



CODE OF BUSINESS CONDUCT AND ETHICS

TABLE OF CONTENTS

1. What are our Purpose, Vision and Values?
2. What is the purpose of the Alvogen Code of Business Conduct and Ethics?
3. Who is responsible for compliance with the Alvogen Code of Business Conduct and Ethics?
4. What is expected of you?
5. The Principles of the Alvogen Code of Business Conduct and Ethics



A MESSAGE FROM OUR CEO AND CHAIRMAN

Our purpose and values define what is important in the way that we work together and perform as a business. We are intent on constantly demonstrating our commitment to being a trusted and respected company.

Reputation is critical to Alvogen's success and long-term sustainability. We all have a responsibility to ensure we strive to do the right thing and, in so doing, protect our reputation. Acting with integrity is the shared responsibility of both the Company and each of us individually. In today's connected world, our individual actions have the potential to impact Alvogen globally, both positively and negatively. All of us, including those acting on behalf of Alvogen, have an obligation to apply the Alvogen Code of Business Conduct and Ethics (the "Code"), and Alvogen policies, and to follow all relevant laws, rules, and regulations in everything we do.

In producing the Code, we aim to provide a clear and accessible document with practical guidance on our individual responsibilities based on key principles. The Code and Alvogen's related policies and procedures cannot address every situation we may face and they are not a substitute for common sense and good judgement. When in doubt, seek advice, talk to your colleagues to get their perspective, talk to your line manager, our Global Compliance Officer, or an expert from the appropriate function.

If you are concerned about something that does not appear to support our purpose and values or contravenes the law, the Code, or Alvogen policies, you should speak up. We will not tolerate any retaliation against an individual for raising a concern or making a report in good faith.

We want Alvogen to be recognised as a great place to work. Most of all, however, we want Alvogen to be associated with integrity and responsibility—a business with values that are demonstrated every day and are deeply embedded in the fabric of our organisation. Our combined efforts will enable us to better meet the needs of our patients, to deliver sustainable performance, and strengthen our reputation.

Thank you for your continued support and commitment to integrity.
Robert Wessman

1. WHAT ARE OUR PURPOSE, VISION AND VALUES?

Our purpose is to re-think generics by creating a radical new business model that enhances quality of life and delivers exceptional value to all our stakeholders.

Our vision is to be the Preferred Partner in all our markets by setting a new standard for the generics industry.

Our values represent the behaviours and attitudes needed to fulfil and reinforce our purpose and guide our day-to-day decision making process.

We will become a Preferred Partner by being the best in the following focus areas:

- Best Portfolio - by creating a targeted and profitable portfolio focused on the needs of our customers in each market
- Best Quality - by being committed to the highest quality standards for all our products and services
- Best Service - by consistently achieving reliable and timely product delivery, effective stock management and strong customer relationships
- Best People/Team - by selecting, developing and retaining experienced, collaborative and passionate people who can work as one to achieve our objectives
- Lower Cost - by consistently looking for more efficient ways of using our time and other resources

2. WHAT IS THE PURPOSE OF THE ALVOGEN CODE OF BUSINESS CONDUCT AND ETHICS?

The Code provides guidance and information on key areas of our business activities and outlines our individual responsibilities - the things we must all do. All employees and those representing and acting on behalf of Alvogen must apply the Code and Alvogen's policies and procedures that relate to their role, regardless of their location or nature of work. It is critical that we all familiarise ourselves with the Code and the Alvogen policies and apply them to everything we do.

Breaching the Code or Alvogen policies can have serious consequences for the company and for each of us as individuals. Those of us who fail to follow the Code put themselves, their colleagues and Alvogen at risk. Violations of the Code may result in corrective actions, up to and including termination of employment and, where appropriate, disclosure to governmental and regulatory authorities.

The Code, along with the Compliance Handbook, are resources to be used to help guide our actions and provide details on where to go for more information on a particular subject, to ask a question or report a problem.



3. WHO IS RESPONSIBLE FOR COMPLIANCE WITH THE AVOGEN CODE OF BUSINESS CONDUCT AND ETHICS?

The Principles outlined in the Code apply to all employees as well as to our third party consultants, contractors, vendors and suppliers to the extent they engage in activities described in the Code. You are responsible for compliance with the Code and Alvogen policies and procedures in addition to all laws, rules, regulations and industry standards. The company trusts each of us to act in a way that is not only compliant but that also supports our vision and values.

