-type: none"> <li>- <a href="http://www.APOspeaks.com">www.APOspeaks.com</a></li> </ul> 
<p><b>Data Privacy and Security</b></p> <p>Contact Data Privacy and Security if you have questions about the Use of IT Assets or data privacy and immediately in instances where you are aware of a situation where Apotex IT assets or data may be compromised or lost, or if there is a potential breach of personal information.</p>	<ul style="list-style-type: none"> <li>- <a href="#">GIS Privacy and Security</a></li> </ul>

Learn more...  
[Global Speaking Up Policy](#)

# APOspeaks

## What is APOspeaks?

APOspeaks is our ethics helpline and centralized reporting system. All reports of potential misconduct, including violations of Our Code, corporate policies, laws or regulations are escalated to APOspeaks for tracking and management. APOspeaks is managed by an independent third-party helpline provider and is available 24 hours every day with anonymous reporting options (subject to local restrictions).

## What happens when I use APOspeaks?

When you use APOspeaks, your concern is sent to Global Business Ethics and Compliance for a confidential review. The review will determine what type of inquiry is needed and an investigator may be assigned. Any information you provide, including your identity, to assist the investigator will be kept confidential, except as needed to conduct a full, fair investigation or as otherwise required by applicable law.

<http://www.APOspeaks.com/>



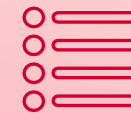
### Our Investigation Procedure



Employees who may have knowledge about the alleged incident(s) will be contacted.



Investigator will objectively determine facts through conducting interviews and/or review of other evidence.



Investigator will determine if the report is substantiated. A report will be provided to senior management and HR for next steps.

