Elanco Business Partner Code of Conduct

As a global U.S. publicly-traded animal health company, Elanco works in a complex legal and regulated environment. Elanco employees, together with its suppliers and third parties, have a shared responsibility to act legally, ethically and abide by the Elanco values of Integrity, Respect and Excellence.

Elanco recognizes that our overall success depends on our business partners. The Business Partner Code of Conduct provides both suppliers and third parties working on Elanco’s behalf a set of expectations when conducting Elanco business. The Code of Conduct is only as effective as the efforts our suppliers and third parties put into enforcing it. Third party business contacts are responsible for ensuring their employees are aware and comply with the Code.

Elanco expects that our third parties will also hold their suppliers and other third parties to the same standards, and as such this Code also applies to affiliates and subcontractors of Elanco’s third parties and to their respective facilities to the extent those facilities supply goods and services for ultimate sale to or use by Elanco. As a Company with global operations, we are committed to following the laws and regulations applicable to the locations in which we operate. Where this Code differs with local laws, we aspire to follow the higher standards unless actions required by the Code are prohibited by local law. Compliance with the Code and applicable laws are the minimum standard of conduct.

If you have any questions or concerns regarding our Business Partner Code of Conduct, we encourage you to contact your Elanco business contact, the Elanco Integrity Line or Elanco_ethics@elanco.com.

Interactions:

- Do the right thing by following the laws, regulations, industry codes, policies and procedures that govern our business.
- Behave ethically in business relationships, dealings, and activities. Practice the highest standards of business conduct.
- Do not offer, provide, authorize, or accept anything of value, including gifts of any monetary value – or give the impression that we do – to inappropriately influence – or give the impression that it does – a decision or create an unfair advantage.
- Do not compromise on issues of integrity to gain a business advantage. Compete fairly and honestly.
- Share information with honesty, accuracy and transparency in all areas of external communication regarding Elanco products, business, activities and transactions. Only authorized representatives of Elanco can communicate on Elanco’s behalf.
- Do not allow business dealings to be influenced by personal or family conflicts of interest. Disclose any known or potential conflict of interest between a business partner and an Elanco employee or business partner and an outside/external relationship.
- Select your suppliers of Elanco products based on the merit and value of their materials and services. Do not offer or accept anything that could affect or appear to affect business judgment.
- Only provide information about Elanco products that is approved by Elanco, consistent with the approved product label, and that presents benefits and risks in an accurate, fair, and balanced manner to the appropriate audience.
- Only use Elanco approved promotional and educational materials. Suppliers and business partners shall not alter or create a promotional or educational material for an Elanco product unless contracted to do so.
Workplace:

- Adhere to fair employment practices and value the diversity of thought, backgrounds, experiences, skills and perspectives. We do not tolerate inappropriate conduct such as discrimination, harassment or retaliation.

- Maintain a workplace that promotes the safety and security of people, assets and the communities in which we operate and serve.

- Consistently deliver a high quality, reliable product supply, assuring accurate and complete product, safety and efficacy information.

- We expect that our suppliers will source their materials responsibly and abstain from procuring materials from areas or sources that might promote conflict in high risk countries or that directly or indirectly finance or benefit perpetrators of human rights abuse.

- We expect that our suppliers conduct their own due diligence regarding the source of any materials they provide to us in order to ensure those materials are obtained from areas that are conflict-free.

- Respect and protect the welfare of animals used in commercial settings and in research, complying with all legal and Elanco requirements that govern the care and use of animals. If you have animal welfare concerns, contact Elanco immediately at \texttt{Elanco_ethics@elanco.com}

- Elanco adheres to the OECD guiding principles for human rights and expects all business partners to abide by these guidelines and local laws, when applicable, regarding modern slavery, child labor, forced labor and other rights.

Information:

- Respect privacy and responsibly protect the Elanco Company Information entrusted to you, whether it belongs to customers, third parties, employees, consumers or any other individual.

- Take reasonable precautions to protect Elanco Company Information against loss, theft, misuse, unauthorized access, disclosure, alteration, or destruction.

- Safeguard and make proper use of Elanco Company Information as a valuable asset. Elanco Company Information is any Elanco information, including privacy information that has not been approved for public disclosure by Elanco. Elanco owns and retains the right to access Elanco Company Information regardless of how, why, where, or by whom it is produced.

- Use appropriately secure electronic services and tools with due consideration for the sensitivity of the Elanco Company Information being stored, communicated, or transferred and the potential risks of the information being lost or exposed.

- Protect all Elanco Company Information generated by Elanco or a supplier from disclosure to any person or company who does not have authorization to receive this information. Follow processes for the handling and disclosure of Elanco Company Information (whether written, oral, or electronic).
Transactions:

- Employ internationally accepted accounting standards and practices to ensure our books and records are created and maintained as an accurate representation of Elanco transactions.

- Do not make, arrange to have made, or fail to correct or report any false, misleading, or artificial entries in Elanco records or those of others with whom we do business.

- Obtain appropriate authority and secure the required Elanco approvals before acquiring or committing Elanco resources, entering into agreements with external parties, disbursing Elanco funds, and/or entering into transactions.

- When involved in contracting, verify the contract accurately reflects the nature, value, and content of the proposed Elanco transactions and relationship. Discuss with your Elanco contact any instances of observed conduct or circumstances that are inconsistent with applicable contractual requirements.

- Properly classify and value goods and technology and meet all applicable import and export requirements and restrictions before transferring them either electronically or physically (whether by sending or personally carrying them) between countries.

- Do not take any action that would support or respond to a request relating to a boycott of a country that is friendly to the United States. We follow applicable reporting and approval requirements for all requests received, even if Elanco does not intend to respond to or comply with the request.

- Do not engage in or commit to any Elanco transaction with countries subject to trade or economic sanctions or with individuals, groups, or entities that we are aware or have reason to believe appear on any government list of restricted, sanctioned, denied, or debarred parties without first verifying that the transaction is permissible.

Reporting:

- Don’t compromise on issues of integrity. We recognize that asking questions and raising concerns even if anonymously is our right and responsibility knowing that retaliation is not tolerated.

- If you observe actions that are not aligned with these commitments, Elanco wants to know so that we can learn and improve. Report all known or suspected violations and immediately report any concerns or potential breaches of personal information to Elanco sponsors, Elanco Integrity Line, or Elanco_Ethics@elanco.com

- Report any known or suspected adverse events or product complaints within a timely manner by calling 1.800.428.4441 or 1.888.545.5973.

- An adverse event is any unfavorable or unintended observation that occurs after any use of an Elanco product (on-label or off-label uses) no matter if the response is thought to be product related or not. Included is suspected lack of expected efficacy or noxious reaction in humans after being exposed to the product.

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