If you manage people you are expected to adopt the Alvogen leadership standard and be a role model for others. You must ensure that individuals who report to you receive the guidance, resources and training they need to enable them to do their job in compliance with the Code and Alvogen policies. You must take personal accountability for creating an environment of trust in which people feel able to ask questions, raise concerns and report suspected violations without fear of reprisal. There may be disciplinary action for any level of management in case of any lack of diligence, supervision or leadership with regard to the application of the Code and Alvogen policies and procedures.

We expect temporary and contract employees, consultants, agents and any other third party who acts in Alvogen's name to act in accordance with the principles of the Code. If you are involved in retaining any such third party, it is your responsibility to ensure that they are made aware of the Code and our expectation that they act in accordance with its principles.

4. WHAT IS EXPECTED OF YOU?

You are expected to read, understand and adopt the Code. This means:

- You must learn about and comply with the laws, rules, regulations and Alvogen policies and procedures that apply to your job
- You must receive training on the Code and the Compliance Handbook, which are provided either by the Global Compliance team or by your local Human Resources department
- You must sign the Alvogen Code of Business Conduct and Ethics Certification to confirm that you have read, understood and will comply with the Code
- You will be asked to certify your compliance annually as part of your annual review to ensure you are kept up to date with changes and updates to the Code and Compliance Handbook
- You must seek advice and guidance if you are unsure about the course of action to take and encourage others to do the same
- You must always report promptly any potential or actual breaches of the Code of which you are aware to your line manager, Human Resources, or the Global Compliance Officer

5. THE PRINCIPLES OF THE ALVOGEN CODE OF BUSINESS CONDUCT AND ETHICS

- (A) Comply with laws, rules and regulations
- (B) Promote a culture of integrity, respect and trust in the workplace
- (C) Maintain product quality, safety and integrity as well as supporting the environment, and health and safety
- (D) Promote our products truthfully and maintain positive interactions with health care professionals
- (E) Act responsibly in the use of Alvogen's assets
- (F) Assure the integrity of Alvogen's books and records
- (G) Safeguard Alvogen's confidential information and individuals' personal information
- (H) Avoid conflicts of interest
- (I) Comply with international trade laws
- (J) No insider trading
- (K) Act with integrity and ethically in all business dealings

(A) COMPLY WITH LAWS, RULES AND REGULATIONS

Alvogen strives to be a good corporate citizen in every manner. We are committed to comply with our own procedural documents, all applicable laws, rules, regulations, and industry codes of countries where Alvogen does business. Violation of such laws, regulations and industry codes may subject Alvogen and its employees to civil and/or criminal penalties, including imprisonment.

As Alvogen employees, we are responsible for familiarising ourselves with all basic legal requirements that apply to our duties. Each of us and any third-party acting on Alvogen's behalf is expected to be familiar with and ensure compliance with the Code, the Compliance Handbook, and all applicable Alvogen policies and procedures.

If a local custom or law in the business or region in which Alvogen operates differs from the Code or the policies and procedures of Alvogen, you must follow the most stringent rules. You should seek guidance from your immediate supervisors or from the Global Compliance Officer in case of ambiguity as to which regulatory requirements apply to your activities or in case you have any questions regarding application of the law or Alvogen policy.

This Code sets out minimum requirements, which must be followed unless doing so would violate local law, in which case, you are required to inform your supervisor or Human Resources manager or the Global Compliance Officer.

(B) PROMOTE A CULTURE OF INTEGRITY, RESPECT AND TRUST IN THE WORKPLACE

An integrity-based culture promotes a workplace that you can enjoy and that you can be proud to be a part of. This means treating others as you would expect to be treated – fairly, honestly, with integrity, respect and trust. Alvogen promotes an equal opportunity environment for all.

(i) Equal Opportunity Free from Discrimination or Harassment

As a global organisation, Alvogen welcomes and promotes diversity of approaches and cultures and is committed to providing equal opportunities in a positive work environment for all employees regardless of their race, sex, religion, colour, age, sexual orientation, marital status, ancestry or citizenship. As such, Alvogen promotes a professional environment free from any form of verbal or physical intimidation, discrimination or harassment.

Q: One of your colleagues keeps telling jokes that are demeaning to minority groups and women. These jokes offend you although you don't think he realises this and he probably does not intend any harm. What should you do?

