

Teva Supplier Code of Conduct

Teva's suppliers are an integral part of the overall success of Teva. Each day, Teva and its suppliers make decisions that impact Teva's ability to provide quality health care products to its customers.

Teva has high standards for conducting business ethically and in accordance with all governmental and industry standards, laws and regulations, as well as Teva's internal policies. Teva expects the same commitment from its suppliers. This Supplier Code of Conduct documents principles and expectations for establishing and maintaining a business relationship with Teva.

Teva is aware of cultural differences and challenges associated with interpreting and applying these principles globally. While Teva believes these principles are universal, Teva understands that the methods for meeting these expectations may vary in order to be consistent with the laws, values and cultural expectations in different countries around the world.

All Teva suppliers are expected to understand and comply with this Supplier Code of Conduct. Teva considers these Supplier Code of Conduct principles when selecting a supplier and Teva reserves the right to monitor a supplier's ongoing compliance with these principles. Teva's suppliers must also apply the same or substantially similar principles toward third parties with whom they work in providing goods and services to Teva. If Teva becomes aware of any actions or conditions not in compliance with this Supplier Code of Conduct, Teva reserves the right to seek corrective action and/or terminate any engagement with such non-compliant supplier.

Suppliers are strongly encouraged to contact a Teva representative with any questions, including inquiries relating to the appropriateness of any activity.

Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity.

1. Business Integrity and Fair Competition

Corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or participate in any other illegal inducements in business or government relationships. Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

Teva expects that suppliers will meet the standards embodied in this Supplier Code of Conduct:

- **Avoiding Conflicts of Interest:** Conflicts of interest arise when a supplier places personal, social, financial or political interests before those of Teva. Suppliers are responsible for avoiding situations that present – or create the appearance of – a conflict between their interests and those of Teva. Whether on a supplier’s engagement with Teva or otherwise, nothing should conflict with responsibilities to Teva.

Teva employees may accept gifts or entertainment as part of the normal business process only to the extent they are permitted under the law, are of nominal value and would not influence or appear to influence Teva’s business decisions. Teva employees do not accept gifts of cash or cash equivalents.

Suppliers shall notify Teva immediately in the event of a potential or actual conflict of interest.

- **Prohibition on Insider Trading and on Use of Non-Public Information:** Suppliers may come across material non-public information about Teva, its customers or its partners during a supplier’s engagement with Teva. Buying or selling the securities of a company while being aware of such material non-public information is considered “insider trading.” Suppliers must not buy or sell any Teva securities or the securities of any other company based on such material non-public information. In addition, suppliers must not provide such material non-public information to anyone else (“tipping”) for personal profit. This restriction applies globally, regardless of the location or residence of the supplier or the location or residence of persons who receive such material non-public information.

Information is considered material non-public information if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to purchase or sell a security.

- **Antitrust, Unfair Competition and Business Intelligence:** Antitrust and competition laws focus on ways to ensure that businesses compete on the basis of quality, price and service. This area of law varies from country to country (and within certain countries, from state to

state). These laws are referred to as antitrust, monopoly, restrictive or unfair trade, competition, price discrimination or cartel laws. In general, they seek to promote fair competition among competitors and occasionally protect small scale competitors. They prohibit, among other things, agreements to fix prices, allocation of markets or customers, participation in group boycotts, and efforts to obtain or maintain a monopoly through something other than competition on the merits.

Fair Dealing – Suppliers shall not attempt to obtain information of or about competitors in an illegal or unfair manner. Accordingly, stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies is prohibited.

- **Anti-Corruption:** Suppliers shall prohibit bribery and corruption. No supplier or anyone acting on Teva’s behalf may offer or pay a bribe, kickback or other improper payment. Suppliers are also not allowed to provide anything of value that is intended to win business, improperly influence a decision, or gain an unfair business advantage – or even appear to do so.

Teva is subject to various anti-corruption regulations and guidelines and, therefore, Teva requires that its suppliers will also comply with the letter and spirit of these global and local directives.

Teva Global Compliance developed a Business Partner Program for Third Party Representatives (TPRs) to help minimize these risks and strengthen the relationships that Teva has with third parties.

Teva’s Business Partner Program defines the expectations of business partners when representing (or acting on behalf of) Teva with Government Officials, political parties, or customers or potential customers. Suppliers deemed to be Third Party Representatives (TPRs) are subject to a Compliance Due Diligence review by Teva Global Compliance. To obtain additional information about this program, email: ThirdPartyProgramGlobal@tevapharm.com or ThirdPartyProgramEU@tevapharm.com.

