

Elanco Code of Conduct



ElancoTM

A Message From Our CEO

Elanco colleagues around the world are committed to the belief that making life better for animals makes life better. We deliver products and services to prevent and treat disease in farm animals and pets, creating value for farmers, pet owners, veterinarians, stakeholders and society as a whole. We innovate to stay ahead of the curve, delivering transformational solutions to the ever-changing world of animal care.

All of this is possible because of our Elanco team. Our people uphold and exemplify our values of **integrity**, **respect**, and **excellence** in everything they do. Our values, together with our Code of Conduct, form the foundation of ethical behavior at Elanco.

Our Code of Conduct comprises Ten Responsibilities that guide our decision making and interactions with others. The Responsibilities are supported by policies, procedures, and other guidance that set out our ethical expectations and offer support for any questions or concerns.

We operate in a complex and evolving environment where new regulations are introduced frequently. I do not expect you to keep up with these changes every day. You should feel comfortable seeking advice and asking questions when you're unsure or don't know what to do. We all have a responsibility to foster a culture of integrity, which means we all must raise concerns and report misconduct. We encourage employees, contractors, and suppliers to report any known or suspected violation of our Code of Conduct, policies, procedures, or laws that regulate our business without fear of retaliation.

Thank you for following our Code of Conduct and exercising these Responsibilities to stay true to our values of integrity, respect, and excellence. We must hold each other accountable to protect the success of Elanco and deliver on our vision of Food and Companionship Enriching Life.

Jeff Simmons

President and CEO, Elanco



Our Vision

Food and Companionship Enriching Life

Our Promise

We will rigorously innovate to benefit our customers and improve the health of animals.

FOR OUR CUSTOMERS

We will be your advocate and continually earn your trust, improving the health of animals and creating value through innovative products, expertise and service.

FOR OUR EMPLOYEES

Together, we will foster an inclusive culture where you can make a difference, encouraging ownership, growth and well-being while focusing on customers and the animals in their care.

Elanco Culture

Values That Guide Decisions

INTEGRITY

Do the right thing in the right way.

RESPECT

Respect people, our customers and the animals in their care.

EXCELLENCE

Be accountable. Continuously improve. Deliver with discipline.

Behavioral Pillars That Guide Our Actions



DELIVER

We will focus on the essential, build mastery and diligently deliver on our commitments to our colleagues, customers and shareholder. Disciplined execution, thought and people.



INNOVATE

Bring an innovative mindset that drives continuous improvement of our processes, products and services.



INVOLVE

Seek participation and input to gain commitment, passionate performance and create an engaged community. Act with humility as one Elanco, collaborating for the best outcomes for the entire company.



OWN

Be accountable and empowered. Ask questions and raise concerns. Be fully invested in Elanco's success.



Our Responsibilities

The Code of Conduct (“Code”) is built around 10 Responsibilities that provide the foundation for ethical behavior at Elanco. These Responsibilities guide our decision making and are supported by policies, procedures and other guidance.

1. [Do the Right Thing Always](#)
2. [Conduct Business Ethically](#)
3. [Respect Each Other Always](#)
4. [Respect Privacy and Safeguard Information](#)
5. [Ensure Financial Integrity](#)
6. [Communicate Honestly](#)
7. [Relentlessly Pursue the Best Science](#)
8. [Foster a Quality Culture](#)
9. [Protect our People, Assets, and Environment](#)
10. [Ask Questions, Raise Concerns](#)

Our Responsibilities

1. Do The Right Thing Always

We do the right thing by following the laws, regulations, industry codes, policies and procedures that govern our business.

As a global company, we are subject to many different laws and regulations, and it can be hard to keep track of them all. Our Code of Conduct and supporting policies and procedures serve as our guide to compliance requirements, behavioral expectations, and ethical decision making. Everyone is expected to follow these Responsibilities and stay true to our values of integrity, respect and excellence.

The Code offers comprehensive guidance, but it is impossible to foresee every situation that may arise in our global business. We expect

everyone to use good judgment, exercise ethical decision making and ask for help. Furthermore, there may be differences between our Code and the various legal requirements that apply to our worldwide operations. If you become aware of something that should be added to the Code, or a potential conflict between our Code and other legal requirements, please contact the Ethics and Compliance team at Elanco_ethics@elancoah.com.

Throughout our Code, you will learn about Elanco's policies, where to find more information, and how to raise concerns.

Q&A

Who does our Code apply to?

Our Code applies to everyone in our company, at every level, including employees, managers, board members, subsidiaries, and affiliates. The Code and its Responsibilities guide every decision and every interaction on behalf of Elanco – both internally and externally. We expect third parties with whom we do business, including distributors and suppliers (collectively our “Business Partners”), to conduct business ethically. Obligations for our Business Partners are set out in our [Business Partner Code of Conduct](#). We expect employees working with our Business Partners to hold them accountable to the Business Partner Code of Conduct and our values.



