Dear Colleagues,

Zuellig Pharma’s rich business tradition in Asia, fostered over decades of service to our partners and healthcare stakeholders, is built on the unwavering integrity of our employees. Our important role in society’s healthcare supply chain demands that we uphold the highest ethical standards in all aspects of our business.

Our commitment to these standards is a fundamental ingredient of our business success, and the cornerstone of our unrivalled reputation for trust, transparency and service quality. This reputation is our company’s single most valuable asset, and we can only protect it through the strict ethical behavior of each and every employee.

Preserving and perpetuating our corporate legacy depends on what we do and how we do it, every single day. We can only ensure the future growth of this great organization through the commitment of our people to take personal responsibility to understand our values, policies and procedures, and to live and breathe them every day.

This Code of Conduct provides essential guidelines to help you understand your responsibilities, including your obligations to comply with the law and to advise Zuellig Pharma management of anything that does not comply with the law or this Code. If we continue to uphold these high standards of conduct, our customers and multinational suppliers, as well as governments, service suppliers, shareholders, partners, and others, will continue to reward us with their confidence and trust.

Leadership is about taking a stand and demonstrating commitment through individual behavior. I urge each and every one of you to join me in leading our company and our industry in setting the standard for the future.

John Davison
Chief Executive Officer
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This Code reflects our commitment to being a good corporate citizen and conducting our business affairs in an ethical manner. That goal cannot be achieved unless each of you individually accept responsibility to promote honesty and integrity. Any activity that calls into question our reputation must be avoided. This Code establishes what we expect from you.

We cannot anticipate every situation that may create an ethical issue, and understand that not every situation is black and white. The key to compliance with the Code is exercising good judgment. This means following the spirit of this Code and the law, doing the “right” thing and acting ethically when the law is not specific.

In our mission to “be the trusted partner that helps healthcare companies realize opportunities in Asian markets through innovative & high-impact solutions”, it is important to remember the core values that provide a foundation for the way we do business: Integrity & Trust, Collaboration, Passion for Excellence, Innovation and Personal Growth. Built upon unwavering integrity, trust is the essence of Zuellig Pharma’s history. We must uphold our integrity and the trust placed in us in all actions we take.

We are a large company, operating in various cultural, political, and economic environments. There are a number of pressures that push us to excel. While meeting goals and expectations are very important, they must always be accomplished within our values framework.

This Code outlines the broad principles of legal and ethical business conduct under which we do business. The Code may be supplemented, but not replaced by more detailed policies and procedures. Every person who represents Zuellig Pharma, its affiliates and subsidiaries, is expected to understand and comply with the provisions of this Code.

Violations of this Code, including failures to report potential violations, will not be tolerated and will be viewed as a disciplinary matter that may result in action, including termination of employment.

Question
This Code covers more areas than my local policies and procedures. In some cases, my local policies and procedure are more detailed. Is this ok?

Answer
This Code is designed to outline our broad principles of business conduct. Your local policies and procedures should be consistent with this Code, therefore, you can follow both. If you have any questions you should discuss them with your manager or HR.
This Code of Conduct provides essential guidelines you need in order to understand your responsibilities, including your obligation to comply with the law and to advise Zuellig Pharma management of anything that is not in compliance with the law or this Code.

**Who does this apply to?**

The Code applies to all Interpharma Investment Ltd (the holding company for all Zuellig Pharma entities) subsidiaries/divisions, and includes full-time, part-time, contract and temporary employees. It applies while working on our premises, at offsite locations where our business is being conducted, at Company-sponsored business and social events or at any other place where you are a representative of the Company.

**It is everybody’s responsibility to:**

- Understand this Code.
- Conduct all Zuellig Pharma business in compliance with applicable laws and regulations and Company policies, including this Code.
- Take breaches of the law or this Code seriously and always report them.
- Avoid compromising our integrity to achieve goals.
- Ask questions or seek guidance from their managers when in doubt.