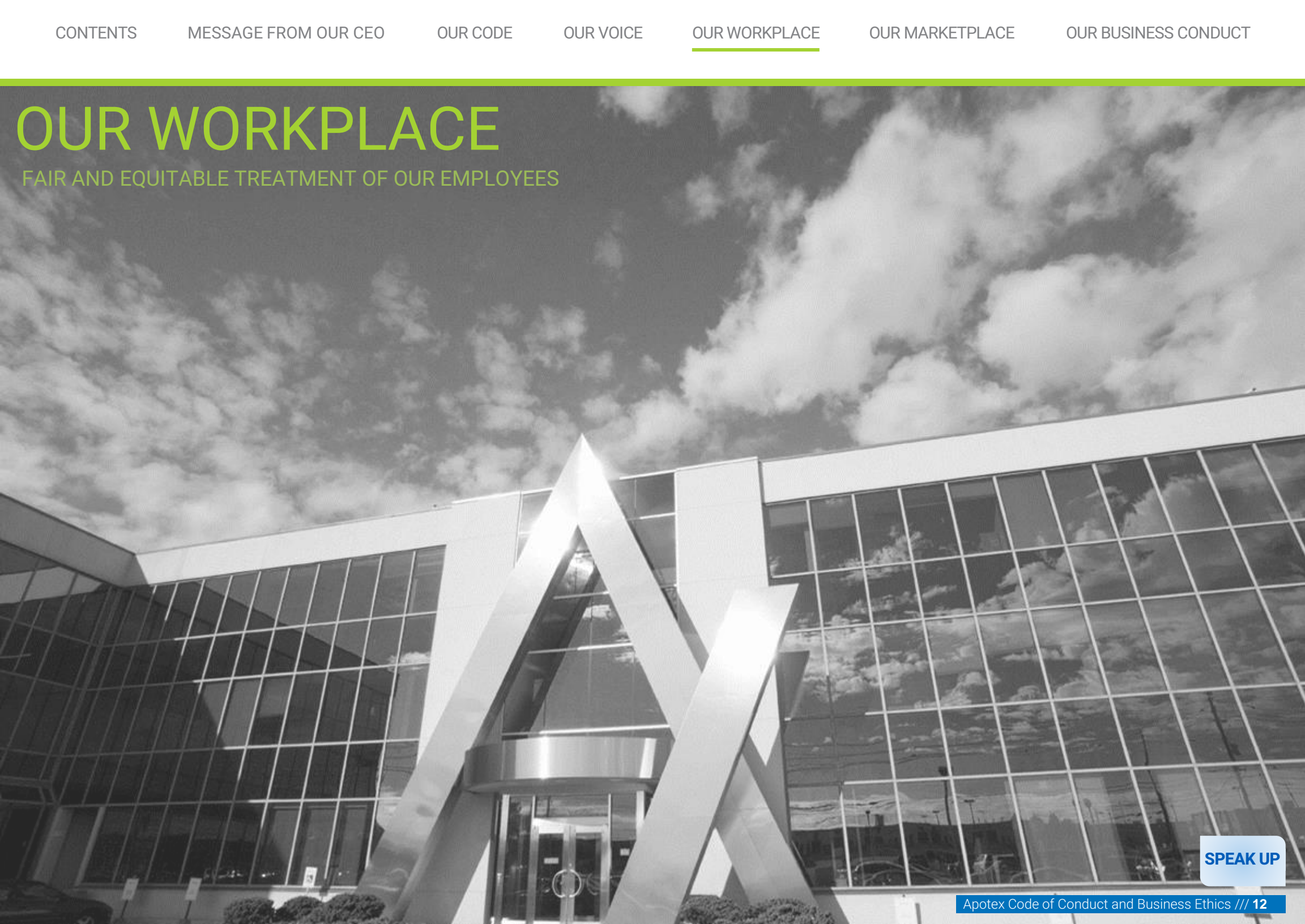


All employees must cooperate fully with an inquiry or investigation and keep their involvement confidential from others.

**SPEAK UP**

# OUR WORKPLACE

FAIR AND EQUITABLE TREATMENT OF OUR EMPLOYEES



**SPEAK UP**



# Working Together

## Human Rights

Apotex holds all employees and business partners accountable to just, fair and equitable conduct and prohibits any unfair treatment or discrimination based on race, religion, national origin, age, colour, gender, sexual orientation, marital status, disability, or any other status protected under applicable laws.

## Respectful Workplace

Apotex expects all employees to act professionally when interacting with colleagues, customers and other business contacts. Maintaining a respectful workplace is integrated within Apotex's Values and Winning Behaviours.

## Employment Law

Apotex is committed to upholding applicable employment laws and labour standards. These include the [Ethical Trading Initiative \(ETI\) Base Code](#), freely chosen employment, freedom of association, living wages, working hours, discrimination, child labour, and working conditions.



## Equal Employment Opportunity

Apotex is committed to providing equal opportunity based on individual qualifications and job performance. Apotex will act fairly and respectfully throughout the employment relationship, including the hiring, promotion, development, and termination processes.

Learn more...  
[Regional Harassment Policies](#)



## Freedom from Workplace Harassment, Discrimination, and Violence

Apotex promotes and values a work environment free of discrimination, harassment, sexual harassment, and retaliation, as defined by applicable laws. Workplace harassment, bullying or violence of any kind will not be tolerated and may result in disciplinary action up to and including termination of employment.



## Diversity, Equity, and Inclusion

Apotex strives to understand, value and incorporate the differences each team member brings to our organization. It is vital for us to build teams that represent the diversity of our global customers. Apotex employees can expect an environment where their differences are welcomed and valued. Employees are reminded to express their opinions and concerns in a respectful manner. To the extent that employees engage in conduct which disrupts operations or creates a hostile work environment such employees may face disciplinary action up to and including termination of employment.



# Workplace Environment, Health & Safety

## Meeting Environment, Health & Safety Standards

All employees have an obligation to each other and our patients to ensure work conditions meet our environment, health and safety (EHS) standards.

We require our all employees, contractors and visitors to:

- Comply with all applicable EHS policies and procedures;
- Attend all relevant EHS training;
- Use all necessary personal protective equipment (PPE) to perform work in a safe manner;
- Promptly report all EHS concerns including unsafe conditions, near misses, workplace injuries and illnesses, hazardous environmental releases; and
- Cooperate with the investigation of EHS incidents, and the execution of corrective actions.

## Reporting Concerns

If you become aware of a potential or actual EHS hazard or concern **immediately** notify your direct People Leader. People Leaders **must** report all incidents (including near misses) and environmental hazards according to both site and Global EHS standards.

Learn more... [Global EHS Policy and Substance Use and Abuse Policy](#)

## Refraining from Substance Use

Employees are expected to be **'fit for duty.'**

That means, the following are **prohibited**:

- Working under the influence of alcohol or drugs on or off Apotex premises, including remotely on video conference platforms (e.g., Microsoft Teams).
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working or on the premises.
- Working while impaired: due to a condition and/or substance that impacts the ability to work safely.

# Environmental, Social & Governance



## Environment

We recognize the importance of being good stewards of the environment and have established a comprehensive approach to integrate sustainable practices into our operations around the world.



## Social

Our social commitment is centered on three pillars: Putting Patients First, Supporting Communities, and Empowering Employees.

### Putting Patients First

Ensuring our patients have access to medicines is key to delivering on our purpose.

### Supporting Communities

Through access, affordability and innovation we recognize the important role we play in supporting the communities in which we operate.

### Empowering Employees

At Apotex, our employees are the driving force behind the company's success. We strive to create a workplace that prioritizes employee health, safety, and well-being.