Ethical Decision Making Guide

Our business is global and complex. Employees should use judgment regarding the varied considerations across geographical regions, diverse product offerings and regulations and unique customer challenges. To help guide your decision making, remember to ask yourself these questions:

- Is this action aligned with our values and Behavioral Pillars?
- Is this action aligned with our Code of Conduct and policies and procedures?
- Does this action follow the law?
- How will my decision impact Elanco's reputation, my colleagues, customers, business partners and community?

If you are unclear on any of these questions, this is not an excuse to ignore them. Remember, your Manager and the Ethics and Compliance and Legal teams are always available to help. If you have questions, please reach out to the Ethics and Compliance team at Elanco_Ethics@elancoah.com or Legal Function at ElancoLegal@Elancoah.com.

Our Responsibilities

2. Conduct Business Ethically

We conduct business with integrity, comply with all legal requirements and uphold ethical standards. To state it simply – we do the right thing, every day.

The [Conducting Business with Integrity Policy](#) and its corresponding procedures affirm our commitment to conducting business ethically and provide practical guidance to our employees. Although the procedures cannot cover every scenario an employee may face, they offer guidance for employees as they interact with others on behalf of Elanco.

Interactions involving the exchange of value, such as money, goods, or services, are an essential aspect of our business. These interactions enable Elanco to distribute products and communicate information related to innovations and advancements that improve animal health and well-being. All interactions involving value transfers must be conducted with transparency, accountability, and integrity.

Our Commitment to Fair Competition

We believe in free markets and fair competition and we compete fairly and honestly to win business. We comply with anti-trust and competition laws in all places where we conduct business. We do not enable, encourage or engage in unfair methods of competition or deceptive acts or practices. Employees must not participate in any price fixing activities or discussions with a competitor on profit margin, costs, bids, market share, distribution practices, terms of sales, boycotts or blacklists. If you witness discussions or agreements such as these or have a question about a competition issue, please contact the ethics and compliance team at Elanco_ethics@elancoah.com or the legal function at ElancoLegal@elancoah.com.

