

Aurobindo Pharma USA (APUSA) Code of Conduct



AUROBINDO
Committed to healthier life!

APUSA CODE OF CONDUCT - OVERVIEW

APUSA is committed to operate within the spirit and letter of all laws and regulations affecting its businesses and employees.

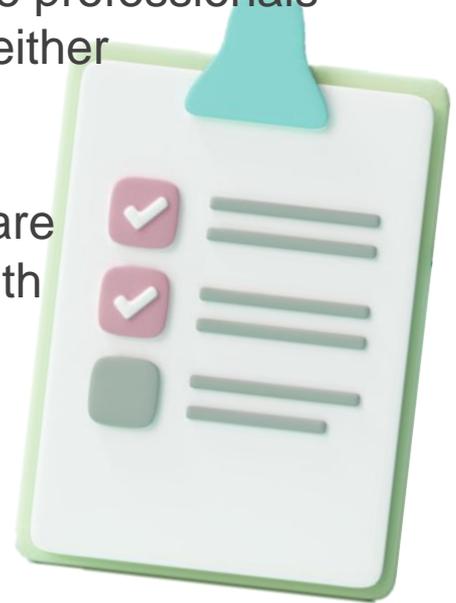
Employees must exercise the highest level of integrity, ethics and objectivity in their actions and relationships which may affect the Company.



APUSA CODE OF CONDUCT – OVERVIEW (*continued*)

In certain areas of our business, the customers are healthcare professionals (HCPs) involved in patient care. Any direct communications, either written or verbal, to HCPs must be approved.

All materials used to communicate information to customers are accurate, truthful, complete, not misleading, and compliant with all applicable US laws and regulations.



APUSA CODE OF CONDUCT

- 1 ● Hold paramount the safety, health and welfare of the public in the performance of professional duties.
- 2 ● Act in such a manner as to uphold and enhance personal and professional honor, integrity and the dignity of our profession.
- 3 ● Treat with respect and consideration all persons, regardless of race, religion, gender, sexual orientation, marital or family status, disability, age or national origin.
- 4 ● Comply with applicable federal, state and local laws, regulations and fiduciary responsibilities in an effort to create transparency in all of our operations.
- 5 ● Provide credible and effective oversight to the organization's work without personal bias.
- 6 ● Engage in carrying out Aurobindo's mission in a professional manner.



APUSA CODE OF CONDUCT

- 7 ● Conduct organizational and operational duties with positive leadership exemplified by open transparent communication, creativity, dedication, and compassion.
- 8 ● Serve with respect, concern, courtesy, and responsiveness in carrying out the organization's mission.
- 9 ● Demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in all activities in order to inspire confidence and trust in such activities.
- 10 ● Abide by the governing documents and policies of the Company.
- 11 ● Collaborate with and support other professionals in carrying out our mission.
- 12 ● Build professional reputations on the merit of services and refrain from competing unfairly with others.
- 13 ● Accept as a personal duty the responsibility to conduct themselves with professional competence, fairness, impartiality, efficiency, and effectiveness.



APUSA CODE OF CONDUCT

- 14 ● Avoid any interest or activity that conflicts with the conduct of their official duties.
- 15 ● Respect and protect privileged & confidential information to which they have access in the course of their official duties.
- 16 ● Strive for personal and professional excellence and encourage the professional developments of others.
- 17 ● Not accept commissions, payments, loans, promises of future benefits or other items of value from anyone who has or may seek some benefit from Aurobindo in return, other than occasional gifts of nominal value that are in keeping with good business ethics.
- 18 ● Honor our commitments and promises to the best of our abilities.
- 19 ● Demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in all activities in order to inspire confidence and trust in such activities.



ETHICS

CUSTOMER, PEOPLE AND BUSINESS CARE

- The Helpline is an anonymous way to report potential healthcare compliance concerns without fear of reprisal and allows the Company to address and resolve any reported issue.
- Each of us has an obligation to report suspected or observed misconduct or violation of Company policy.



The Company will protect you from retaliation for raising a compliance concern in good faith; APUSA prohibits retaliation, in any form, against individuals who have reported suspected misconduct in good faith.



ETHICS

CUSTOMER, PEOPLE AND BUSINESS CARE

To learn more or ask a question, contact

Melanie Leney, DGC / Head of Compliance



MLeney@aurobindousa.com

To ask a question or report a suspected violation anonymously and without fear of reprisal, contact



Helpline: 844-744-9516
(calls can be made anonymously)



Website: <https://aurobindousa.ethicspoint.com>

