



Purpose

At Elanco, we foster a culture of integrity and doing the right thing in the right way. We recognize that asking questions and raising concerns—including anonymously—is our right and responsibility, knowing that Elanco does not tolerate Retaliation. This Policy (the “Speak Up Policy”) outlines the process for reporting concerns or potential violations of the Code of Conduct and/or any Ethics & Compliance policies and procedures, and it confirms Elanco’s commitment to prohibiting Retaliation for making or participating in the investigation of those reports.

Scope

The Speak Up Policy applies to all Elanco Workers.

The Speak Up Policy is not intended to cover topics where other reporting processes are more appropriate. Below is an exemplar list of in scope and out of scope topics:

In Scope	Out of Scope
Ethical Concerns or Issues	Lost or Stolen Device
Improper Conduct (e.g., abuse, harassment)	Employee Performance and Employee Benefits
Compliance (e.g., violation of the Code of Conduct or policy)	Health and Safety Emergency or Crisis
Distribution of expired products or tampered-with products	Adverse Events or Product Complaints
Books and Records misrepresentations	Potential phishing emails

Definitions

Customer. A Third Party that purchases Elanco products and/or receives services.

Elanco. Elanco Animal Health Incorporated, and all of its subsidiaries and affiliates.

Elanco Worker. Elanco employees and designated contractors engaged by or on behalf Elanco.

Retaliation. Any kind of intentional negative action against an individual because the individual reported or participated in an investigation of a reported concern.

Policy

We encourage all Elanco Workers, Customers, and/or suppliers to promptly “speak up” and report any known or suspected violation(s) of our the Code of Conduct and/or any Ethics & Compliance policies and procedures without fear of Retaliation. Even if you do not have all the information or are unsure the concern is valid, “speaking up” lets Elanco appropriately address the situation in a timely manner. Critically, “speaking up” allows Elanco to maintain our reputation and trust with our Customers, suppliers, and other third parties, and furthers a safe and productive working environment.

Our Speak Up Policy covers suspected violations involving misconduct and non-compliance with our Code of Conduct. Some common situations involve:

- Environmental, health and safety issues
- Misrepresentation in books and records
- Unlawful access to or use of data or other Elanco property
- Discrimination, harassment, and bullying
- Lying during an investigation
- Human or animal rights violations
- Anti-competitive practices
- Retaliation against someone for “speaking up”

We expect managers to promptly report concerns that are relayed to them by subordinate Elanco Workers and to report all suspected compliance violations. Subject to local laws and regulations, a manager’s failure to report a suspected compliance issue may result in discipline, up to and including termination of employment, depending on the seriousness of the violation.

How to Raise a Concern

- Elanco Workers can raise concerns with a member of management, Human Resources, or a member of the Ethics & Compliance (“E&C”) team.
- Any Elanco Worker or any person, including suppliers and third parties, can raise a concern through Elanco’s established reporting channel, [IntegrityLine](#), which is available 24 hours a day, seven (7) days a week by telephone or online. It is a convenient, confidential, and anonymous way to report issues, concerns, or behaviors that could harm Elanco or those we serve.

Elanco respects the confidentiality of the person(s) reporting the violation and discloses the report and the reporter’s identity (if provided) only on a “need-to-know” basis consistent with applicable law. No Elanco policy or procedure prohibits an Elanco Worker from reporting potential violations of any law or regulation to any government agency.

Duty to Cooperate

It is the responsibility of every Elanco Worker to cooperate in an investigation. This duty is aligned with doing the right thing and protected by Elanco’s Speak Up Policy.

No Retaliation

Elanco provides a safe environment for persons to “speak up” and to participate in investigations. Elanco does not tolerate Retaliation in any form against persons who report a known or suspected violation in good faith—meaning the reporter had a reasonable, good-faith belief that a violation may have occurred—regardless of whether a violation is ultimately found to have occurred. Likewise, Elanco does not tolerate Retaliation in any form against persons who participate in an Elanco investigation.

Examples of Retaliation include, but are not limited to, taking the following action as a result of a report:

- Threatening an individual in any capacity (orally, in writing, or via electronic means)
- Reprimanding or disciplining an Elanco Worker
- Giving a poor performance evaluation to an Elanco Worker
- Transferring an Elanco Worker to a lower-level position
- Passing over an Elanco Worker for development opportunities
- Changing the work schedule of an Elanco Worker
- Making an Elanco Worker’s work significantly more difficult
- Spreading false information about an individual



Speak Up: No Retaliation Policy

Global Policy

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- Excluding an Elanco Worker from participating in teams, meetings, projects, etc. with no business justification and in which the Elanco Worker should reasonably be involved based on their role and responsibilities

If you believe you have been subjected to Retaliation, please reach out to the global E&C team by using the contact information below:



Elanco_Ethics@elancoah.com

Related Policies and Resources

Code of Conduct

Approvals

Approver	Chief Ethics and Compliance Officer	Owner	Head of Ethics and Compliance
Last Approved	5/19/2023	Policy Area	Ethics and Compliance
Effective	11/21/2022	Applicability	Global
Last Revised	4/11/2023	Next Review	