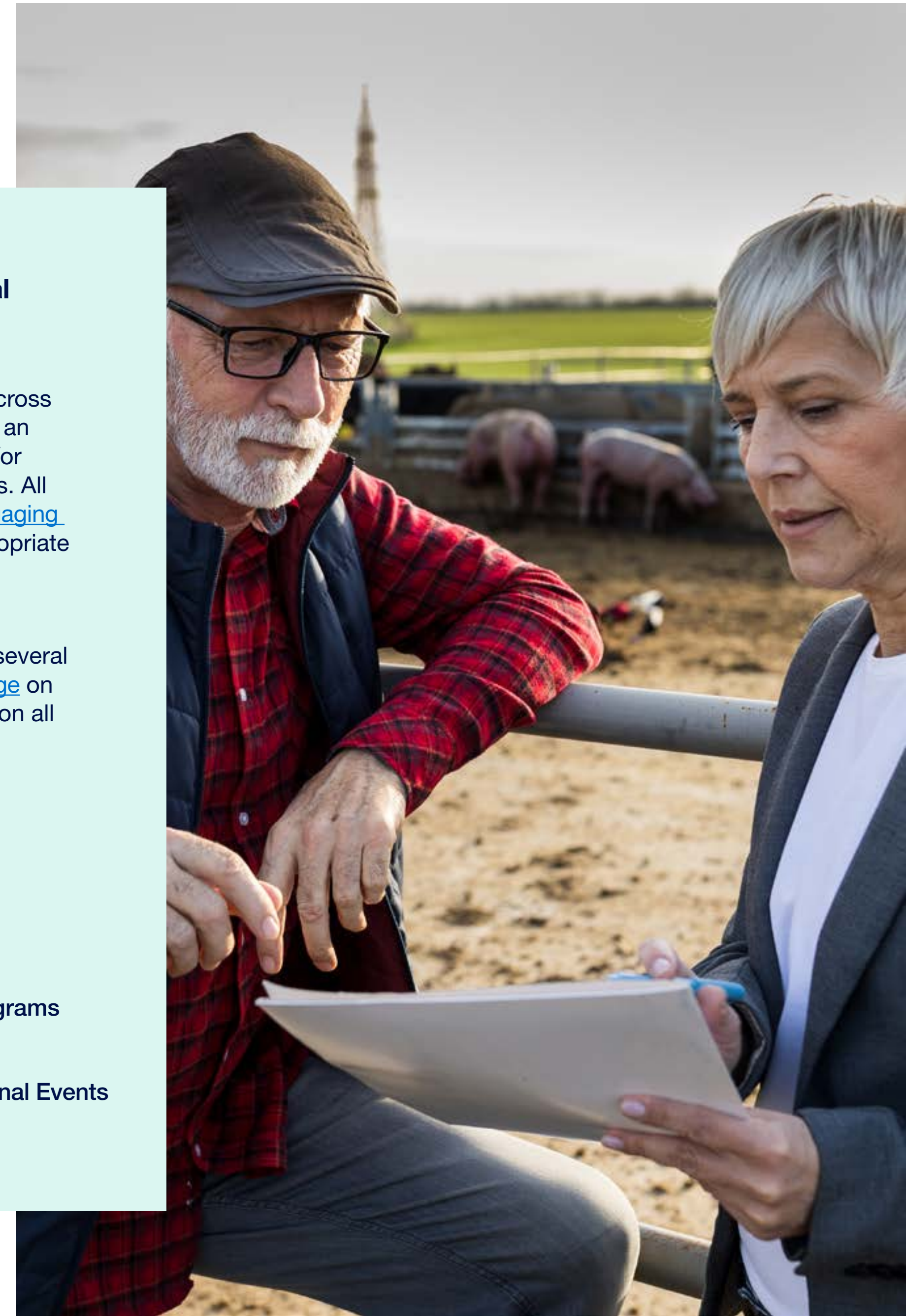


Are you hiring an Animal Health Professional to serve on an advisory board or speak on Elanco's behalf?

We work with Animal Health Professionals (AHPs) across many Elanco functions and geographies. An AHP is an individual who prescribes, recommends, treats and/or performs clinical services in the treatment of animals. All AHP engagements must be approved using the [Engaging an AHP Procedure](#) to ensure transparency and appropriate documentation.

In addition to the Engaging an AHP Procedure, our Conducting Business with Integrity Policy includes several relevant procedures. The [Ethics and Compliance page](#) on The Spot, our Company intranet, offers information on all compliance policies and procedures, including:

- Charitable Contributions
- Commercial Sponsorships
- Educational and Research Grants
- Elanco-Organized Meetings and Events
- Free Goods and Samples
- Gifts, Prizes, Contests, and Other Incentive Programs
- Meals, Entertainment, Hospitality
- Support for AHPs to Attend Third-Party Educational Events



Our Responsibilities: Conduct Business Ethically (cont.)

Anti-Bribery and Anti-Corruption

We comply with all laws that prohibit bribery and corruption. Our [Anti-Bribery and Anti-Corruption Policy](#) affirms that we do not offer, provide, authorize, or accept anything of value – or give the appearance that we do – to inappropriately influence a decision or create an unfair advantage. We always ensure that our interactions, and those of our third-party intermediaries, with government officials, customers, and others comply with applicable laws and our Code.

Elanco often engages third parties, such as distributors, to conduct business on Elanco's behalf. It is critical that these third-party intermediaries (TPIs) conduct business in a way that is consistent with our values and aligned with our policies. Elanco has an [Anti-Corruption Due Diligence Procedure](#) that specifies how we confirm that TPIs will conform to Elanco's expectations for ethical behavior. For questions concerning our Anti-Corruption Due Diligence Procedure, please contact the Ethics and Compliance team at acdd_elanco@elancoah.com.

All TPIs must follow the [Business Partner Code of Conduct](#), which sets forth our expectations for ethical business conduct.



What would you do?

Elanco has been working with a government official on obtaining approval for a new drug in several countries. This drug will revolutionize the market, and we need approval as swiftly as possible. While we await approval, a co-worker suggests that we invite the government official and her spouse to an expensive dinner to celebrate the upcoming holiday season. Is this allowed?

No, our Anti-Bribery and Anti-Corruption Policy prohibits giving anything of value to improperly influence a decision or gain an undue business advantage. If you become aware of any potential benefit or gift to a government official, you must stop and contact your regional Ethics and Compliance leader.

Conflict of Interest

A conflict of interest can exist when an individual has a financial, professional, or other personal interest that directly or indirectly affects (or has the appearance of affecting) their professional judgement and responsibility to act in the company's best interest. Examples of conflicts of interest include, but are not limited to:

- A financial interest in a competitor, customer, or supplier.
- Employment outside of Elanco that could negatively impact an Elanco worker's performance.
- A personal relationship with a third party or Elanco employee that could influence or appear to influence an employee's execution of their responsibilities.

To learn more about our [Conflicts of Interest Policy](#), visit our [Ethics and Compliance page](#) on The Spot.



What would you do?

You are on the Elanco team that has been tasked with finding a new supplier for our Pet Health business. Your spouse's company has submitted a proposal to win this new work. You think they would be a great fit and could help Elanco. What should you do?

When an individual is involved in the decision making process to award business to a family member, this creates a conflict of interest and it should be disclosed. If you are aware of a potential conflict of interest or are unsure if a situation presents a conflict – either real or perceived – you can seek guidance through the [Conflicts of Interest Platform](#). The Ethics and Compliance team will review the facts and provide guidance on how to proceed.

Our Responsibilities

3. Respect Each Other Always

We foster an inclusive workplace where all colleagues are respected. We comply with fair employment practices and value diversity of thought, backgrounds, experiences, skills and perspectives.

Our workplace is an environment where our people feel valued and are given opportunities to grow and meet their potential. We promote equal opportunity for all and have zero tolerance for discrimination on the basis of race, color, age, pregnancy status, gender, sexual orientation, gender identity or expression, national or ethnic origin, disability, religion, political affiliation, union affiliation, marital status, veteran status or other dimensions of difference protected by law in the jurisdictions where we operate. You can find our anti-discrimination and anti-harassment policies by going to the [HR Homepage](#) on the Company intranet.