A: Jokes that create a negative or hostile environment are not acceptable in the workplace. If you feel comfortable raising the issue with your colleague, you are encouraged to let him/her know that his/her jokes make you feel uneasy. If you are not comfortable doing so, you should contact your supervisor, HR or Compliance.

(ii) A Healthy and Safe Working Environment for all Employees

Alvogen recognises the importance of a safe and healthy environment for you to work in. With this in mind, regardless of your role within the organisation you are expected to know the health and safety requirements of your job and conduct yourself in a manner that promotes and protects the safety and wellbeing of both you and your colleagues.

Alvogen's policy is to maintain a drug-free working environment. Possession, use or being under the influence of illegal drugs is strictly prohibited. If you participate in company sponsored events where alcoholic beverages are available, you are expected to use good judgement and behave in a manner appropriate for a company function. These concepts apply in the workplace, on Company property and in any work-related setting outside of the workplace, such as during business trips, meetings and business-related social events.

Q: Should you report every injury you receive while on the job?

A: Yes, you must promptly report all of your injuries. Reporting all your injuries ensures proper medical treatment and preventive measures are taken for your and others' safety.

(C) MAINTAIN PRODUCT QUALITY, SAFETY AND INTEGRITY AS WELL AS SUPPORTING THE ENVIRONMENT, AND HEALTH AND SAFETY

Alvogen is committed to providing medicines that meet or exceed customer expectations and regulatory requirements. Alvogen is committed to compliance with global current Good Manufacturing Practices. We foster the continuous, proactive improvement of our production and process capabilities and take responsibility for upholding the highest standards of quality for Alvogen medicines.

Q: You think there may be an issue with one of the manufacturing processes at your facility. We are behind schedule, and if you say anything, we will have to hold all products that went through the process while the Quality team investigates. This will put us even more behind schedule. What should you do?

A: Alvogen never sacrifices quality to meet a deadline or target. You should report the matter through the appropriate channel immediately. The quality of our products cannot be compromised. The quality team needs to investigate.

Alvogen also monitors safety data associated with our marketed medicines as patient safety is our priority. We are ethically and legally obliged to track and report any adverse events or product quality complaints associated with our products.

Q: While at a cocktail party in my hometown, a neighbour mentioned that she was experiencing some unwanted side effects while taking one of our drugs. Do you need to report this?

A: Yes, you should report this event immediately even if she (or you) is not

Alvogen is also committed to protecting the integrity of its products and brands from counterfeiting, tampering, thefts or diversion.

Alvogen cares about the communities where we operate and we conduct business in an environmentally sustainable manner. We consider environment protection, as well as personal and public health and safety, essential parts of our everyday responsibilities.

(D) PROMOTE OUR PRODUCTS TRUTHFULLY AND MAINTAIN POSITIVE INTERACTIONS WITH HEALTH CARE PROFESSIONALS

Alvogen markets its products on the basis of quality, efficacy, safety and value. Compliance with applicable laws and adherence to ethical standards are important to Alvogen's ability to continue to collaborate with health care professionals. This extends to ensuring that all promotional activities and presentations used by the Company or its employees, including product claims and comparisons, are accurate, balanced, fair, objective, unambiguous and consistent with product labelling. Any product efficacy claim must be substantiated and balanced with relevant safety information. Statements should not mislead the intended audience.

Q: From personal use, you know one of our products can be effective in treating a medical condition for which the product is not approved. Are you allowed to share this information with the physicians you call on in a promotional setting, since I am just sharing something from my personal experience?

A: No. Alvogen employees may not promote uses of a product that are inconsistent with the approved product labelling. In addition, as an Alvogen representative, you may not promote products for any off-label indication, which includes discussing your personal experience with the product as an off-label medical treatment.

Interacting with health care professionals and medical institutions is an important part of our business. These interactions are subject to many laws and regulations to help ensure they are appropriate. They can take the form of research and development, training, education, service and support to enable the safe and effective use of Alvogen products, and supporting medical research, education, and enhancement of professional skills.

