

# CODE OF CONDUCT AND BUSINESS ETHICS

Our code is our culture

# Contents

## A MESSAGE FROM OUR CEO

## OUR CODE

Our Purpose, Winning Behaviours & Values

Who is Accountable for Our Code?

How to Show Individual Accountability

## OUR VOICE

Speak Up

Speak Up Channels

APOspeaks

## OUR WORKPLACE

Working Together

EHS in the Workplace

Refraining from Substance Abuse

Sustainability

## OUR MARKETPLACE

Product Safety

Quality Standards

Interactions with Healthcare Professionals

03

04

05

06

07

08

09

10

11

12

13

14

15

16

17

18

19

20

Product Communications

Interactions with Business Partners

Interactions with Competitors

Anti-Corruption

Business Gifts

Trade Compliance

## OUR BUSINESS CONDUCT

Conflicts of Interest

Preventing Fraud

Our Commitment to Business Ethics

Insider Trading

Importance of Business Records

Safeguarding Apotex Information

Use of Corporate Assets & Opportunities

Personal Information & Privacy

Public Communications & Social Media

21

22

23

24

26

27

28

29

30

31

32

33

34

35

36

37





## A MESSAGE FROM ALLAN OBERMAN

At Apotex, we are *A Force For Health*. We advance health with relentless determination, deliver access with uncompromising quality, unlock new possibilities for millions around the world through partnership, and in all that we do, rally as one team to strengthen health.

Over our 50-year history, we have established a position of invaluable trust within the global healthcare community, which 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.

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.

**Rigour and discipline:** Rigour and discipline encourages us to make plans and deliver results. 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.

A handwritten signature in black ink, consisting of stylized initials and a long horizontal stroke.

**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."



### Rigour & Discipline

"I make plans and deliver results."



### Continuous Improvement

"I always do better."

## Our values



### Integrity

We do the right thing, every time.



### Teamwork

We achieve more together.



### Courage

We face challenges head on.



### Innovation

We power progress with bold ideas.

# 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. The Board is also responsible for monitoring compliance with the Code and may, from time to time, amend 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
  - 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, and all individuals subject to the Code must comply, 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

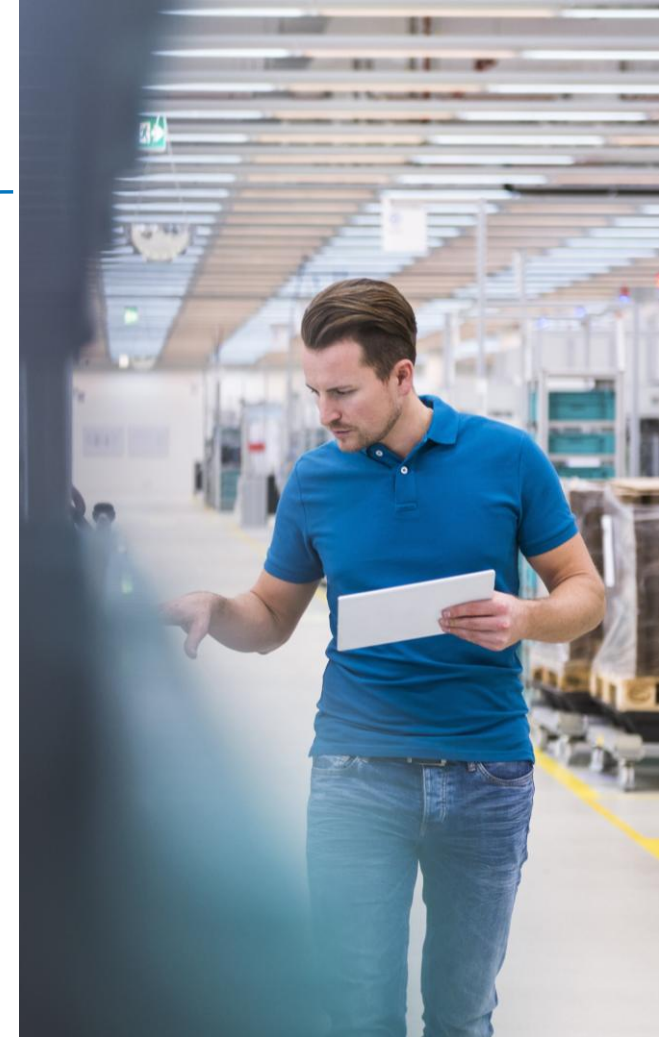
Do not take shortcuts  
that will compromise  
doing business ethically

Seek guidance

Lead by example

### Learn more...

- [Policy Hub](#)
- [Document Collections](#)



# 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

[Speak Up!](#)



# SPEAK UP.

Your voice matters. We're listening.