- **Trade Controls:** Suppliers shall be committed to maintaining compliance with all applicable laws regarding imports, exports, re-exports and diversion of products, goods, services and technical data, including import and customs laws, export controls, economic sanctions, denied parties lists, anti-boycott laws and diversion of products.
- **Protecting Proprietary Information of Third Parties:** Just as suppliers value and protect their own proprietary information and trade secrets, Teva expects its suppliers to respect the intellectual property rights of others. In the course of any engagement between Teva and suppliers, the suppliers may receive sensitive or proprietary information from third parties that is confidential. Suppliers shall respect and maintain the confidentiality of such information.

- **Designing and Maintaining Effective Business Controls; Accurate Reporting:** Suppliers shall be committed to delivering accurate full, fair, timely and reliable information to regulatory authorities, shareholders, customers, healthcare professionals, media representatives, financial analysts, brokers and the general public. Suppliers' internal system controlling financial reports shall be designed to provide reasonable assurance that financial statements for external use are prepared in accordance with generally accepted accounting principles, and fairly present suppliers' financial condition. Suppliers shall provide full and accurate disclosure about its business and its financial condition.

Records must be accurate and complete in all material respects. Suppliers' records must be legible, transparent and reflect actual transactions and payments.

2. Identification of Concerns

Suppliers' workers and service providers should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment.

Suppliers who believe that a Teva employee, or any person or entity acting on behalf of Teva, has engaged in illegal or otherwise improper conduct shall report the matter promptly to Teva's Office of Business Integrity.

Teva's Office of Business Integrity (OBI) is responsible for assessing and investigating reports of misconduct, including those made through the Teva Integrity Hotline. There are multiple ways to report concerns confidentially and without fear of retaliation. Reports can be made directly to the OBI at www.tevahotline.ethicspoint.com or via email: Office.BusinessIntegrity@tevapharm.com.

3. Animal Welfare

Suppliers shall provide humane care and treatment of research animals.

Animal testing should be performed only after consideration has been given to non-animal based test methods, reducing the numbers of animals used, or refining procedures to minimize distress in animals being tested. Use of animals in any testing or process should only occur after alternate methods have been fully explored and rejected. Alternatives should be used wherever these are scientifically valid and acceptable to regulators. If animals must be utilized in testing, these animals shall be treated humanely, with minimized pain and stress.

Contract laboratories and collaborating laboratories must be accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC).

4. Anti-Counterfeiting

In an ongoing effort to work together to secure the supply chain from the dangers of counterfeiting, illegal diversion and theft of Teva products, suppliers must notify Teva immediately if they are offered the opportunity to purchase counterfeit, illegally diverted or stolen products, or otherwise become aware of any such products.

Labor

Suppliers shall uphold ethical labor practices and procedures globally. Suppliers' responsibility in this matter includes creating awareness and understanding of human rights and compliance with employment and labor laws and practices. By incorporating these principles into strategies, policies and procedures, and embodying these principles, suppliers will uphold their basic responsibilities toward their employees and others.

Suppliers shall support and respect the protection of internationally recognized human rights, and shall ensure that they are not complicit in human rights abuses. Suppliers shall also honor the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced and compulsory labor, and the abolition of child labor.

1. Freely Chosen Employment

Suppliers shall not use forced, bonded or indentured labor, involuntary prison labor or human trafficking.

2. Young Workers

The employment of young workers below the age of 18 shall only occur in non-hazardous work and when such workers are above the local legal age for employment or the age established for completing compulsory education. Accurate and complete employee files shall be maintained, inclusive of confirmation of date of birth.

3. Freedom from Workplace Harassment, Discrimination and Abuse

Suppliers shall provide a workplace free of harassment, discrimination, punitive and/or inhumane treatment.

Harassment is any physical or verbal act that creates an offensive, hostile or intimidating work environment. Discrimination is any workplace action such as hiring, firing, demoting, and promoting based on a prejudice of some kind that results in the unfair treatment of employees. Harassment or discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status shall not be condoned or tolerated.

Punitive and/or inhumane treatment includes, but is not limited to, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse or threat of any such treatment.

Violence of any kind in the workplace, including acts or threats of violence toward another person, intentional damaging of the property of any person, or behavior that causes others to feel unsafe is prohibited and shall not be tolerated.