## Governance

We understand that effective governance is essential to maintaining our industry-leading position. Our leadership team is focused on promoting and reinforcing a strong culture of integrity and ethical behaviour throughout the organization.



# OUR MARKETPLACE

## FAIR DEALING

### Our Responsibility



Each of us is accountable to deal fairly with Apotex's stakeholders, customers, suppliers, competitors and employees. None should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.



# Product Safety

Learn more...  
[APOweb](#)  
[Document](#)  
[Collections](#)

Every Apotex employee is required to report Adverse Events (AE) potentially relating to Apotex products to Apotex Drug Safety within one day of learning of the AE. Try to obtain the four elements listed below before reporting an AE:



Name of the reporter (contact information is highly desirable)



Patient information (at least one demographic parameter)



Adverse event term



Suspected Apotex product

Report all AEs, no matter the severity or seriousness (i.e., life threatening)

Apotex Drug Safety

Email: [drug.safety@apotex.com](mailto:drug.safety@apotex.com)

Fax: 1-866-429-9133 or 416-401-3819

Phone: 1-800-667-4708 or 416-401-7780 (follow prompts).

# Research and Development

Employees must adhere to recognized ethical standards and Good Clinical Practices (GCP) in clinical and non-clinical research and development.



# Quality Standards

At Apotex, producing safe, high-quality products is everyone's responsibility. We are all accountable. Everything we do has a direct impact on our customers and patients which is why we need to ensure we're getting it right at every step of the way.

We are committed to driving a strong, accountable Quality Culture throughout Apotex. A culture that "owns" Quality Excellence throughout the product lifecycle and one that encourages a compliant, proactive and preventive mindset, in alignment with our Winning Behaviors.

It is paramount as Apotex employees that we follow the Winning Behaviours embedded into our Quality Culture.



## Continuous Improvement

"I always strive to do better"

### Our Commitment

Maintaining the safety of our patients and the quality and integrity of our products.

Right for the patient, Right the first time, Right even when no one is looking.



Learn more...  
[Quality Policies and Procedures](#)

**SPEAK UP**

## Checklist when Interacting with HCPs

- ✓ Ensure the purpose of the interaction is to provide accurate, relevant, and valid information about our products.
- ✓ Never promise or provide payments and gifts to HCPs as inducement to purchase, prescribe or recommend our products.
- ✓ Ensure payments to HCPs are of fair market value and for legitimate business purposes (e.g., for bona fide research or consultancy).
- ✓ Country-specific rules applying to marketing activities, payments, and gifts to HCPs are followed.
- ✓ Contact the Global Business Ethics and Compliance Officer when you make a payment to an HCP, Healthcare Organization or Patient Association.

Learn more...  
[Interactions with HCPs](#)  
[Canada](#), [United States](#),  
and [Middle East](#) policies

# Interactions with Healthcare Professionals (HCPs)

Apotex employees must not violate country-specific laws (“anti-kickback laws”), that prohibit any payments intended to reward past prescribing behaviour or to induce an HCP to purchase, prescribe or recommend a product.

All interactions with HCPs should be guided by applicable national and regional laws, regulations, industry associated codes and Apotex policies. Violations of healthcare, fraud and abuse laws may result in severe corporate or individual penalties including large fines, jail sentences, and other country-specific legal ramifications.



# Product Communications

Learn more...  
[Regional Promotional  
Material Review  
policies](#)



If you receive a request for medical information contact DISpedia (Apotex's Drug Information Service):

Email: [dispedia@apotex.com](mailto:dispedia@apotex.com)

Phone: 1-800-667-4708

By web request: <https://www.apotex.com/dispedia/ca/en>

If you receive a request for customer service or product complaints contact Customer Service at:

Email: [cservice@apotex.com](mailto:cservice@apotex.com)

Phone: 1-800-268-4623

Fax: 1-800-665-2854

Business Hours: Monday to Friday from 9:00 a.m. to 5:00 p.m. (EST).

- Product communications must be truthful, balanced and accurate, and in accordance with relevant laws and regulations.
- Only promotional material, programs and initiatives that have been formally approved by Apotex may be used to market our products.
- All promotional statements and materials must be consistent with the approved Apotex product label. 'Off-label' promotion is strictly forbidden. Only designated and qualified medical and drug information personnel may answer unsolicited questions regarding off-label uses of Apotex products.
- Ensure third-parties who distribute Apotex products are aware of their compliance obligations.





# Interactions with Business Partners

Create business partnerships (e.g., with suppliers and wholesalers) after reviewing the relevant background and qualifications of potential partners, and ensure quality and integrity are built into your selection criteria.