Managers set an example for other employees and are often responsible for directing the actions of others. Every manager is expected to take the necessary actions to ensure compliance with this Code, to provide guidance and assist employees in resolving questions on the Code, and to encourage employees to express any concerns regarding compliance with this Code.

**Resolving difficult issues:**

At times, you may face an issue you have difficulty resolving. Ask yourself these questions about how you plan to resolve it:

- Is it ethical and legal?
- Is it consistent with our policies and this Code?
- Is it consistent with our mission and values?
- Can I explain this to my family and friends?
- How would I feel if it was published in the news?

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**Question**

The law in my country permits me to do something but the Code does not. What should I do?

**Answer**

We fully recognize that laws vary from country to country and require employees and anyone representing Zuellig Pharma to comply with all local laws. However, to the extent the Code includes higher standards, we require adherence to those standards.
How do I know what laws and regulations I need to know about?

You should talk to your manager about the laws and regulations that apply to your job. Also, you should talk to HR to make sure there are no other laws or regulations you need to follow.

Always ask questions if you are unsure about complying with the Law and any other legal requirements.
Occasionally something may occur that causes conflict between your interests and those of Zuellig Pharma. It is important for you to understand situations where this can happen and how to deal with them.

You are expected to avoid situations that may conflict with the interests of Zuellig Pharma. A conflict of interest can occur when your personal interests interfere in any way, or even appear to interfere, with the interests of Zuellig Pharma. In other words, you must not take advantage of your employment with Zuellig Pharma for personal gain, or take any actions or have any interests that make it difficult for you to perform your work objectively and effectively, or that interfere with your judgment in the course of your job.

If you think you may have a conflict, actual or potential, you must always discuss the details with your manager. Remember to always report a potential conflict of interest to your manager or HR and get any necessary approvals. We will work together with you to address the conflict and your concerns.

### Examples of Potential Conflicts of Interest:

<table>
<thead>
<tr>
<th>Type of Conflict</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Investments</strong></td>
<td>Holding an investment (directly or indirectly) in a competitor, supplier, customer, distributor, client or other company that does business with Zuellig Pharma that would appear to impair your judgement of what is in Zuellig Pharma’s best interest.</td>
</tr>
<tr>
<td><strong>Other Employment/Services</strong></td>
<td>Being employed, providing services to or representing a competitor, supplier, customer, distributor, client or other company that does or has the potential to do business with Zuellig Pharma.</td>
</tr>
<tr>
<td><strong>Zuellig Pharma Business Opportunities</strong></td>
<td>Taking advantage of any business opportunity and competing with Zuellig Pharma by providing services, purchasing or selling any property or diverting from Zuellig Pharma any business opportunity in which Zuellig Pharma has or is likely to have an interest.</td>
</tr>
<tr>
<td><strong>Use of Zuellig Pharma Assets</strong></td>
<td>Using Zuellig Pharma monies, facilities, equipment, know how or personnel for any other business or personal endeavours.</td>
</tr>
<tr>
<td><strong>Gifts/Entertainment/Things of Value</strong></td>
<td>Accepting (directly or indirectly) anything of value from a competitor, supplier, customer, distributor, client or other company – particularly where the purpose is (or could appear to be) to improperly influence a business decision or relationship.</td>
</tr>
<tr>
<td><strong>Personal Relationships</strong></td>
<td>Conducting business with any competitor, supplier, customer, distributor, client or other company that is owned or controlled by a relative, family member or close friend. Also, hiring a relative, family member or close friend.</td>
</tr>
</tbody>
</table>

### Question

My sister is a part owner of a packaging material company bidding for Zuellig Pharma’s business. Is this ok?

### Answer

Your sister’s company may bid for our business. However, you must disclose this relationship to your manager and not be involved in the bidding selection process.
In order to maintain our ethical standards and meet our obligations relating to anti-corruption laws, Zuellig Pharma must ensure that gifts, entertainment and other benefits are not given or received to inappropriately influence our interactions with third parties.