Our global [Human Rights Policy](#) outlines the principles and procedures guiding our commitment to human rights as defined by relevant international human rights agreements. We support the human rights of our employees through equal opportunity, a diverse workforce and inclusive culture, relevant training and development programs, a safe and accessible work environment, fair remuneration and quality benefits, and appropriate grievance mechanisms.

Looking beyond our own operations, we expect our Business Partners to uphold human rights in their operations such as health and safety, child and forced labor, and equal opportunity. These expectations are detailed further in our [Business Partner Code of Conduct](#).



What would you do?

You recently joined Elanco's research and development team and you are part of a large global team. Your supervisor has started making disrespectful comments about several team members. You are uncomfortable with the comments and they are negatively impacting the team. You aren't sure if you should say something. What should you do?

All employees have a responsibility to foster a culture of integrity and respect for others. You should raise your concerns with a member of management, Human Resources or the Ethics and Compliance team. Elanco provides a safe environment to speak up and does not tolerate retaliation in any form against anyone who reports a known or suspected violation in good faith or who participates in an Elanco investigation. To learn more about how to report a concern, [click here](#).



An inclusive organization is a key ingredient to Elanco's future. We need diverse thoughts and talents across all levels of the company to successfully achieve our strategy.

Jeff Simmons, President and CEO

At Elanco, we strive to create an inclusive culture where we value, respect and celebrate diversity in our global employee family. Employee Resource Groups ("ERGs") serve as a resource for a group's unique needs, a community to celebrate dimensions of difference and a change catalyst to drive the inclusive culture that we promise to employees. These groups support community development and business growth throughout the organization.

You can learn more about ERGs and our commitment to inclusion, diversity, equity and accessibility by visiting our [Inclusion, Diversity, Equity and Accessibility \("IDEA"\)](#) resources page on the company intranet.

Our Responsibilities

4. Respect Privacy and Safeguard Information

We safeguard all personal and confidential information entrusted to us, whether it is that of a customer, consumer, Business Partner, employee, or any other individual. When we have a business need for personal information, we're intentional about protecting it and are open and honest about how we collect, manage, use, and disclose it.

The [Global Privacy Policy](#) sets forth our commitment to privacy and outlines the privacy principles that govern Elanco's collection, use, storage, disclosure, and other processing of personal information. Our global privacy program supports compliance with all laws and regulations and ensures we protect confidential and personal information in the countries where we operate. Elanco takes its obligation to protect this information seriously and only uses data in accordance with our policies and procedures. For more information on our Global Privacy Policy and other procedures that support our privacy program,

please visit the [Privacy Hub](#) on the Company intranet. If you have questions or would like to report an actual or suspected privacy incident or concern, please contact privacy@elancoah.com or make a report through the IntegrityLine.

The Elanco Information Security program protects our networks, systems, services and technology. We require third parties who process information on our behalf to implement appropriate security controls that meet our standards. Whether sharing information internally or externally, all employees must classify, label, store and share in accordance with the [Elanco Information Handling Guide](#).



What would you do?

You just joined the sales team at Elanco after working for several years for another company in the animal health industry. Are there any restrictions on your use of information that you learned at your previous company to help you be successful at Elanco?

Yes. While you can use the general skills and knowledge you have developed through prior employers, it is important that you do not use any confidential information or trade secrets from other companies while working at Elanco. Please consult the confidentiality agreement that you signed when you began work at Elanco or contact the Legal Function at ElancoLegal@elancoah.com if you have any questions.



Our Responsibilities

5. Ensure Financial Integrity

Elanco routinely discloses information to all relevant stakeholders that is necessary to present an accurate picture of the Company's financial status and to ensure the effective running of the business. We employ internationally accepted accounting standards and practices to ensure our books and records accurately represent our business.

The integrity of our financial records and information is critical to our success and to maintaining the trust of our shareholders and other stakeholders. Ensuring financial integrity extends to all Elanco employees, not just those preparing our formal financial disclosures. Ensuring accuracy in invoicing, expense reporting, time and benefit records, and other day-to-day tasks is important for all of us. We obtain all necessary approvals before committing funds on behalf of Elanco – and we follow all internal processes, controls, and accounting principles. We ensure that our records accurately, fairly, and completely reflect all transactions. Every Elanco employee should immediately report any known or suspected unrecorded assets or liabilities or false or fraudulent entries recorded within our books and records.

You may report these concerns to a member of management, Human Resources or the Ethics and Compliance team.

Before committing Elanco funds or resources, all employees must follow Financial Responsibility and Authorization Procedures (FRAP) which serve as a framework to assist employees in making sound financial decisions on behalf of the company. This procedure ensures that all transactions are appropriate, lawful, and consistent with our company policies. While all employees have a duty to exercise financial integrity, financial officers at Elanco hold an important and elevated role in corporate governance. The [Financial Code of Ethics](#) outlines principles and responsibilities for these employees and guidance on how to carry out their duties with honesty and integrity.