To the extent possible, your due diligence should include:

- Ensuring business partners who will represent Apotex know their obligations to follow applicable laws, regulations and Apotex policies;
- Using price, quality, reputation and service as the drivers for making supplier selection, not a conflict of interest (see [‘Conflicts of Interest’ section](#));
- Ensuring that prospective business partners commit to proper interactions with government officials and HCPs;
- Treating business partners with respect and integrity. Negotiate in good faith and honour agreements made with them;
- Conducting third-party due diligence as per corporate procedures where certain in-scope high risk third-parties undergo additional screening before they are hired; and
- Ensuring our Suppliers are aware of Apotex expectations to comply with the Global Supplier Code of Conduct.

## Modern Slavery Statement

Apotex will not tolerate any form of modern slavery or human trafficking within our organization or supply chains.

We recognize that these crimes are a violation of basic human rights and are contrary to Apotex’s Purpose, Values, and Winning Behaviours.

We expect our suppliers and business partners to hold their suppliers and business partners to the same high standards.

Learn more...  
[Supplier Code of Conduct](#)  
 and [Third-Party Due Diligence Procedure](#)

# Interactions with Competitors

## Avoiding Anti-Competitive Violations

- Compete with others based on innovation, efficacy, quality, service, performance and price.
- Do not communicate with competitors about competitive business matters such as prices, costs, discounts, customer suppliers, marketing plans, production capacities or any terms or conditions of sale that could create the appearance of improper agreements or understandings.
- Do not make agreements or reach understandings with competitors regarding allocation of customers, territories or market share.
- Do not conspire with other bidders when competing for contracts.
- Do not enter into agreements that limit production capacities.

## Examples of Unfair Competition

- Using bribes as a method to gain market share.
- Disparaging one of our competitors or its products.
- Interfering with our competitors' supply chain or customer contracts.
- Obtaining or attempting to obtain competitive business intelligence through unlawful or unethical means such as misrepresentation, deception, theft, espionage or bribery.
- Coercing a customer to buy from us.



It is important that we recognize the potential harm to Apotex's reputation and the severe monetary and criminal penalties that may result from breaching these laws.

If faced with a situation that may raise anti-competitive (i.e., antitrust) issues, contact the Global Legal department to determine the proper course of action.



Learn more...  
[Global Competition  
Law Policy](#)

# Anti-Corruption

Apotex conducts business in many countries around the globe and prohibits corruption in all business dealings. Violations of anti-bribery laws hold serious consequences for corporations and individuals.

You must never make any offer, promise, or provide a gift of any value to anyone, directly or indirectly through a third-party, to improperly obtain or retain business, influence business decisions or secure an unfair business advantage. This is called a kickback or a bribe.

Learn more...  
[Apotex Global Risk Compliance Policy](#)

(includes our policy on gifts and hospitality)

## Examples of Bribes

- Cash
- Gifts
- Hospitality (travel, meals, and entertainment)
- Donations, including political donations
- Sponsorships
- Job offers
- Anything of value for the recipient (including their immediate family members)





# Anti-Corruption

## Government Officials

A government official is an individual, whether elected or appointed, who holds a legislative, administrative or judicial position of any kind. Depending on the jurisdiction, physicians and other HCPs may be considered government officials.

There are heightened risks and rules when contracting with the government. Ensure you understand the rules (e.g., for gift giving) and contact the legal department should you have any questions. You must get pre-approval from Global Business Ethics and Compliance before giving anything of value to government officials. All payments, either directly or indirectly through a third-party, must be accurately recorded in our business records.

Certain third-parties must undergo due diligence before engaging with them.

## Political Activities

Political lobbying and donations, are highly regulated and restrictions and requirements differ globally. It is critical that you do not:

- Engage in lobbying or political contributions on behalf of Apotex without the direct involvement of Global Legal. Any lobbying activities performed on behalf of the company must be recorded as per company lobbying procedures.
- Use Apotex funds or resources for your personal political contributions. Your decisions to contribute your own time or money to any political activity are entirely personal and voluntary.

Learn more...  
[Apotex Global Risk Compliance Policy](#), [Third-Party Due Diligence Procedure](#), and [Global Lobbying and Political Contributions Policy](#)



## What are Business Gifts?

Anything of value (including business entertainment or social events), provided on behalf of Apotex or received by an Apotex employee from a Third-Party.



Contact Global Business Ethics and Compliance for any additional questions you may have regarding business gifts.

Learn more...  
[Apotex Global Risk Compliance Policy](#)  
 and [Global Conflicts of Interest Policy](#)

# Business Gifts

Before any business gift is exchanged, you must ensure it is not intended to influence a specific business decision, is without risk of reputational harm, and is permitted under our policies and the corporate policies of the business partner.