You must never give, request or accept anything of value which might influence (or even appear to influence) the bona fide business relationship between you and another party.

We recognize that giving and receiving gifts and entertainment are often a common business or cultural practice intended to strengthen and build long term relationships. Accepting or giving common courtesies (such as an occasional and inexpensive business meal or non monetary gift of a nominal value) to or from customers, clients, suppliers, sub-contractors and other parties you do business with is permitted in certain situations.

**All gifts and entertainment must be:**

- Reasonable in value
- Infrequent in nature
- Transparent and open
- Not given to influence or obtain an unfair advantage
- Respectful and customary

However, money or cash equivalents (e.g. gift cards, certificates and coupons) should never be given or received.

Corruption is illegal and subject to criminal penalties in most countries. You may not give any bribes, kickbacks or other benefits to any person or company to attract or retain business.

These guidelines apply to both commercial, government and state-owned enterprise relationships. Relationships with government always require special consideration and care, so ensure that you understand your responsibilities.

Fees, commissions and other amounts paid to outside consultants, agents or other third parties must never be used with the intent to circumvent these guidelines.

Contact your manager if you have any questions or concerns about a gift, entertainment or other benefit, or this guideline.

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**Question**

A supplier has offered to host my team at a sporting event. The tickets cost at least US$150 each. The total value of the event will be over US$10,000. Can I accept the offer?

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**Answer**

While social events with customers and suppliers represent valuable relationship building opportunities, you must not allow gifts and entertainment to influence your business judgment. You should politely decline unless you have the necessary approval.
It is important to ensure our interactions with government are open, transparent and do not violate anti-corruption laws. This Code outlines our approach to dealing with government officials and employees.

Because of the nature of our business, our employees come into regular contact with various government agencies and state-owned enterprises. We value our excellent relationships with government and will work fairly and honestly with them. Dealing with government officials or healthcare professionals always requires special consideration and care — particularly when you are giving or receiving gifts and entertainment. Therefore, you are required to understand what you can or cannot do under the Gifts, Entertainment & Other Benefits section of this Code.

Dealing with Government Officials

You must never make any payment or provide any other thing of value (including gifts, entertainment, or promises or offers to provide anything of value) directly or indirectly to a government official for the purpose of obtaining or retaining business or securing an improper advantage.

You must also never make any facilitation payments to government officials or employees to expedite routine government actions they are already bound to perform, e.g. processing papers. These are also known as “grease” payments.

Examples of Government Officials:

- Any official or employee of a government hospital or government healthcare institution (e.g. procurement officer)
- Any official or employee of a government agency or regulatory authority (e.g. customs, tax, local Food and Drug Administration, etc.)
- Any political candidate or member of a political party.
- Any government official acting in that capacity for a commercial enterprise.

Why is this important?

It is Company policy to comply with all applicable laws and regulations on contact and dealings with government officials and to adhere to high ethical, moral and legal standards.

Never:

- Improperly record any payments to government agencies.
- Use third parties, consultants or agents to accomplish what we cannot do legally or properly.

Question

I have a relative at a government hospital who can help us win a tender for one of our clients. He says he can help “informally” influence the Hospital Tender Committee and does not want anything in return. Is this ok?

Answer

Zuellig Pharma conducts business with integrity, fairness, and transparency. You should politely refuse your relative’s offer as it may appear to involve improper influencing of government officials.

“Always exercise the highest ethical, moral, and legal standards when dealing with government employees, customers and officials.”
To ensure we provide value, invest effectively, and do not make political or charitable contributions to gain improper advantages, this Code provides guidance on how these types of contributions should be made.

Zuellig Pharma is committed to making a positive contribution in the communities where we do business. It can be very rewarding to participate in the civic life of your community, and we encourage you to do so. As part of that commitment, we maintain a corporate philanthropy program to support organizations and activities in those communities. We do not, however, support political candidates or parties, religious or fraternal organizations.