In the event that our research or business require that we engage the services of a health care professional, we do so in order to meet a legitimate and appropriate business purpose and only when the terms of the engagement are consistent with legal and Alvogen policies' requirements. We adhere to applicable industry guidelines and other regulations, only offering meals and hospitality in a manner that is consistent with our policies and conducive to educational, clinical or scientific discussions. Where required by law, we collect, report and disclose payments and other transfers of value made to healthcare professionals. To ensure ethical interactions with individuals or entities that purchase, recommend, or use Alvogen products, you must follow the policies and procedures prescribed in the Code and Compliance Handbook.

(E) ACT RESPONSIBLY IN THE USE OF ALVOGEN'S ASSETS

Alvogen provides you with assets that you need to successfully perform your duties. These include (a) physical items, such as buildings, computers, furniture, office supplies and equipment, and (b) informational assets, such as intellectual property, work documents and electronic information. All these assets contribute to Alvogen's success and should be used only for legitimate business purposes. Therefore, you are expected to use these assets responsibly and protect them against loss, theft, or other misuse.

Q: From personal use, you know one of our products can be effective in treating a medical condition for which the product is not approved. Are you allowed to share this information with the physicians you call on in a promotional setting, since I am just sharing something from my personal experience?

A: No. Alvogen employees may not promote uses of a product that are inconsistent with the approved product labelling. In addition, as an Alvogen representative, you may not promote products for any off-label indication, which includes discussing your personal experience with the product as an off-label medical treatment.

The incidental personal use of Alvogen's devices and technology (computer, internet access) is permitted as long it does not interfere with your performance or the performance of your colleagues and does not violate the Code. Any suspected improper use, loss or theft should be reported to your supervisor.

(F) ASSURE INTEGRITY OF ALVOGEN'S BOOKS AND RECORDS

Accurate information and timely reporting is essential for good decision making. All of Alvogen's books and records must be accurate, full, fair and honest and must comply with Alvogen policies and procedures. The term books and records applies to all business documents and records including but not limited to production records, research notes, lab books, clinical studies, engineering reports, regulatory submissions, payroll and time records, travel expense reports, contracts, accounting records, invoices and bills of lading.

Q: Since you are allowed to spend a certain amount on business meals per-person, do you have to record every person in attendance at the meal if the meal was so inexpensive that only entering half of the attendees would keep you below my maximum cost -per-person?

A: Yes, business records must be accurate and complete. While the issue of cost-per-person is addressed by entering half of the attendees, to do so would create an inaccurate business record. You must include all attendees of the meal to create a complete and accurate record.

In addition, Alvogen is committed to providing full, accurate, fair, timely and understandable financial records and accounts in accordance with applicable external accounting requirements and IFRS accounting standards, which have been adopted by the Group.

All records and documents that you create or are responsible for should be retained in accordance with the Alvogen document retention policy. Where there are differences between the Alvogen policy and local legal retention requirements, guidance should be sought from the Global Compliance Officer.

(G) SAFEGUARD ALVOGEN'S CONFIDENTIAL INFORMATION AND INDIVIDUALS' PERSONAL INFORMATION

As with all companies and organisations, Alvogen has information that is valuable and confidential. As you perform your day-to-day tasks you may learn or gain access to this valuable confidential information. It is your responsibility to safeguard this information against inappropriate use or disclosure.

Q: While in an airport on business travel, you need to participate in a conference call to discuss the upcoming release of a new product. The airport is crowded and any comments you make may be overheard.

A: Discussing confidential information in public places is risky and should be avoided. Since the topic of the call is highly confidential, you should reschedule the call if possible. If you are unable to do so, you should limit your discussion of confidential information and take appropriate steps to prevent others from overhearing your conversation.

Confidential information means all information that is not currently known or generally available to the public and can include patent applications, trade secrets, business strategy, product development or launch plans, manufacturing information, marketing plans, pricing information, merger or acquisition plans and personally identifiable information (e.g. national identification numbers, contact information, credit card data and health information). Such information may be owned by Alvogen or by third parties with whom Alvogen has an agreement to share/use information. It is critical that you do not discuss any confidential information with family, friends, co-workers or anyone that does not have a legitimate business need to know.

Q: You have been receiving calls from reporters asking about the company. Is there something you should say when you get these calls?

A: Unless you are authorised to speak on behalf of the company, you should not answer external questions about Alvogen. You should indicate to the callers that you are not authorised to speak on behalf of the company and then direct them to the Alvogen Corporate Communication Team.