Business gifts build goodwill and strengthen relationships with customers, suppliers and business partners, not to gain unfair advantage for Apotex or to obtain a personal benefit.

In addition, you must comply with the following requirements:

- Gifts must be consistent with reasonable customary business practices and must **not** be in the form of cash or cash equivalents (e.g., gift certificates).
- Business entertainment in the form of sporting or other social events with a business partner may be acceptable if the expense is moderate and in keeping with good business practices.
- If you receive a business gift that violates this policy, you must return the gift unless it would be impractical or offensive. You should also notify the business partner in such circumstances of our gift restrictions.
- Gifts to government officials are generally prohibited.
- You cannot give or receive a gift if you work in a Procurement role or in any other function or business that prohibits the exchange of business gifts.
- To avoid the perception of improper influence, no business gift should be given or received during or close to contract bids or renewals.
- If you give a business gift, ensure that it is a good use of Apotex resources and approved by your People Leader.
- Country-specific rules may apply to the giving of payments or gifts to HCPs. Marketing activities acceptable in other business sectors may be unacceptable when dealing with HCPs. Additional disclosure requirements may apply (see [Interactions with Healthcare Professionals Section](#)).


# Trade Compliance

It is Apotex's policy to comply in all respects with economic sanctions, export controls, and anti-boycott laws and regulations of Canada, the United States, European Union, the United Kingdom, the United Nations, and the jurisdictions where the Company operates.

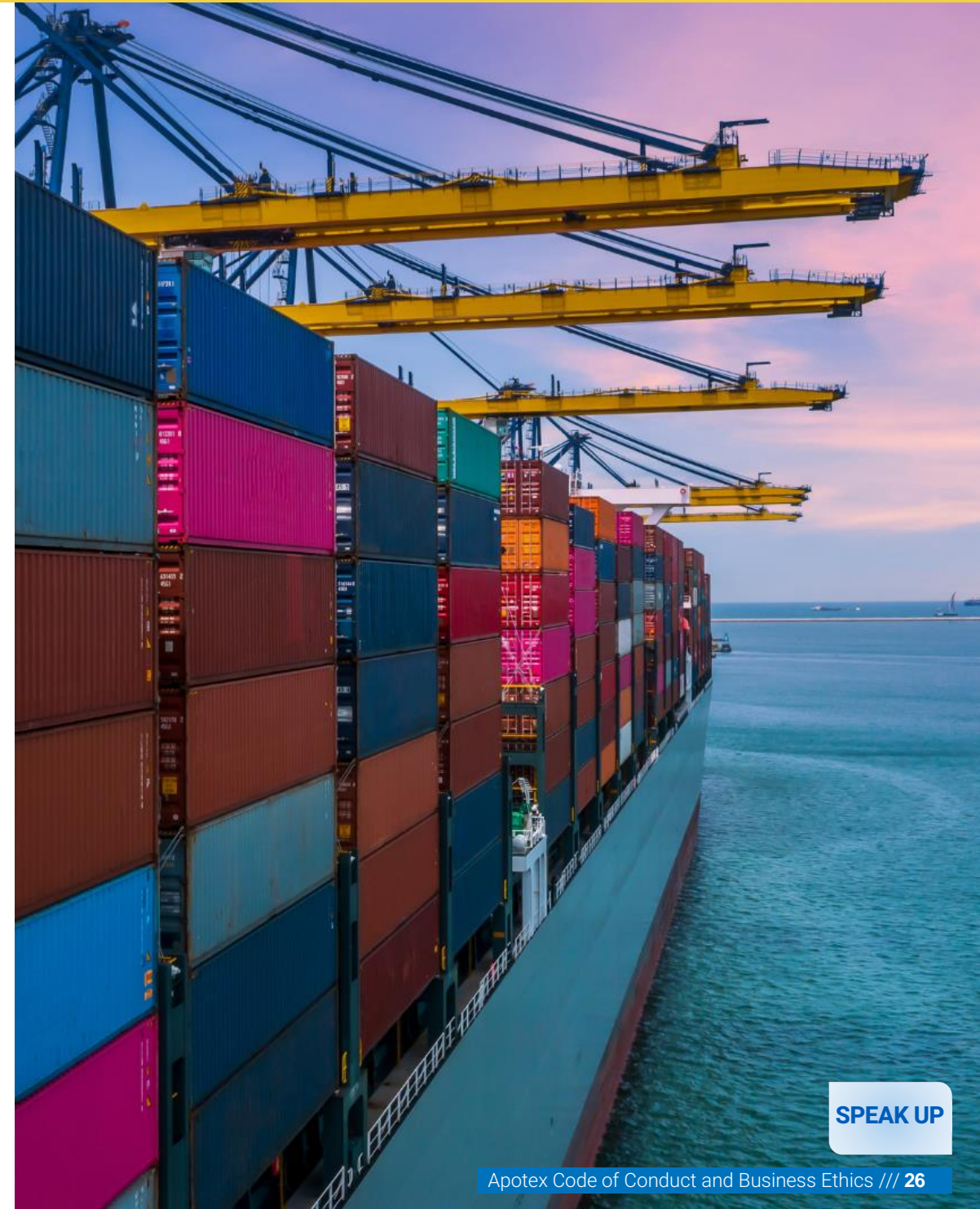
If you are involved in the transfer of goods and services (or own relationships with Third Parties who may transfer Apotex products) across international borders, you must comply with applicable import and export laws and company policies, regardless of where you are located. Canadian and/or US law may apply regardless of the local law.