What would you do?

You have been asked by your supervisor to hold a large supplier invoice until next quarter so that the team can meet its current financial targets. What should you do?

If the goods or services have been received, the expense must be accrued now and you cannot hold the invoice. All revenue and expense reporting must occur in the correct accounting period. If you have questions about how to appropriately record expenses or invoices, please contact your manager or local Finance leader.

Elanco maintains Global Finance Standards that are meant to provide guidance for most accounting and finance situations; however, the standards cannot predict every situation that may occur. Individuals must contact Elanco's Corporate Accounting and Reporting team in the event of a question impacting the appropriate recording or reporting of a financial transaction.



Our Responsibilities

6. Communicate Honestly

As a publicly traded company, it is critical that we are honest, accurate, and transparent when sharing information internally and externally.

We are committed to delivering timely, accurate and reliable information both internally and externally. As a publicly traded company, we are subject to regulations for our external or public disclosures. Only authorized individuals at Elanco should speak to the media or answer questions from financial analysts or investors.

Elanco employees may have access to non-public information such as information about mergers and acquisitions, sales or earnings results, financial forecasts, changes to management structure or pending legal matters. All employees must avoid sharing non-public information with anyone outside of Elanco.

Employees should consider these questions when communicating with stakeholders:

Who?

Who is asking for this information? Only authorized individuals at Elanco should speak to the media and financial analysts.

What?

What is being asked? Questions about Elanco's business should only be answered by authorized individuals.

Why?

Why does this information need to be shared? What is the benefit?

Where?

Where will the information be shared? If you are sharing information on your personal social media page, consider the questions above. If the information will be shared by a third party, contact the Corporate Communications team.

You can find additional guidance on external communication in the Communicating Externally Policy and the [Global Procedure for Using Social Media Policy](#).



What would you do?

During a team meeting, you learn that Elanco is planning on selling a part of our business to a competitor. Can you purchase stock in the competitor before the deal is announced? What about buying more Elanco stock?

No. If you learn that Elanco is considering selling or buying a business or entering into a contract to do so, you must assume the information is non-public until the transaction has been announced to the public. The [Elanco Prohibited Insider Trading Policy](#) prohibits the direct or indirect buying or selling of Company securities if you are aware of material, non-public information about the Company. There is no bright-line standard for assessing whether information is material, but as a general rule, you should consider material information as any information that a reasonable investor would consider important in making a decision to buy, hold, or sell securities. Questions about this policy or any proposed transaction should be directed to the Legal Function at ElancoLegal@elancoah.com.



Our Responsibilities

7. Relentlessly Pursue the Best Science

We innovate through high-quality, robust research to provide game-changing products for animals and the people who care for them.

At Elanco, we leverage internal and external scientific resources to pursue the best methodologies throughout the life cycle of our products - from initial concept to monitoring of our products in the marketplace. We believe animal welfare is integral to the environmental and social sustainability of global communities. We respect animals and are dedicated to safeguarding the welfare of livestock, pets, and research animals worldwide. Elanco's animal welfare guidelines and practices promote animal well-being and responsible use of research animals in the development of our innovative products.

Animal-based research is fundamental to driving innovation and improving welfare outcomes for all animals. [Elanco's Animal Welfare Policy](#) sets out how we safeguard the welfare of our research animals, and our commitment to meeting or exceeding regulatory requirements for animal welfare across every aspect of our research. We only work with research partners that meet our high standards of care. To learn more about our commitment to animal welfare, please email Animalwelfare@elancoah.com.



What would you do?