**Political Donations**

No Company funds or services can be paid or furnished to any political party or any candidate for public office without pre-approval. Although employees are permitted to make personal contributions, the Company will not reimburse you for your own contributions.

**Charities**

We support many charities with the aim of positively impacting the health and livelihood of people around Asia. All donations must be transparent and approved to ensure that our donations are given in a clear and open manner to those that need them most.

**Always Remember:**

- All political and charitable donations must be pre-approved.
- Never allow Company's funds, property, facilities, or employee time to be used for, or be contributed to political campaigns or political practices under any circumstances.
- You should always be careful when you are asked to make a political or charitable contributions, particularly when it is part of a business transaction.

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**Question**

Can I raise money at work for a political party?

**Answer**

Generally, volunteering to work on a political campaign in your own capacity is allowed. However, you cannot conduct political activities, such as fund raising, at work.
There are serious consequences for breaching competition laws, as well as damage to our reputation when we compete for business unfairly. It is essential that everyone understands how to behave when conducting Zuellig Pharma business.

Competition laws prohibit business practices that interfere with free and open competition and can involve competitors, suppliers, distributors or customers. The Company is committed to obeying both the letter and spirit of these laws. We always will lawfully compete in the marketplace and our commitment extends to the rights of our competitors, our customers and the community.

These laws are complex and vary considerably from country to country. If you have any questions, you should always ask your manager.

**Always remember:**
- Never discuss with a competitor our trade terms on pricing, discounts, payments or collections.
- Never restrict a customer from buying one product on the condition they must buy another. They must have the right to buy them separately.
- Never divide up markets, territories or customers with a competitor.
- Never mislead or lie to customers.
- Never gather competitive information in an unethical or illegal manner.

"We must compete on the merits of our services and not engage in any form of unfair competition."

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**Question**

At a recent industry conference, I met a colleague who works for a competitor. He began talking about ways we could reduce prompt payment discounts. What should I do?

**Answer**

You should tell your manager about your conversation. If you find yourself in a situation like this in the future, you should not continue discussing this topic. This type of conversation could appear to be an attempt to restrict competition and violate competition laws.
Client, Customer & Other Key Relationships
Protect these relationships, they are key to our success

It is important that everybody understands the importance of acting appropriately in our relationships with clients, customers and other stakeholders.

If your job puts you in contact with any Company customers (or potential customers), clients or other stakeholders it is critical for you to remember that you represent the Company and its values. Act in a manner that always creates value and helps to build relationships based on trust. We have provided healthcare services for many years and built up significant goodwill over that time. This is one of our most important assets and Company employees must act to preserve and enhance our reputation.

Clients, customers and other stakeholders are critical to our future. To create an environment where they have an incentive to work with the Company, they must be confident that they will be treated lawfully and in an ethical manner.

Always remember:

■ Treat all parties fairly and with respect, always try to create trust in all relationships.

■ Never attempt to influence clients, customers or other stakeholders in any way with a corrupt intent.

■ Protect the confidential information of clients, customers and other stakeholders.

“Always act in a manner that builds a relationship based on trust and integrity.”

Question
A product manager of a client asked me about our distribution terms with them, but he is not a “delegated authority” member dealing with the distribution agreement. Should I tell him the terms?

Answer
No. Such information should not be shared with the product manager. Confidential information must be protected, and shared with only those who have a need to know or in accordance with our distribution agreements.
One of my colleagues sends jokes to our team. The jokes often have sexual undertones and upset me and other members of my team. What should I do?

**Answer**

Ask the person to stop sending such emails and report the matter to your manager or HR. Sending jokes with material containing racial, sexual or offensive undertones is a form of harassment and will not be tolerated.
During a tour of our warehouse, a client employee started to smoke a cigarette. How should I handle this situation?