# 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 without fear of retaliation when suspected compliance issues arise.

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)

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- ☒ Raises a compliance question or seeks advice about a particular business practice, decision or action

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- ☒ Cooperates in an investigation of an actual or suspected violation



## Did you know?

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](#)

# SPEAK UP CHANNELS

| Channel                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Contact                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>People Leader</b></p> <p>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><li>▪ <a href="mailto:AskHR@apotex.com">AskHR@apotex.com</a></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>GIS Information Security</b></p> <p>Contact GIS Information 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="mailto:gissecurity@apotex.com">gissecurity@apotex.com</a></li></ul>                                                                                                                                             |

# 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.

## Our Investigation Procedure

- Employees who may have knowledge about the alleged incident(s) will be contacted.  
[All employees must cooperate fully with an inquiry or investigation and maintain confidentiality.](#)
- 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.



[APOspeaks.com](https://www.apospeaks.com)

### Learn more...

- [Global Speaking Up](#)

# OUR WORKPLACE

Fair and equitable treatment of our employees



# 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. Please refer to the regional harassment and discrimination policies that apply to your jurisdiction of employment for further guidance.



## 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.



## 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. Please refer to the regional harassment and discrimination policies that apply to your jurisdiction of employment for further guidance.



### Learn more...

- [Regional Harassment Policies](#)

# ENVIRONMENT, HEALTH AND SAFETY (EHS) IN THE WORKPLACE

All employees have an obligation to each other and our patients to ensure work conditions meet our EHS standards.

## Our commitment to EHS is grounded in the following core beliefs:

- We believe that all accidents can and must be prevented.
- We believe that everyone is responsible for their own safety as well as the safety of others.
- We prioritize EHS objectives and targets to reduce EHS risks and eliminate hazards.
- We believe that compliance with EHS Legislation is important.
- We believe in providing safe and healthy working conditions that are free from violence and harassment.
- We believe in conducting our business in an environmentally responsible manner.

## In keeping with this commitment, we require our employees, contractors and visitors to:

- Complete a pre-job risk assessment and safety discussion appropriate for the level of risk before beginning work.
- Immediately report **all incidents** to your People Leader.
- Always be trained and competent in the work that we conduct.
- Follow Standard Working Procedures, including safe work and environmental protection practices, at all times.
- Apply Hazardous Energy Controls (Lockout/Tagout Procedures) before any interaction with live equipment and/or systems.
- Never remove or override safety devices unless a task specific Lockout Exemption Form has been obtained.
- Obtain an appropriate “permit to work” before work that involves confined space entry, work on energy systems, excavations or hot work in potentially explosive environments.
- Use fixed platform or fall protection equipment when working at heights.
- Wear Personal Protection Equipment (PPE) meeting site requirements, whenever mandated.

## Reporting Concerns

Unsafe work does not belong here! We are all obliged to stop unsafe work and report it to leadership to ensure we proactively avoid accidents and incidents!

- **Employees: immediately** notify your direct People Leader if you become aware of a potential or actual EHS hazard or concern.
- **People Leaders: must** report all incidents according to both site and Global EHS standards.

## Learn more...

- [EHS](#)



## REFRAINING FROM SUBSTANCE ABUSE

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).

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- ☒ Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working or on the premises.

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- ☒ Working while impaired: due to a condition and/or substance that impacts the ability to work safely.

**Learn more...**

- [Substance Use and Abuse](#)

# SUSTAINABILITY

Rooted in our Winning Behaviours, we are committed to supporting patients at every stage of their health journeys. These behaviours drive our dedication to advancing healthcare solutions while fostering a positive impact on the environment and society.

We strive to strengthen communities and drive meaningful social impact. Patients remain at the centre of our efforts, inspiring our collaborations with the healthcare community to create tailored support programs and develop products that address unmet needs.

## Environment

As part of our commitment to health and resilience, we seek to enhance efficiency and reduce our environmental footprint. Our robust EHS management system ensures regulatory compliance and enhances efficient management of waste and water resources.

## Social

- **Health and safety:** EHS principles shape our everyday decisions.
- **Talent attraction, retention, & development:** We work to empower all stakeholders to advance our shared journey of health.
- **Supplier engagement:** We are committed to understanding our entire footprint and recognize the importance of comprehensively assessing our value chain and sourcing process.
- **Corporate citizenship:** We support our community through corporate giving, partnerships with local organizations, and volunteer opportunities for our employees.

