



AUROBINDO PHARMA CODE OF CONDUCT

Issued by Aurobindo Pharma USA, Inc.



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Introduction to Our Code

At Aurobindo Pharma USA, Inc. (Aurobindo), we are committed to operating within both the spirit and the letter of all applicable laws and regulations and to conducting our business with the highest standards of integrity, ethics, and objectivity.

Our Code of Conduct reflects our responsibility to patients, healthcare professionals, customers, employees, and the communities we serve. It establishes the principles that guide how we act, how we make decisions, and how we hold ourselves accountable.

We operate across multiple business lines and geographies, each subject to different legal and regulatory requirements. While these requirements may vary, our commitment to ethical conduct is universal. Where standards differ, we are expected to follow the most stringent applicable requirement.

We also recognize that in certain areas of our business, our customers include healthcare professionals involved in patient care. Accordingly, all communications must be accurate, truthful, complete, not misleading, and compliant with applicable laws and regulations.

No Code can address every situation. Each of us is responsible for using sound judgment, acting with integrity, and seeking guidance when needed.

Human Rights, Workplace Environment, and Employee Well-Being

We are committed to maintaining a workplace that respects human rights and supports the dignity, safety, and well-being of all individuals. We treat all persons with respect and consideration, regardless of background or personal characteristics, and we foster an inclusive environment where individuals are valued and supported.

We strive to provide a work environment that promotes both physical and mental well-being and enables employees to contribute fully and safely. These expectations extend to our business partners and throughout our operations.

Patient Focus, Safety, and Public Responsibility

We hold paramount the safety, health, and welfare of the public in the performance of our professional duties.



We are committed to ensuring that our products, communications, and business practices support patient safety and public health. This requires professionalism, accountability, and a clear understanding of the impact our work has on patients and the healthcare system.

Integrity, Honesty, and Professional Conduct

We act in a manner that upholds and enhances personal and professional honor, integrity, and the dignity of our profession.

We demonstrate the highest standards of truthfulness, honesty, and ethical conduct in all activities. We honor our commitments and conduct ourselves in a way that inspires confidence and trust among colleagues, customers, and stakeholders. We engage in all activities with professionalism, sound judgment, and accountability.

Respect, Inclusion, and Workplace Expectations

We are committed to a workplace built on respect, fairness, and inclusion. We treat others with courtesy, responsiveness, and professionalism and value collaboration across teams and functions. We do not tolerate discrimination, harassment, or retaliation and are committed to maintaining a work environment where individuals feel safe, respected, and empowered.

Compliance, Transparency, and Ethical Business Practices

We comply with all applicable federal, state, and local laws, regulations, and Company policies and act with transparency in all of our operations.

We uphold both the letter and the spirit of the law, including those governing research, manufacturing, marketing, and promotion.

We ensure that all communications—particularly those involving healthcare professionals—are properly reviewed, accurate, and not misleading. We do not engage in deceptive, unfair, or unethical practices and build our professional reputation on the merit of our work.

Books, Records, and Financial Integrity

We are responsible for creating and maintaining accurate, complete, and timely records that reflect the true nature of our business activities.



We follow applicable accounting standards, internal controls, and documentation requirements and do not falsify or misrepresent information. Transparency and accuracy in our records are essential to maintaining trust and accountability.

Objectivity, Oversight, and Accountability

We provide credible, effective, and unbiased oversight in the performance of our duties.

We accept personal responsibility for our actions and are accountable for performing our roles with competence, fairness, impartiality, efficiency, and effectiveness. We exercise independent judgment and avoid conduct that could compromise our objectivity.

Conflicts of Interest

We avoid any interests or activities that conflict, or appear to conflict, with the performance of our duties.

We act in the best interests of the Company and disclose situations that could interfere with our ability to make objective and impartial decisions.

Confidentiality and Protection of Information

We respect and protect privileged, confidential, and proprietary information obtained in the course of our work.

This includes personal data relating to patients, healthcare professionals, employees, and clinical research. We use such information only for legitimate business purposes and safeguard it in accordance with applicable privacy and data protection laws.

Intellectual Property

We protect the Company's intellectual property and respect the intellectual property rights of others.

We safeguard proprietary information, innovations, and business assets and do not misuse or improperly access the intellectual property of third parties.



Anti-Bribery and Improper Payments

We do not accept or offer commissions, payments, loans, promises of future benefits, or anything of value intended to improperly influence business decisions.

This applies to all interactions with healthcare professionals, government officials, customers, and business partners. We conduct all engagements in a manner consistent with ethical standards and applicable laws.

Fair Competition

We are committed to fair and open competition and comply with all applicable antitrust and competition laws.

We make independent business decisions and do not engage in agreements or discussions with competitors that could restrict competition, including price fixing, market allocation, or sharing sensitive information.

Environmental Responsibility

We recognize our responsibility to minimize the environmental impact of our operations and to conduct our business in a sustainable and responsible manner.

We comply with applicable environmental laws and take steps to support environmentally sound practices in our operations.

Professional Excellence and Development

We strive for personal and professional excellence and encourage the development of others. We are committed to continuous improvement, collaboration, and supporting our colleagues in achieving shared goals.

Collaboration and Professional Responsibility

We collaborate with and support other professionals in carrying out our mission.

We approach our work with dedication, creativity, compassion, and a commitment to positive leadership and open communication.



Insider Trading

We do not use or share material non-public information for personal or financial gain. We comply with applicable securities laws and act responsibly to maintain the integrity of the financial markets.

Speaking Up and Reporting Concerns

Each of us has a responsibility to report suspected misconduct or violations of Company policy. We encourage open communication and provide multiple channels for raising concerns, including management, Legal, Ethics & Compliance, Human Resources, and the Company's anonymous Ethics Helpline.

TO MAKE A REPORT USING the Ethics Helpline:

(844) 744-9516

(U.S., Guam, Puerto Rico & Canada)

<https://aurobindousa.ethicspoint.com>

Reports will be taken seriously, investigated appropriately, and addressed promptly. The Company strictly prohibits retaliation against individuals who report concerns in good faith.

Final Thought

This Code reflects our legal and compliance obligations and also our shared commitment to doing what is right.

No Code can anticipate every situation. Each of us must rely on sound judgment, act with integrity, and uphold the principles that define who we are as an organization. When in doubt, we are expected to pause, seek guidance, and choose the course of action that reflects our strong values.

Dated: May 12, 2026