Smoking is not allowed in our warehouses. You should politely ask the client employee to put out the cigarette and explain that we have a no smoking policy in the warehouse to protect our property, stock and health of employees.
Confidential information is vital to our business and third party relationships. This Code provides guidance on what it is and ways to protect it.

**What is Confidential Information?**

Confidential information is information about Zuellig Pharma that is not generally known or reasonably ascertainable. Often it has commercial value for the Company’s business and provides an advantage over our competitors.

**Examples of Confidential Information:**

- Strategies
- Budgets
- Business Processes & Information Systems
- Intellectual Property
- Trade Secrets & Service Capabilities
- Policies & Procedures
- Distribution Margins
- Trade & Price Discounts
- Sales Data
- Credit Terms & Payment/Collections Methods
- Pricing & Costing Information
- Marketing Information
- Contractual Terms & Other Sensitive Commercial Information
- Employee Salaries & Compensation

All employees are responsible for making sure adequate safeguards are in place to prevent the unauthorized disclosure or loss of confidential information.

We must protect confidential information we receive from third parties in the same way as we protect our information — as sensitive and not for general dissemination.

Contact your manager concerning any information breaches or if you have any questions about handling confidential information.

**Always remember:**

- Only disclose confidential information to employees who need to know such information
- Never try to acquire the confidential information of others
- Don’t encourage employees of a competitor, customer or supplier to disclose confidential information
- If you hire a former employee of a competitor, customer, supplier or work with someone who used to work for one of these parties, don’t ask the person to improperly disclose confidential information
- Always refuse unsolicited third party confidential information

**Question**

Our Account Manager for client “A” asked me about the pricing terms for client “B”. Can I give him the information?

**Answer**

No. Such information would be confidential to the client and must be protected.
We have clear responsibilities to protect and preserve the privacy of Personal Information gathered from patients, healthcare professionals, consumers, clinical trial subjects and employees. The highest standards of integrity must be applied when handling Personal Information.

We and our business partners are all accountable for protecting Personal Information and for processing them only within the boundaries of applicable laws and ZP policies and procedures.

**What is Personal Information?**

Personal Information (sometimes referred to as personally identifiable information) is information that is about, or can be related to, an identifiable individual. Some examples of Personal Information:

- Name
- Gender
- Date of birth
- Telephone number
- Home or email address
- National ID number
- Passport number
- Medical history
- Prescription history
- Physician notations
- Genetic information
- Purchase history
- Credit card details
- Bank account details
- Marital status
- Racial or ethnic origin
- Religious beliefs
- Offences or criminal convictions
- Fingerprints
- Physical characteristics

We must make sure we comply with local laws whenever we collect, store, use, disclose and destroy Personal Information.

**Always Remember:**

- Keep Personal Information strictly confidential and only use or disclose it in accordance with applicable laws and regulations and, when necessary, only after giving notice or obtaining the individual’s consent.
- Personal Information should not be disclosed to third parties except we have the individual’s permission or there is a legal reason to require otherwise.
- Collect Personal Information only for legitimate business purposes and keep it only as long as necessary.
- Take precautions to safeguard Personal Information.
- Share Personal Information only with individuals who have a legitimate need for it and will protect it properly.
- Properly destroy records containing Personal Information.
- Copying Personal Information (hard or soft copy) or transferring/storing Personal Information on portable devices is prohibited unless there is an approved business need and the Personal Information must be password-protected or encrypted.

**Question**

What should I do if I accidently lose my USB thumb drive which contained a patient’s Personal Information?

**Answer**

Report the incident immediately to the Data Privacy Officer in your country, as well as your direct supervisor.

Storage of Personal Information on portable devices is prohibited unless there is an approved business need and the Personal Information must be password-protected or encrypted.
It is important for us to provide guidance on trading on inside information in this Code because it can result in you being subject to civil or criminal actions, and damage Zuellig Pharma’s public image or its relationships with third parties.