## Governance

- Our **corporate governance** structure is designed to ensure accountability for Apotex's performance and its future impacts.
- We conduct **business with integrity**.



## Learn more...

- [Apotex Sustainability Report](#)

# OUR MARKETPLACE

Fair dealing

## Our responsibility

Each of us is accountable to deal fairly with Apotex's stakeholders, customers, suppliers, competitors and employees. Unfair advantage should not be taken of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.



# PRODUCT SAFETY

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:

**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).

- ☒ Name of the reporter (contact information is highly desirable)
- ☒ Adverse event term
- ☒ Patient information (at least one demographic parameter)
- ☒ Suspected Apotex product



# RESEARCH AND DEVELOPMENT

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

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

# 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.



## 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.



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

### Learn more...

- [Quality Policies and Procedures](#)

# INTERACTIONS WITH HEALTHCARE PROFESSIONALS (HCPS)

Apotex employees must not violate country-specific 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 laws, applicable industry association codes and Apotex policies. Violations may result in severe corporate or individual penalties including significant fines, imprisonment, and other negative consequences.

## 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 fair market value and for legitimate business purposes (e.g., for bona fide research or consultancy).
- ☒ Ensure country-specific rules applying to marketing activities, payments, and gifts to HCPs are followed.
- ☒ Contact Global Business Ethics and Compliance when you make a payment to an HCP, Healthcare Organization, or Patient Association.

**Learn more about interactions with HCPs – policies for:**

- [Canada](#)
- [United States](#)
- [Middle East](#)
- [LATAM](#)

# PRODUCT COMMUNICATIONS

✓ Product communications must be truthful, balanced and accurate, and in accordance with applicable laws.

✓ 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 for off-label information about Apotex products.

✓ Ensure third parties who distribute Apotex products are aware of their compliance obligations.

**If you receive a request for medical information, please 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 complaint, contact Customer Service at:**

**Website:** [Contact Customer Service](#)

**Phone:** 1-877-427-6839

**Fax:** 1-800-665-2854

**Business Hours:** Monday to Friday from 8:00 a.m. to 6:00 p.m. (EST).



**Learn more...**

- [Regional Promotional Material Review](#)

# INTERACTIONS WITH BUSINESS PARTNERS

Apotex establishes business partnerships (such as with suppliers and wholesalers) only after thoroughly reviewing their background and qualifications. Ensure your selection criteria prioritize quality and integrity, complete required risk assessments, and document all contractual obligations clearly.

## To the extent possible, your due diligence should include:

- ☒ Ensuring business partners who will represent Apotex know their obligations to follow applicable laws 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 risk assessments—covering areas such as procurement, cybersecurity, data privacy, anti-corruption, and sanctions—in accordance with corporate procedures prior to engagement.
- ☒ 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...

- [Global Procurement](#)
- [Supplier Code of Conduct](#)
- [Third-Party Due Diligence](#)



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 Global Legal to determine the proper course of action.

### Learn more...

- [Global Competition Law](#)

## 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.

# 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.

## Examples of bribes



Cash



Sponsorships



Gifts



Job offers



Hospitality (travel, meals, and entertainment)



Anything of value for the recipient (including their immediate family members)



Donations, including political donations



### Learn more...

- [Global Risk Compliance](#)

(includes our policy on gifts and hospitality)

# 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 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...

- [Global Risk Compliance](#)
- [Third-Party Due Diligence](#)
- [Global Lobbying & Political Contributions](#)

# 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 policies of the business partner.

Business gifts are intended to build goodwill and strengthen relationships with customers, suppliers and business partners, not to gain an 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 consistent 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. If you cannot return it, then you must provide it to your manager and advise Global Business Ethics and Compliance. You should also notify the business partner in such circumstances of our gift restrictions.
- Gifts to government officials are generally prohibited.
- You may not 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 may be given or received during or close to procurement processes including but not limited to contract bids or renewals.
- If you give a business gift, ensure that it is a good use of Apotex resources, approved by your People Leader and accurately recorded in the company's books and records.
- 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](#)).

## What are business gifts?

Anything of value (including business entertainment, meals 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](#)
- [Global Conflicts of Interest](#)



## Learn more...

- [Global Risk Compliance](#)
- [Third-Party Due Diligence](#)
- [Sanctions Target Country or Group List](#)

## TRADE COMPLIANCE

It is Apotex's policy to comply in all respects with applicable economic sanctions, export controls, and anti-boycott laws.