4. Wages, Benefits and Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits as per custom of the country of employment.

Suppliers shall communicate to the workers the basis on which they are being compensated in a timely and clear manner. Suppliers are also expected to communicate to the worker whether overtime work is required and the wages to be paid for such overtime.

5. Privacy & Protection of Personal Information

During normal business activities, suppliers may collect personal information regarding various individuals, including employees, patients, customers and other persons or entities with whom they do business. Suppliers shall collect and keep only personal information that is legally permitted and legitimately needed to carry out their business and/or the engagement between Teva and the suppliers, and to implementing measures designed to protect such information.

Health and Safety

Suppliers shall conduct their activities with adequate regard for the safety and health of its employees and the general public. Suppliers shall continuously work to provide safe working conditions and instill a strong safety culture worldwide. Suppliers' goal shall be to avoid any accident in the workplace through their rigorous compliance with global safety standards. Each supplier is responsible for a safe and healthy work environment, including for any supplier-provided living quarters.

1. Worker Protection

Suppliers shall protect workers from exposure to chemical, biological, physical hazards and unreasonably physically demanding tasks in the workplace and other company-provided facilities, including living quarters and vehicles. The supplier shall ensure that any employee who comes into contact with hazardous substances will wear proper personal protective equipment and perform the task according to all safety guidelines and instructions.

2. Process Safety

Suppliers shall have programs in place to prevent and respond to catastrophic chemical or biological releases, if applicable. Programs shall be commensurate with the facility risks and, at a minimum, compliant with local laws.

3. Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations affecting the workplace, including supplier-provided living quarters, and shall minimize potentially adverse consequences by implementing and maintaining effective emergency plans and response procedures. For example, supplier's management is responsible for providing safety awareness training, safety drills or other types of safety training as locally required by fire and safety regulations.

4. Hazard Information

Suppliers shall make available safety information relating to hazardous materials in the workplace, including pharmaceutical compounds and pharmaceutical intermediate materials, to educate, train and protect workers and others from hazards.

Environment

Suppliers shall operate in an environmentally responsible manner and shall minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible, and to promote activities that reuse and recycle.

1. Environmental Authorizations

Suppliers shall comply with all applicable environmental laws and regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained by suppliers and remain valid for the term of engagement, with their operational and reporting requirements followed.

2. Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release.

3. Spills and Releases

Suppliers shall have systems in place to prevent and quickly respond to all unauthorized spills and releases into the environment.

4. Restricted Substances

Suppliers shall adhere to all applicable restricted substance laws, regulations and customer requirements including responding to requests for substance composition in materials/parts, prohibition or restriction of specific substances, including labeling for recycling and disposal.

5. Conflict Minerals

Supplier shall ensure that all parts and products supplied to Teva do not contain "Conflict Minerals," i.e., columbite-tantalite, cassiterite, wolframite (or their derivatives tantalum, tin and tungsten) or gold sourced from the Democratic Republic of the Congo (DRC) or an adjoining country that has directly or indirectly financed or benefitted armed groups in the DRC or an adjoining country. Suppliers shall have systems in place that are designed to meet these objectives.

Management Systems

Suppliers shall have a quality management system in place to facilitate continual improvement and ensure constant compliance with all the principles outlined in this Supplier Code of Conduct.

1. Commitment and Accountability

Suppliers shall allocate adequate financial, human and technical resources to ensure compliance with this Supplier Code of Conduct.

2. Legal and Customer Requirements

Supplier shall identify and comply with applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards and relevant customer requirements and address identified gaps in a responsible and timely fashion.

3. Risk Management

Suppliers shall have mechanisms in place to determine and control risks in all areas addressed in this Supplier Code of Conduct. Suppliers shall have adequate financial resources to assure business continuity and maintain financial solvency.

4. Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with the principles contained in this Supplier Code of Conduct and Supplier's compliance with applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards and relevant Teva requirements.

5. Training and Competency

Suppliers shall have an effective training program that achieves an appropriate level of knowledge, skills and abilities within management and workers to address these expectations and perform the requested services. Documented training of all employees must be available as evidence that training took place.

7. Communication

Suppliers shall maintain open and direct communication with appropriate Teva business functions, including Global Procurement.

8. Data Integrity

Suppliers shall have a mechanism in place to ensure that all supplied documentation, particularly for material or services used in primary product activities, is complete, accurate and consistent. Such documentation should be compliant with applicable regulations requirements.