In addition, you should not communicate any confidential information with reporters, market research firms or investors. Any external request you receive for information must be immediately passed to the Alvogen Corporate Communication Team.

Alvogen holds a considerable amount of information which relates to employees, patients, health care professionals, contractors, customers and many others. Privacy laws exist globally, and, therefore, preserving the confidentiality of private information about individuals and organisations we deal with is critically important to Alvogen. You must respect those individuals' rights of privacy and safeguard the confidential nature of such information to which you have access to, regardless of the source, subject, owner or purpose of the data.

(H) AVOID CONFLICTS OF INTEREST

As an Alvogen employee or contractor you must conduct any business dealing in the name of Alvogen ethically and fairly and in the best interests of Alvogen. This means all your dealing in the name of Alvogen must be free of any real or potential conflict of interest.

Some examples of potential conflicts of interests:

- **An employee wants to hire a supplier to perform work for Alvogen but the employee's husband works at the supplier.**
- **An employee wants to invest a substantial amount of money in a company that is a major supplier to Alvogen.**
- **A substantial gift was received from a supplier.**

Q: Your brother-in-law has an ownership interest in a potential supplier that your department is seeking to use. You don't have direct decision-making power on the project, do you need to report anything?

A: Any potential conflict of interest should be disclosed in writing and approved by your supervisor. It is best to report the facts and let Alvogen decide if the situation poses any potential conflict of interest

A conflict of interest may exist if you, a family member or close friend works for, owns, or is a director of a company with which Alvogen conducts or wishes to conduct business and when you are in a position to influence that decision to conduct business. Our business decisions must be governed by good judgment and objectivity, without concern for any personal interests.

If you encounter a real or potential conflict of interest, you must disclose your interest in writing to your manager preferably in advance. Your supervisor will determine whether the Legal department and/or the Global Compliance Officer need to be consulted or notified.

(I) COMPLIANCE WITH INTERNATIONAL TRADE LAWS

As a company with global operations, Alvogen complies fully with all applicable international trade laws. As these laws limit our ability to engage in business interactions with or in certain countries, we must be mindful of relevant laws when conducting business internationally. We will follow all applicable laws, regulations and restrictions when importing or exporting goods, information, software or technology. The export and re-export of goods are highly regulated around the world. If you are involved in any global trade activities, you are responsible for knowing relevant laws, including export and import controls and trade restrictions. We will also abide by applicable anti-boycott laws and will promptly report to authorities any request for Alvogen to participate in a boycott.

Q: You recently shipped goods cross-border and now realise that the relevant documentation listed the value of the goods as lower than their actual value.

A: Incorrectly listing the value of goods that are shipped may impact the taxes applied to the trade transaction such as custom duties. Since the goods are already shipped, you should report the discrepancy through appropriate channels so that the error can be corrected and accurate taxes paid.

(J) NO INSIDER TRADING

Securities of publicly held companies cannot be traded on the basis of insider information. If you have knowledge of material non-public information about other companies we do business with, you should treat the information as confidential and should not trade in the stock of these companies. Material non-public information includes any information that might influence an investor's decision to buy or sell securities or that could have an impact on the price of a company's securities if the information was publicly released. Examples of insider information include proposed merger or acquisition, projections of earnings or losses, launch of a new product, gain or loss of a significant business relationships, and changes in company leadership.

Q: One of our suppliers has informed you that they just won a major contract with the government. Are you allowed to buy stock in the supplier, given that you do not work for them and the information will be released any day?

A: It is illegal to trade in securities while in possession of material, non-public information about the company in question. You may be in possession of information that is material and that has not yet been disclosed, so you should not buy stock in the supplier without checking if the information is material. Once the information is public, you may buy the stock.

(K) ACT WITH INTEGRITY AND ETHICALLY IN ALL BUSINESS DEALINGS

Alvogen encourages ethical business practices and socially responsible industry conduct, and is committed to fair competition. Alvogen will not permit, encourage nor support any unlawful inducement in order to sell our products or services.

(i) Fair Dealing with Customers and Suppliers

Alvogen is committed to dealing fairly with its business partners, relying on the merits of its products and people. We respect and adhere to fair competition and trade practices laws. Therefore, we will not discuss or make any improper agreement with our competitors that affects prices, costs or terms or conditions of sales, unfairly restricts trade or excludes competitors, suppliers or customers from the marketplace. We will not disparage our competitors' products and we expect our competitors to hold themselves to similarly high standards.