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 whether you are outside the country in which you reside.

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

Apotex mitigates sanctions and other compliance risks through a comprehensive due diligence screening process of Third Parties that endeavours to prevent relationships with sanctioned entities or entities domiciled in or doing business in sanctioned countries.

# OUR BUSINESS CONDUCT

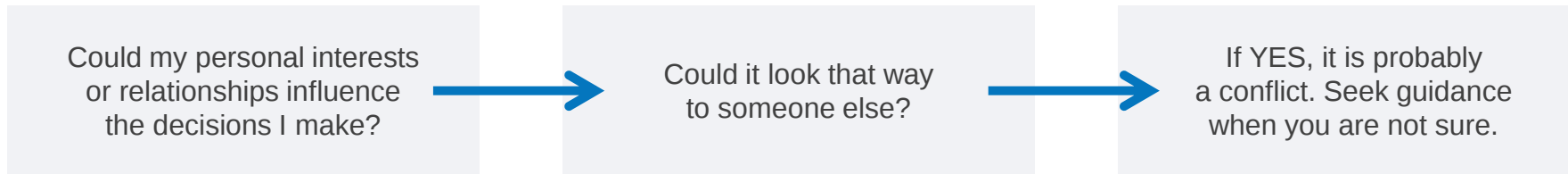
Our commitment to our actions



# CONFLICTS OF INTEREST

All business decisions that Apotex employees and the 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?



## Reporting Actual or Perceived Conflicts of Interest

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

Do you have any actual or potential conflicts of interest to disclose?

[Please report here](#)

## 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 a 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](#)

# PREVENTING FRAUD

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

## 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: Third parties who do wrong

## 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.



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.

[Speak Up!](#)

# OUR COMMITMENT TO BUSINESS ETHICS

## 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.

## Anti-Money Laundering

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 by anti-money laundering laws, guidelines, and principles helps us ensure Apotex assets are not used for money laundering.

## Our Policy

- Always ensure you are conducting business with reputable third parties and customers, for legitimate business purposes, with legitimate funds. Follow the Third-Party Due Diligence Procedure.
- To help prevent and detect money laundering, 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.

## Remember:

### 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.

### 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.

### 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.

### Help Desk

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

# INSIDER TRADING

## What is Insider Trading?

- **Insider trading** is the buying or selling of a company's stocks or other securities by someone who has access to **material non-public information** (MNPI) about the company.
- In simpler terms:
  - It's when someone uses MNPI to make a profit or avoid a loss in the stock market before that information is made public.
- This practice is **illegal, unethical and would harm investors, employees and our reputation**.
- Insider trading restrictions apply not only to employees but extend to persons in a special relationship with the company, including our family members, and members of our households or other people or entities aware of MNPI.
- Insider trading restrictions also apply to other companies that you have MNPI about.

## What is MNPI?

- **"Inside" information that has not been widely disseminated to the public and is information that a reasonable investor would consider important in making a decision to buy, sell or hold a stock or other securities.**
- Examples include information about:
  - Major reorganizations, amalgamations, or mergers
  - The public or private sale of additional securities
  - Unexpected changes in the financial results for any period
  - Any development that affects the Company's assets, products or markets
  - A significant change in capital investment plans or corporate objectives
  - Significant new contracts, products, patents, or services or significant losses of contracts or business
  - Significant acquisitions or dispositions of assets, property or joint venture interests
  - Significant litigation

## What is tipping?

- **Insider trading includes "tipping" which occurs when:**
  - An insider (e.g., an employee or director) shares MNPI with someone else (the tippee).
  - The tippee uses that information to buy or sell securities or passes it on to others who do.



## Protect yourself

If you are unsure if information is MNPI, treat it like it is, and ask Global Legal before disclosing it or purchasing or selling securities. Remember you need permission to speak on behalf of Apotex.

# IMPORTANCE OF BUSINESS RECORDS

## What are Business Records?

Business records include **any** document or communication in paper or electronic form that are made or 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 applicable legal and regulatory record keeping requirements.

When managing business records, remember to:

- Enter information in an honest and timely fashion.
- Classify, protect, 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.
- 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.