During interactions with clients, customers, and other third parties, you may obtain material non-public or “inside” information that is commercially sensitive. Keep in mind that securities laws apply to everyone, not just employees of public companies. If you come into possession of inside information you cannot profit from it by buying or selling securities yourself, nor can you pass on the information to others for them to profit themselves or to profit on your behalf.

**Inside (Material Non-Public) Information**

Information about a company that is not known to the general public and that a typical investor would consider important in making a decision to buy, sell or hold the company’s securities. It may include information that something is likely to happen or even just that it may happen.

What might be considered inside information?

- Projections of future earnings or losses.
- Anticipated growth rates.
- Negotiations, discussions, and agreements regarding significant acquisitions, orders or strategic relationships.
- Changes in management.
- Significant new products and product launches.
- The gain or loss of a substantial customer or client.
- Information regarding securities offerings or other financing activities.

What happens if I trade securities based on inside information?

Trading on the basis of inside information, or passing inside information to anyone else who trades (even if you receive no financial benefit), is a crime and can result in significant fines and/or imprisonment. Inside trading rules are strictly enforced. You may also be subject to disciplinary action by the Company, including termination of employment.

**Question**

I am aware that one of our major clients is in the final phase of a clinical trial in preparation to launch a new product. Can I ask my wife to buy their shares?

**Answer**

No. If you are aware of inside information about a client, you cannot use it to your personal advantage, or pass the information to others, such as relatives or friends, for them to profit.
Zuellig Pharma must have sound financial records and statements in order for management to make informed decisions, and to meet the reporting and disclosure requirements of certain stakeholders. Our high level expectations of how this should be achieved are set out in this Code.

We require that all transactions are properly recorded in accordance with the Company’s accounting policies, and all applicable laws and regulations. Employees must maintain records that are accurate, honest and represent the facts. You must never provide or enter information in the Company’s books or records that intentionally misleads, misrepresents, misinforms, omits, or disguises the true nature of any transaction or result.

You are also expected to fully cooperate with independent and internal auditors and should immediately report any suspected violations or concerns to your manager.

“Never mislead, misrepresent, omit or disguise the true nature of a transaction or result.”

**Question**

I have met my sales quota for the third quarter. A co-worker in Accounting tells me that I can move my remaining sales for this quarter to the next quarter. Is this okay? It is still the same amount of revenue for the year.

**Answer**

This is not acceptable. Maintaining the accuracy and integrity of the nature of all revenue should never be compromised, as this may affect the manner in which management make decisions regarding the business.
Zuellig Pharma believes it has an ethical responsibility to protect the environment and comply with environmental laws and regulations. It is important for us to reinforce that commitment in this Code.

We are committed to the protection of the environment as part of every decision we make. Responsible environmental actions are not only important to our clients, customers, and other key stakeholders, it is the right thing to do. Our goal is to avoid any situation that may lead to unacceptable environmental or health hazards for employees, the public or the environment in general.

In addition, environmental laws in various countries apply to our operations. We are all responsible for complying with both the letter and spirit of applicable environmental laws and regulations, including the proper use and disposal of materials and waste, including:

- Solid and hazardous waste management
- Toxic substance control
- Expired or damaged inventory

Question

I visited one of our warehouses recently and an employee told me we are not destroying expired pharmaceutical inventory in accordance with local environmental requirements. What should I do?

Answer

We are all responsible for complying with environmental laws and regulations that apply to proper destruction of expired inventories. You should contact your manager, HR or use the confidential online reporting tool.

“Respect for the environment where we operate is good business.”
Zuellig Pharma’s public image is key to building trust with its employees, governments, clients, customers, other stakeholders, and the public. To ensure we maintain this trust, everyone needs to protect the Company’s public image. It is therefore important that our public communications are carefully managed.

You are not authorized to speak on behalf of the Company in public. In addition you are not allowed to publicly comment on issues related to our business. This restriction applies to:

- Commenting in blogs, chatrooms or in social networking sites
- Making comments in an open forum
- Speaking with media or journalists

All requests for public comments should be referred to your manager.