(ii) Bribery and Corruption

You must understand and strictly comply with all applicable anti-bribery legislation. It is against our policy to bribe anyone or receive a bribe from anyone, anywhere in the world, irrespective of whether this may result in Alvogen losing a business opportunity. You must not offer, authorise, process, make, request or accept payment of money or anything of value to improperly:

- (a) influence the judgement or conduct of any individual, customer or company,
- (b) win or retain business,
- (c) influence any act or decision of any governmental official, or
- (d) gain any improper or undue advantage.

These requirements extend not only to direct inducements, but also to indirect inducements made in any form through agents, consultants, distributors or other third parties.

(iii) Political Contributions

Political Contributions to a political party, party official, or candidate for office on behalf of Alvogen are strictly prohibited. Any such contributions made on a personal basis should not make any reference to the Company in any way. Any identification of the Company in connection with campaigning or fundraising on behalf of a political party, party official or candidate for office is strictly prohibited.

(iv) Business Courtesies

Business courtesies, which can include gifts, hospitality, travel, entertainment, or anything else of value, should be provided only for a legitimate business purpose and must be approved in advance in accordance with the procedures in the Compliance Handbook. Specifically, business courtesies should not:

- violate local laws, regulations or Company policies and Compliance Handbook,
- be viewed as an inducement for a particular business decision,
- be lavish or excessive in value,
- be inappropriate in terms of venue

Q: It would be considered an insult in certain countries to refuse a gift from a business associate. How should you handle gifts in these countries?

A: Alvogen respects the customs of individual cultures. If you work in or travel to a country in which it would be disrespectful to turn down a gift, you should contact your supervisor or the Global Compliance Officer to determine how to proceed. In some cases, you may be able to accept the gift as company property. You should remember that overly lavish gifts or gifts that appear to be intended to influence you are never appropriate regardless of cultural expectations.

If you have any doubt as to whether it is appropriate to accept a gift, you must promptly disclose the situation to your immediate supervisor or the Global Compliance Officer to seek appropriate guidance before taking action.

Now that you have read and understood the Code the next logical question is -

WHAT SHOULD YOU DO IF YOU ARE FACED WITH AN ETHICAL OR LEGAL CONCERN?

It is your responsibility to raise any concerns regarding possible violations of the Code with your manager, Human Resources, the Legal department, or the Global Compliance Officer. It is essential that, if you suspect any wrongdoing by any officer, employee or contractor that you act quickly in order that the issue can be investigated and addressed as quickly and as efficiently as possible. Your prompt action can help reduce the wider impact of any wrongdoings or violations of the Code. Under no circumstances should you investigate the matter yourself.

CONTACTING THE GLOBAL COMPLIANCE AND ETHICS OFFICER

Alvogen offers many ways for us to speak up, ask questions, and raise concerns regarding potential violations to the Company's Code of Business Conduct and Ethics, policies, or laws. These channels include (1) Compliance Leaders, (2) Legal Department, (3) Human Resources, and (4) our Direct Managers.

In addition, Alvogen has developed a confidential email address where reports can be made at any time by anyone who has observed an issue. Your personal information will be kept confidential and will only be used by the Alvogen Global Compliance and Ethics Officer to follow up on any issues raised.

speakup@alvogen.com

PROTECTING YOUR IDENTITY AND SAFEGUARDING YOUR CONFIDENTIALITY

When you contact the Global Compliance Officer, your identity will be kept confidential. If you contact the Office through 'SpeakUp' your identity will automatically be kept confidential. Open communication is crucial to the success of our Company. We are committed to maintaining a work environment where people can ask questions, raise concerns, and make appropriate suggestions regarding business practices. Therefore, Alvogen strictly prohibits any form of retaliation against anyone who in good faith reports any actual or potential Code violations or concerns. If you feel you or a fellow employee are the subject of retaliation for making a good faith report then you must immediately contact your manager, Human Resources or the Global Compliance Officer.

CONCLUSION

At Alvogen, we want to be proud of the work we do, but we also want to be proud of how we do it. No Code or policy can on its own guarantee compliance with the law or ethical decision-making. It takes a continued sense of individual responsibility and commitment to doing the right thing. We share individual responsibility for acting with the utmost ethical integrity so that collectively we can become an industry leader and improve patients' lives.