If you have any questions regarding Legal Holds, contact Global Legal or [Speak Up](#)

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

## Learn more...

- [Global Records Management](#)
- [Litigation Hold](#)
- [Enterprise \(Non-GXP\) Record Retention and Destruction](#)
- [Safeguarding Apotex Information](#)

# SAFEGUARDING APOTEX INFORMATION

Every employee (even after you leave the Company) must exercise diligence in maintaining the confidentiality, integrity and availability of Apotex’s information to manage our business and meet our regulatory and legislative obligations.

Your role is to ensure that you manage and protect Apotex information (paper and electronic) based on its level of sensitivity and the required data protection controls in your day-to-day activities and interactions with internal and external parties.

## Types of Proprietary and Confidential Information

- |                                                                                                                            |                                                                                                         |                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
|  Mergers or acquisitions                   |  Changes in management |  Regulatory status |
|  Financial results or forecasts            |  Market strategies     |  Pipeline          |
|  Legal actions                             |  Contracts             |  Supply status     |
|  Clinical trial or other scientific data |  Corporate assets    |                                                                                                       |



## 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.

### Learn more...

- [Safeguarding Apotex Information](#)
- [Intellectual Property](#)
- [Use of IT Assets](#)

# USE OF CORPORATE ASSETS & OPPORTUNITIES

As team members, we are trusted to protect and properly use Apotex Corporate Assets including buildings, intellectual property such as patents or trademarks, equipment, systems and other resources with integrity, care and professionalism to advance the success of Apotex and for legitimate business purposes and not for personal gain. We have a duty to advance Apotex's interests when possible. Individuals subject to the Code must not personally (or for friends or family) take opportunities discovered through company assets, property, information, or position.

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

IT assets include data, services, and physical assets such as computers and information systems, phones and other electronic equipment and data.

- Always abide by the GIS Policy – Use of IT Assets.
- Contact GIS before engaging or working with any third party that may require access or connection to Apotex systems or data to ensure that you uphold our information protection and security requirements.
- Ensure any third party you engage or work with that has access to Apotex systems or data upholds 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.
- 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.

## Artificial Intelligence

When we leverage AI in our work, we do so ethically and responsibly, consistent with our Code and corporate policies.

Contact [GIS Information Security](#) or [Global Business Ethics and Compliance](#) 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](#)
- [Safeguarding Apotex Information](#)
- [Artificial Intelligence Use](#)

# PERSONAL INFORMATION & PRIVACY

Apotex may collect Personal Information (PI), Personally Identifiable Information (PII), Sensitive Personal Information (SPI) and Protected Health Information (PHI) from various individuals, including customers, patients, clinical trial participants, healthcare professionals, and employees.



Know local data privacy laws or seek guidance before handling PII.



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 – in compliance with applicable laws and regulations, including consent where required.



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. Third parties must have a written confidentiality agreement, and, where required by applicable law, data processing agreements.



Contact Global Service Desk and [privacy@apotex.com](mailto:privacy@apotex.com) immediately if there is a potential breach of PII.



Contact Global Legal or Global Business Ethics and Compliance ([privacy@apotex.com](mailto:privacy@apotex.com)) if you have any questions regarding data privacy legislation or procedures.

Apotex is committed to protecting all forms of personal and sensitive information in accordance with applicable privacy laws and regulations

## What is PII and SPI?

Personally Identifiable Information (PII) refers to any data that can be used to identify an individual. This includes, but is not limited to:

- Name, Birth date, Gender, Address, Health card number

Sensitive Personal Information (SPI) is a subset of PII that includes more sensitive data which, if disclosed, could result in significant harm or risk. Examples include:

- PHI (e.g., medical records, health status), Religion, Race, Marital status, Telephone number, Social Security number, Credit card number

## Learn more...

- [Global Privacy](#)
- [Regional Data Privacy Policies](#)

# PUBLIC COMMUNICATIONS & SOCIAL MEDIA

Apotex needs a clear and consistent voice when providing information to the public – including the media. For this reason, it is important that only authorized Apotex personnel speak publicly 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                                                                                                                                                                                                     |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Media            | <ul style="list-style-type: none"><li>Do not provide Apotex information to the media, including journalists, investors or market analysts.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Immediately forward requests for Apotex Information to Media Relations at <a href="mailto:media@apotex.com">media@apotex.com</a>                                                                                   |
| Public Speaking      | <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>                                                                                                                                | 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.                                               |
| Online Communication | <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> | 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> . |



Learn more...

- [Global Corporate Communications and Social Media](#)

# CODE OF CONDUCT AND BUSINESS ETHICS

Our code is our culture

## 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 9.0  
September 2, 2025

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

**APOTEX**