You should also be aware that whilst this Code is a public document, issues that arise out of the Code (e.g. specific violations) are not public information and should not be disclosed outside of Zuellig Pharma.

**Question**

I am going to make a comment on my Facebook or other social networking sites about some recent employees investigated for stealing company property. Will I get in trouble?

**Answer**

Yes. Making public comments about company investigations under this Code is not allowed. This includes making comments in your own Facebook site.
What should I do if I think a violation has occurred?

If you believe a violation of this Code has occurred or you have become aware of conduct that may be contrary to the Code, always try to discuss this first with your manager. Your manager has an obligation to either take action to resolve the issue or escalate it. If you have discussed it with your manager and you feel the issue has not been resolved, or if the violation involves your manager and you do not feel comfortable discussing it with your manager, then you can contact your manager’s supervisor, your local Compliance officer or the General Manager.

What happens if I feel uncomfortable talking to management or they have not resolved the issue?

We encourage you to speak up using the communication channels provided to you (see next page). The Speak Up hotlines & webline are operated by an independent third-party provider, and will not be traced or recorded. The Speak Up hotlines & webline allow you to voice your concerns, confidentially and anonymously. The third party provider will pass your concerns, but not your name if you choose to remain anonymous, to our Corporate Compliance Group.

Should I try to investigate something myself?

Don’t try to investigate or resolve a matter on your own. Your responsibility is to report a violation or concern. We take your reports seriously and will thoroughly investigate all reported violations or concerns. Please leave your contact information if you feel comfortable doing so and cooperate fully in any investigation.

Will I get in trouble if I report a violation?

No retaliation will be taken against anyone who reports an alleged violation of any law or Company policy, including this Code in good faith. Anyone who retaliates may be subject to civil, criminal, and administrative penalties as well as disciplinary action, up to and including termination of employment. Remember, you have the option to use the Speak Up hotlines & webline operated by an independent third-party provider if you feel uncomfortable discussing an alleged violation with local or regional management, and can do so anonymously.

Who should I ask questions concerning this Code?

You should talk to your manager first. However, if you do not feel comfortable talking to your manager, you may also talk to your manager’s supervisor, your local Compliance officer, local / Corporate HR or Corporate Compliance.

“...you have a responsibility to ask questions and to report any actual or suspected violations of this Code in order for us to build a better company. Your actions can make a difference.”
How to report violations of this Code?

Use the Speak Up channels listed below

You can make a report through the Speak Up channels by web, email or toll-free phone call, in English or your language. All reports can be made anonymously.

Web:
zuelligpharma.ethicspoint.com
You will be given the choice to select English or your local language.

Email:
whistleblowing@zuelligpharma.com

Toll-free telephone:
Calls will be answered by our independent hotline provider. When you call, tell them you are from Zuellig Pharma. If you do not speak English, please ask for an interpreter to join the call. Please stay on the line and do not hang up as your report is very important.

<table>
<thead>
<tr>
<th>Country</th>
<th>Number</th>
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<tbody>
<tr>
<td>Bangladesh</td>
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<td>1-800-1-111-0914</td>
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<tr>
<td>Singapore</td>
<td>800-110-2074</td>
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<td>South Korea</td>
<td>00308-132884</td>
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<td>Taiwan</td>
<td>00801-10-4471</td>
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<td>Thailand</td>
<td>001-80011-002-9735</td>
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<tr>
<td>Vietnam</td>
<td>1-288-0288 + 855-229-9304 / 1-201-0288 + 855-229-9304</td>
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Applicability

This Zuellig Pharma Code of Conduct, was approved by Interpharma Investments Ltd’s Board of Directors in January 2010, and is to be implemented by all Zuellig Pharma subsidiaries.

This Code of Conduct, October 2014, is an updated version of such and replaces all previous versions.