Contact the Global Business Ethics and Compliance Officer and/or Global Legal to ensure your planned export and import activities fully comply with applicable laws.

Apotex mitigates sanctions through a comprehensive screening process of Third Parties that endeavours to prevent relationships with sanctioned entities.



Learn more...  
[Apotex Global Risk Compliance Policy](#), [Third-Party Due Diligence Procedure](#), and [Sanctions Target Country or Group List](#)







# OUR BUSINESS CONDUCT

OUR COMMITMENT TO OUR ACTIONS

# Conflicts of Interest

All business decisions that Apotex employees and the Apotex Board of Directors make should be in the best interest of the Company and not based on personal or other business interests. It is important to avoid even the appearance of conflicts of interest. The appearance of a conflict is what a reasonable person might view as a potential conflict.

## Is this activity a conflict of interest?

Could my personal interests or relationships influence the decisions I make?



Could it look that way to someone else?



If YES, it is probably a conflict. Seek guidance when you are not sure.



## Reporting Actual or Perceived Conflicts of Interest

Apotex requires employees to provide notice of actual or potential conflicts of interest as they arise. Provide notice to your direct manager and receive written approval from the Global Business Ethics and Compliance Officer before engaging in any activity that may invoke any conflict-of-interest situation.

Examples of potential Conflicts of Interest:

- Working for an Apotex competitor, supplier or business partner.
- Having ownership interest in a business that sells goods or services to Apotex.
- Having direct or indirect supervisory/reporting relationship between relatives or romantic partners.
- Having a family member who does, or wants to do, business with Apotex.
- Exchanging a gift, payment or favor with a business partner in exchange for an Apotex contract.
- Accepting a business opportunity for yourself that was intended to benefit Apotex.
- Serving on the board of a company that does business with Apotex.

Learn more...  
[Global Conflicts of Interest Policy](#)

**SPEAK UP**



# Importance of Business Records

## What are Business Records?

Business records include *any* document or communication in paper or electronic form that are maintained in the course of business. These records are essential to managing our business and fulfilling our legal, financial, and ethical obligations to governments and our customers.

## Maintaining Accurate Business Records

You are responsible for ensuring that the business records in your custody or control are maintained, retained, and destroyed in compliance with all legal and regulatory record keeping requirements.

When managing business records, remember to:

- Enter information in an honest and timely fashion;
- Classify and retain business records according to corporate guidance and applicable policies;
- Follow the retention periods specified in the retention schedule, if applicable, or as required by law for your sector, country or function; and
- If you receive a Legal Hold notice, no records (hard copies or electronic) may be deleted, destroyed, or altered. Destruction of documents subject to a Legal Hold even inadvertently, could expose our company and you to civil and criminal liability.

Learn more...

[Global Records Management Policy](#), [Litigation Hold](#), [Enterprise \(Non-GXP\) Record Retention and Destruction Procedure](#), and [Enterprise Master Data Management](#)



Apotex's records management requirements **apply to all employees as well as anyone we do business with**, including suppliers, contractors or any third party.

If you have any questions regarding Legal Holds, contact Global Legal or



**SPEAK UP**

# Preventing Fraud

Knowingly providing false, inaccurate or incomplete information is improper, and, in most situations, is illegal and may constitute fraud.

If you become aware of a questionable accounting or record-keeping practice or other types of fraud, you must report the concern promptly to one of the Speak Up channels available to you.



## Rigor & Discipline

“I make plans and follow processes”

## Examples of Fraud

- Misstating financial information in our company’s books and records.
- Accelerating or deferring costs in violation of generally accepted accounting principles.
- Altering GxP records in order to make production goals.
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work.
- Submitting false medical information to obtain benefits.
- Submitting false or altered expense reports for reimbursement.
- External fraud: Vendors who do wrong.
- Insider trading: Trading stocks or securities based on non-public material information that is not available to the general public.