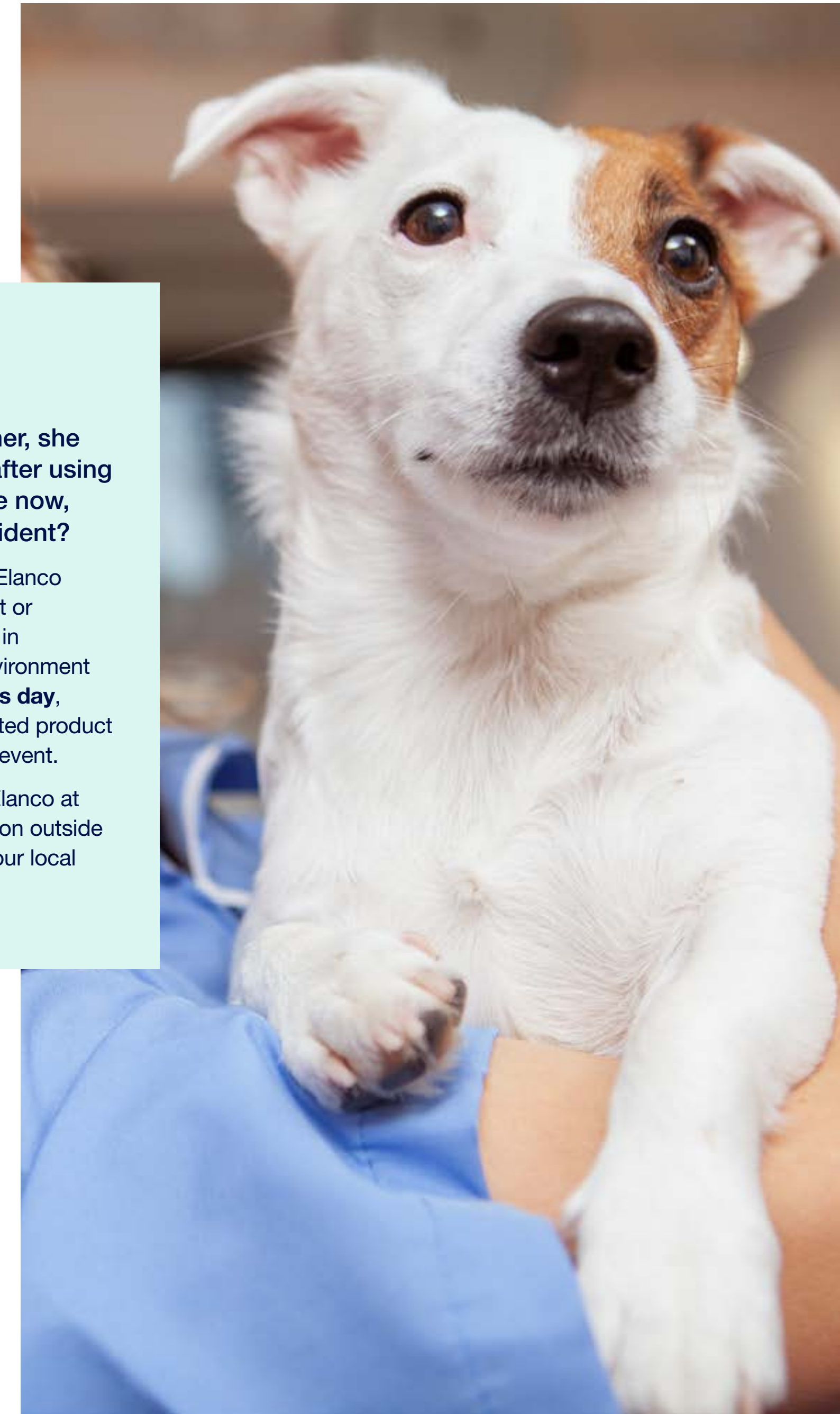
While meeting your friend for dinner, she tells you that her dog became ill after using an Elanco product. The dog is fine now, but do you need to report this incident?

Yes, you should report this incident. All Elanco employees must report all adverse event or product complaint information, whether in humans or animals, or related to the environment or residues in food, **within one business day**, regardless of whether the Elanco marketed product is considered to be associated with the event.

To report within the United States, call Elanco at +1-800-428-4441. For contact information outside the United States, [click here](#) or follow your local reporting procedures.

Our Commitment to advancing farm animal welfare

At Elanco, we believe that a culture centered on people and animals is core to upholding optimal farm animal care, as well as the long-term success and sustainability of animal agriculture. Ensuring a positive state of animal welfare is the right thing to do, which in turn is the basis for the health and productivity of farm animals. Beyond being an innovative animal health company, Elanco is an enabler dedicated to collaborating with the stewards of farm animal care to advance the science of animal welfare in practical ways.



Our Responsibilities

8. Foster a Quality Culture

We deliver a high-quality, reliable product supply every time. We ensure accurate and complete product, safety, and efficacy information.

Quality is a core element of our values and our commitment to customers. Elanco has designed a Quality Management System (“QMS”) to provide appropriate oversight for the animal health product portfolio and services based on applicable animal health regulations and good scientific principles. The QMS describes requirements for the appropriate level of control to protect the treated animal, the people administering the products, as well as the environment and the Elanco brand.

At Elanco, quality is everyone’s responsibility, and all employees apply robust quality standards at every stage of research, development, manufacturing and distribution. We foster a culture of identifying and implementing opportunities for continuous improvement in product quality and safety, with active engagement of all individuals at all levels of management. Elanco incorporates regulatory requirements from around the world into the Elanco Global Standards and business processes. We collaborate closely with regulatory authorities in countries where our products are marketed to ensure compliant registration.



What would you do?

During a team meeting, you learn that Elanco is implementing a change in our production schedule to meet high customer demand for upcoming product launches. Implementing this change at your site will mean long hours and a lot of work for the entire team. Your manager tells you not to worry about all the Elanco change control procedures because he has developed his own system to implement the changes at a faster pace. What should you do?

Quality is everyone’s responsibility, and you must speak up about this potential deviation from our standard operating procedures. The Elanco Quality Manual contains procedures and documentation requirements to ensure that Elanco’s continuous improvement activities are done in a manner that involves all appropriate parties and considers all potential impacts. These processes must be managed in accordance with the Quality Manual so that we can meet current and future customer needs and requirements, in line with our Elanco values and quality standards.