## How to Prevent Fraud

- **Act with Integrity:** Be honest, transparent, and ethical in all interactions.
- **Report Suspicious Activity:** Speak Up if you suspect or know of any fraudulent behaviour.
- **Protect Confidential Information:** Safeguard sensitive data and assets. See Safeguarding Apotex Information section.
- **Be Accountable:** Take ownership of your actions and responsibilities.
- **Maintain Accurate Records:** Ensure accuracy and completeness of financial and operational records. See Importance of Business Records section.
- **Avoid Conflicts of Interest:** Disclose and manage personal interests that may conflict with work responsibilities. See Conflicts of Interest section.

**SPEAK UP**

# Our Commitment to Business Ethics

## Anti-Money Laundering (AML)

Money laundering refers to the act of concealing the origins of illegally obtained funds (“dirty money”) by making it appear as if it came from legitimate sources (“clean money”). Abiding to anti-money laundering laws, guidelines, and principles helps us ensure Apotex assets are not used for AML crimes or to conceal them.

### Apotex’s AML Policy

- Always ensure you are conducting business with reputable vendors and customers, for legitimate business purposes, with legitimate funds. Follow the Third-Party Due Diligence Procedure.
- To help prevent and detect money laundering and terrorist financing, check for...
  - Red flags such as suspicious payments, which may include cash or the equivalent (when cheques are the norm)
  - Payments made from personal accounts instead of business accounts
  - Funds from financial institutions or third parties without a logical relationship to the customer or business partner.
- Cash payments are prohibited unless previously approved by Global Legal and Global Business Ethics and Compliance departments.

## Our Procurement Process

To maintain integrity in the procurement process it is mandatory that all employees follow the Global Procurement Policy. Involve the Global Procurement department (GP) early in the sourcing process, to ensure that all transactions are conducted in a fair, transparent, and ethical manner, reducing the risk of conflicts of interest, fraud and non-compliance.

### Remember:

#### 1 Annual Spend with Supplier ≥ \$250K CAD

GP must be involved from the start of the project.  
GP will collaborate with business partners to determine best sourcing approach for the initiative.

#### 2 Annual Spend with Supplier < \$250K CAD

GP will provide guidance and advice to the business as needed. Competitive bids must be obtained from at least 3 different suppliers if a Preferred Supplier is not used.

#### 3 New supplier on-board process:

The process of evaluating and contracting suppliers is based on applicable legislation; Apotex’s policies and due diligence outcomes; and is conducted fairly, without conflicts of interest.

#### 4 Help Desk

Contact Buy Desk through [apobuy@apotex.com](mailto:apobuy@apotex.com) to obtaining support.

## Types of Proprietary and Confidential Information



Mergers or acquisitions



Changes in management



Financial results or forecasts



Market strategies



Legal actions



Contracts



Clinical trial or other scientific data



Corporate Assets

Learn more...  
[Safeguarding Apotex Information and Intellectual Property Policy](#)

# Safeguarding Apotex Information

Every employee (even after you leave the Company) must exercise diligence in maintaining the integrity of Apotex's proprietary and confidential information by:

- Maintaining the strict confidentiality of Apotex information entrusted to you. Do not disclose any Apotex confidential information, even to your family members, unless the disclosure is:
  - Authorized by Apotex;
  - In connection with a clear legitimate business need; and
  - Disclosed under a written confidentiality agreement, reviewed by the legal department.
- Protecting confidential electronic information (see [Use of IT Assets](#) section) by only using approved methods for sharing, collaborating, inputting or transferring confidential (i.e., non -publicly available) information, including, but not limited to, the use of Generative Artificial Intelligence (AI) tools.

## Your Rights as an Employee

Confidentiality does not restrict you from raising concerns about potential Code or legal violations to Apotex, or from filing a complaint, communicating, providing information, or participating in an investigation or proceeding before a government agency.



# Use of Corporate Assets

As team members, we are trusted to use Apotex Corporate Assets including buildings, patents, trademarks, equipment, systems and other resources with integrity, care and professionalism to advance the success of Apotex.

## Precautions and Rules Governing the Proper Use of IT Assets

IT assets include computers and information systems, phones and other electronic equipment and data.

- Always abide by the GIS Policy – Use of IT Assets.
- Ensure any third-party you engage or work with that have access to Apotex systems or data uphold our information security requirements.
- Protect company assets from loss or harm. Keep computer equipment safe and secure at all times and protect your user IDs and passwords.
- Use computer equipment, phones, email and internet access for legitimate and lawful business purposes.
- Use authorized secure methods to share confidential files externally (e.g., e-share).
- Only limited and appropriate personal use is acceptable. You are not guaranteed personal privacy on Apotex's electronic systems.
- Return your company-issued equipment immediately when requested.