Elanco Quality Manual

Quality is a core element of Elanco’s values and commitment to deliver on our promise to customers.

- Our focus is on customers: We discover, develop, and deliver innovative, quality products to enrich lives through food and companionship.
- Quality creates value for stakeholders: We provide quality products, processes, and services to achieve competitive advantage.
- Quality is everyone’s responsibility: We act with integrity, driven by respect for our customers, animal health, the environment, regulatory authorities, and each other.

Our Responsibilities

9. Protect our People, Assets, and Environment

Our workplace promotes the safety and security of our people, assets, and the communities where we operate and serve.

We are committed to protecting our people and brand from harm, and our assets from loss, theft, or damage. We continuously improve our health and safety practices to promote the well-being of our people and to create a secure working environment for our visitors and business partners. We strive to make the communities where our people live and work better.

Elanco's Healthy Purpose™ is our global approach to environmental, social, and governance (ESG) issues relevant for our business. Elanco's Healthy Purpose is a framework of commitments and actions built on four interconnected pillars: Healthier Animals, Healthier People, Healthier Planet, and Healthier Enterprise – which represent the areas we believe are most important to our customers, employees, investors, and other stakeholders.

We manage our environmental footprint and leverage product and service innovations to help our stakeholders advance their own sustainability efforts. We integrate the management and oversight of ESG issues throughout our operations.

Learn more about how we are making progress against our Healthy Purpose pillars on our [sustainability website](#).



What would you do?

Construction repair activities are occurring at your facility. While at your workstation, you are asked to get work-related supplies that will require you to walk through the construction area. You are unsure of the specific repairs that are being done, but it will only take a few minutes to get what you need and return to your workstation. Surely any major hazard would be blocked off or have clear signs to warn you. Should you walk through the area to get what you need?

No, you should always stop, speak up and ask questions if you are unsure of the situation. Find someone familiar with the construction area and ask about the risks in the area and the measures you should take to protect yourself. These measures may include specific personal protective equipment, utilization of the identified pedestrian path or education regarding potential trip hazards. Do not proceed until you have a full understanding of the hazards and how to protect yourself. Whether it is a construction zone, a machine you work with, or a task you are required to do as part of your daily work, these same guidelines apply to keep you safe and protect yourself and others from harm.



Our Responsibilities

10. Ask Questions, Raise Concerns

We don't compromise on our values of integrity, respect and excellence. We recognize that asking questions and raising concerns is our right and responsibility, knowing that Elanco does not tolerate retaliation.

We foster a culture of integrity and doing the right thing in the right way. We encourage employees, contractors, and suppliers to report any known or suspected violation of our Code, policies, procedures, or laws that regulate our business without fear of retaliation.

[Our Speak Up: No Retaliation Policy](#) provides several methods to report concerns:

You can raise a concern with a member of management, Human Resources or the Ethics and Compliance team. Any individual, including suppliers and other third parties, can raise a concern through Elanco's IntegrityLine which is available 24 hours a day, seven days a week.

How can someone raise a concern through the IntegrityLine?

Elanco's IntegrityLine is an accessible and confidential way to report issues, concerns, or behaviors that could harm Elanco or those we serve. Concerns may be raised anonymously through IntegrityLine, and translation services are available in most languages.

IN THE U.S. AND CANADA

Call 1-866-921-6714 or file a report online at www.integritycounts.ca/org/elanco.

OUTSIDE THE U.S. AND CANADA

Go to www.integritycounts.ca/org/elanco and select the "Call the IntegrityLine" icon. Select the applicable telephone number for the country or submit your report online.



The Importance of Setting an Example for Others

Managers play an important role at Elanco. Individuals who supervise others have a responsibility to foster a culture of compliance by:

- Role modeling ethical behaviors and what it means to Do It Right.
- Fostering an inclusive work environment where employees feel free to ask questions and raise concerns.
- Reporting potential violations of this Code, our policies or applicable laws immediately.
- Recognizing employees who model our commitment to integrity and set an ethical example for others.

Our Responsibilities: Ask Questions, Raise Concerns (cont.)

We Prohibit Retaliation

Elanco provides a safe environment to speak up and does not tolerate retaliation in any form against anyone who reports a known or suspected violation in good faith or who participates in an Elanco investigation.

While we hope you feel confident using the mechanisms that we offer for reporting concerns, no Elanco policy or procedure prohibits you from reporting potential violations of any law or regulation to any government agency directly.

Q&A

What are some examples of retaliation against somebody for raising a concern?

Retaliation can take many forms. These may include, but are not limited to:

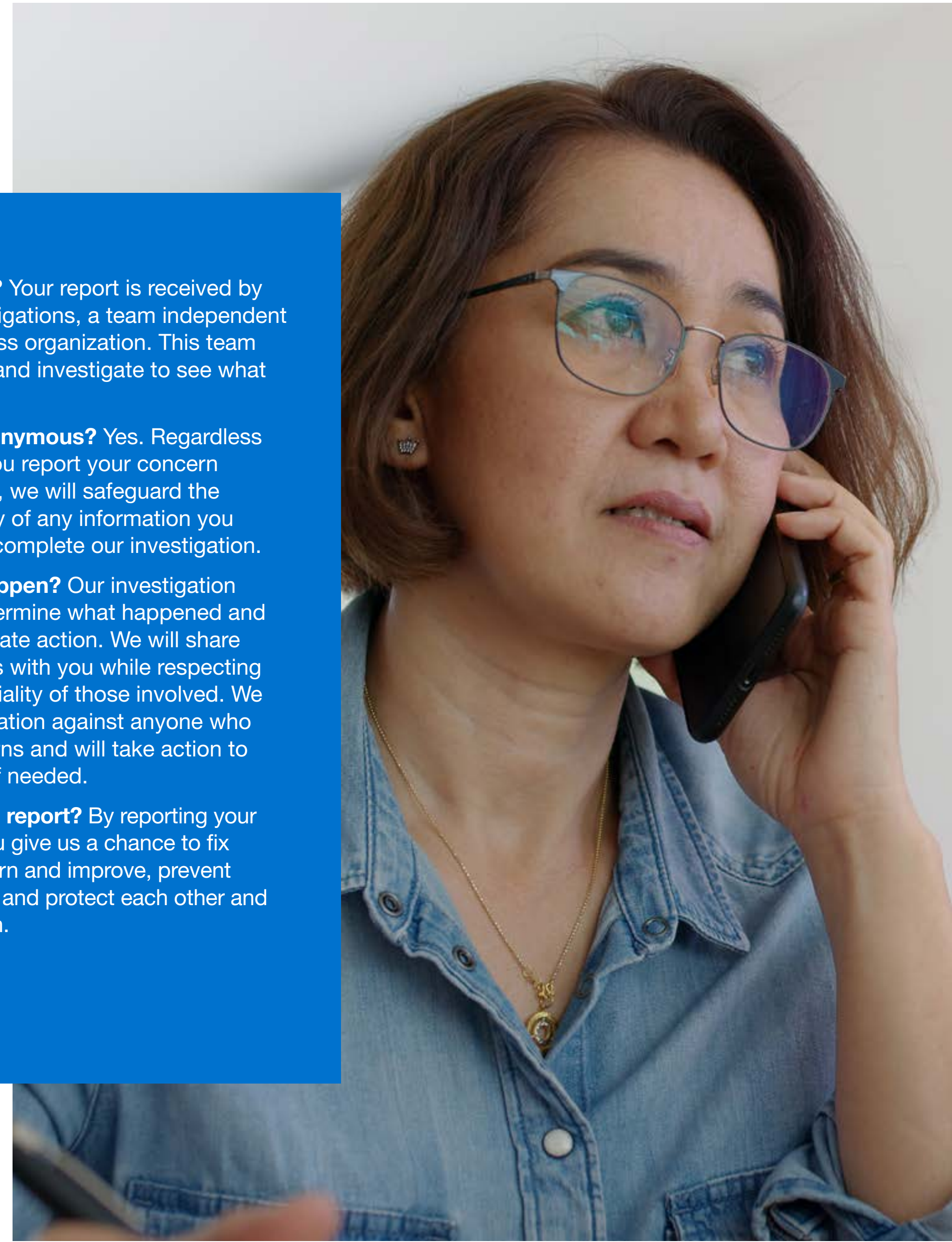
- Terminating, reprimanding or disciplining an employee.
- Transferring a worker to a lower-level position or passing the worker over for development opportunities.
- Changing the work schedule of a worker or other actions to make their work more difficult.
- Excluding a worker from team meetings or team lunches.

Please consult the [Speak Up: No Retaliation Policy](#) for more information.

What happens when I report a concern?

When you speak up, we take it seriously and review it in a thorough and timely manner. Common questions about our process include:

- **Who sees it?** Your report is received by Global Investigations, a team independent of the business organization. This team will review it and investigate to see what happened.
- **Can I be anonymous?** Yes. Regardless of whether you report your concern anonymously, we will safeguard the confidentiality of any information you share as we complete our investigation.
- **What will happen?** Our investigation team will determine what happened and take appropriate action. We will share the outcomes with you while respecting the confidentiality of those involved. We prohibit retaliation against anyone who raises concerns and will take action to enforce this if needed.
- **Why should I report?** By reporting your concerns, you give us a chance to fix problems, learn and improve, prevent future issues, and protect each other and our reputation.



Want to Learn More?

Elanco employees can find the Code of Conduct in multiple languages and links to our major compliance policies and procedures by going to the [Ethics and Compliance page](#) on The Spot, our Company intranet.

The Ethics and Compliance and Legal teams offer training on our Code, guidance on following our compliance policies and procedures, and advice on integrating these Responsibilities into your work.

To learn more or to request additional training, please reach out to Elanco_Ethics@elancoah.com.