Contact [GIS Privacy and Security](#) if you have any questions about the use of IT Assets and immediately if you suspect or become aware of a situation where Apotex IT assets or data may have been compromised or lost. Contact Corporate Security in the event of missing or stolen physical assets.

Learn more...  
[Use of IT Assets](#), [Local Company Property \(Physical Assets\)](#), [Intellectual Property \(Invention\) Ownership](#), and [Safeguarding Apotex Information](#) policies

**SPEAK UP**

Learn more...  
[Global](#) and [Regional](#)  
[Data Privacy](#)  
[Policies](#)

# Data Privacy

Apotex may collect personal identifiable information (PII) from many different individuals, including customers, patients, clinical trial subjects, healthcare professionals and employees.

## What is PII?

The definition of PII varies by country, but generally encompasses any personal identifying information (e.g., name, birth date, gender, address, health card number, etc.) and sensitive identifying information (e.g., religion, race, health status, marital status, telephone number, social security number, credit card number, etc.).



Know local data privacy laws when handling PII. Contact Global Legal or GIS Privacy and Security for more information.



Collect PII only for legitimate business purposes and use it only for those purposes. Retain as per corporate retention policies and schedules.



Ensure data is protected at each stage – collection, processing, storing and transferring.



Obtain written consent before collecting, using or disclosing PII.



Share PII only when there is a legitimate need, and it will be protected by the other party. External third-parties must have a written confidentiality agreement, and, where required by applicable law, data processing agreements.






Contact Global Service Desk immediately if there is a potential breach of PII, or if you have any questions regarding data privacy.

# Public Communications & Social Media

Learn more...  
[Global Corporate Communications and Social Media Policy](#)

Apotex needs a clear and consistent voice when providing information to the public – including the media – relating to Apotex business plans and operations. For this reason, it is important that only authorized Apotex personnel speak on behalf of Apotex. It is important that you follow these guidelines and know who to contact in order to protect the Company and its reputation.

COMMUNICATION TYPE	WHAT YOU NEED TO KNOW	WHO TO CONTACT
 <p>The Media</p>	<ul style="list-style-type: none"> <li>– Do not provide Apotex information to the media, including journalists, investors or market analysts.</li> </ul>	<p>Immediately forward requests for Apotex Information to Media Relations at <a href="mailto:media@apotex.com">media@apotex.com</a></p>
 <p>Public Speaking</p>	<ul style="list-style-type: none"> <li>– Get authorization before speaking on behalf of Apotex or expressing an official Company position on a public platform or event. This includes, but is not limited to, interviews or external speaking engagements, in a personal or business capacity, in which Apotex will be discussed or referenced, or published in any media or written content.</li> <li>– Knowledge sharing related to your role at Apotex will also require authorization.</li> </ul>	<p>Get written approval from your People Leader and/or division VP and submit to <a href="mailto:corporatecomms@apotex.com">corporatecomms@apotex.com</a> for approval.</p>
 <p>Online Communication</p>	<ul style="list-style-type: none"> <li>– Ensure your online conduct is aligned with Our Code. Know and follow the Safeguarding Apotex Information and Use of IT Assets policies.</li> <li>– Do not share confidential Apotex information.</li> <li>– Identify yourself. If you are commenting or publishing on topics related to your job, identify yourself as an Apotex employee.</li> <li>– Do not speak on behalf of Apotex without authorization.</li> <li>– Seek guidance from HR before recommending colleagues (current or past) on LinkedIn.</li> <li>– Do not use Apotex’s logo or trademarks without written authorization.</li> </ul>	<p>If you see comments or posts online that you believe are inaccurate or unfairly represent Apotex, do not respond. Immediately report to <a href="mailto:corporatecomms@apotex.com">corporatecomms@apotex.com</a></p>

**APOTEX**

Canadian-Based  
Global Health Company



# CODE OF CONDUCT AND BUSINESS ETHICS

Our Code is Our Culture

# APOTEX

APOTEX CODE OF CONDUCT AND BUSINESS ETHICS

The information herein supersedes any previously published Apotex Code of Conduct and Business Ethics.

This Code of Conduct does not constitute a contract, guarantee of employment for any period, or create any specific employment rights.

The online version of the Apotex Code of Conduct and Business Ethics, accessible on APOweb, supersedes all published versions.

Apotex Code of Conduct and Business Ethics Version 8.0  
October 15, 2024

The code can be found electronically at  
External Site: <https://www.apotex.com/global/ethics>  
Internal Site: [PolicyHub](#)