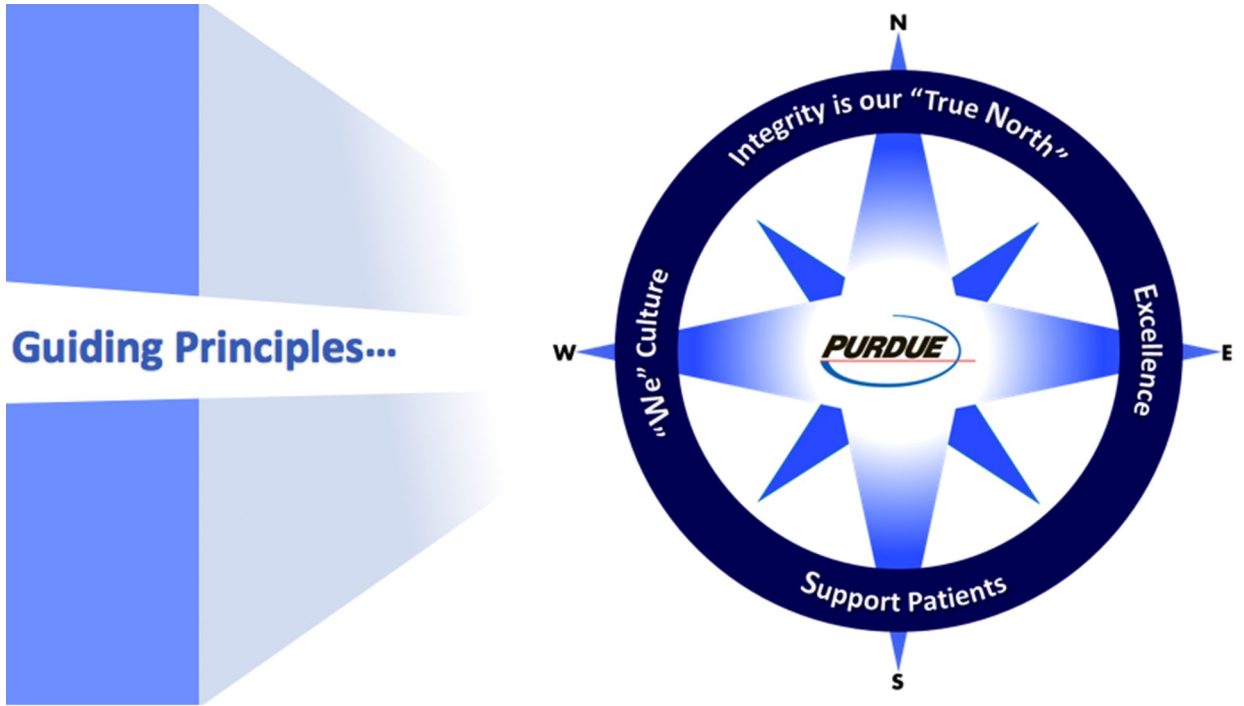




GUIDANCE FOR SUPPLIERS OF PURDUE PHARMA L.P.

PURDUE'S GUIDING PRINCIPLES



Integrity is our "True North"

We are committed to upholding the highest ethical standards throughout our business. As an important stakeholder in pain management, we embrace responsible stewardship and are dedicated to combating opioid abuse, diversion, addiction, and overprescribing. Every decision matters.

Support Patients

We are relentlessly passionate about our mission to identify, develop, and supply innovative medicines that meet the evolving needs of patients as well as their families, healthcare providers, and society. The health and safety of patients is our #1 priority.

Excellence

We have pioneered meaningful technologies and medicines that support patients. With this heritage, we are working toward a future of novel approaches to pain management and other therapeutic areas. We are dedicated to innovation and uphold the highest scientific, commercial, and regulatory standards. We will always strive to do better.

"We" Culture

We actively seek, value, and draw on colleagues who are diverse in opinions, backgrounds and experiences to challenge the status quo and succeed as a team. We operate as a family, where everyone's ideas and concerns are explored. The voice of every colleague is essential to our progress.

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November 2017

Suppliers,

Purdue maintains high standards of integrity and aims to apply the highest ethical standards in all business activities. Purdue's Suppliers are an essential part of the overall success of Purdue. Purdue and its Suppliers make decisions that impact Purdue's ability to provide quality healthcare products to its customers.

To reinforce the standards to which Purdue holds both itself and its Suppliers, Purdue has created this Guidance for Suppliers of Purdue Pharma L.P. ("Guidance"), reflecting its dedication to maintaining Purdue's Guiding Principles, following **Integrity as our True North**. Our expectation is that our suppliers will, at a minimum, operate in full compliance with all applicable laws, rules and regulations.

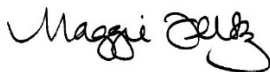
Purdue's expectation is that each of its Suppliers operate in an ethical manner and in compliance with this Guidance. Because our Suppliers are an extension of our business, we have the same expectations for them as our own employees. We appreciate that you/your organization may have your own set of values and policies in place, however, we ask that you please take the time to understand ours and ensure that they are in alignment with your own.

Purdue has established a mechanism for reporting concerns, the Purdue Ethics & Compliance Hotline. In the case of known or suspected concerns, please feel free to contact:

- A member of the Ethics & Compliance Team at compliance@pharma.com or
- The Purdue Ethics & Compliance Hotline: 1-877-PURDUE1

To the extent possible and when appropriate under the circumstances, efforts will be made not to disclose the identity of an individual who reports a known or suspected violation of law, regulation or policy. Similarly protected will be the identity of individuals who participate in any investigation. Retaliation against individuals who report issues in good faith is strictly prohibited.

Thank you for taking the time to review this Guidance and please [be in touch](#) with any questions.



Margaret K. Feltz
Vice President, Ethics & Compliance

ETHICAL BUSINESS PRACTICES

Purdue expects Suppliers to conduct their business in an ethical manner and to act with integrity.

Business Integrity

In all dealings on behalf of Purdue, Suppliers will be honest and accurate, never making misrepresentations about Purdue and always complying with applicable federal, state and international laws.

Preventing Bribery and Corruption

Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Suppliers shall employ fair business practices, including accurate and truthful advertising.

Antitrust

Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable antitrust laws. Suppliers must avoid even the appearance of anti-competitive conduct by complying with domestic and foreign antitrust or “competition” laws. This means that any conversation, understanding or agreement to fix prices, split territories, markets or customers, participate in bid rigging or other anti-competitive behavior is prohibited.

Interactions with Healthcare Professionals (HCPs)

In interactions with HCPs, institutions, advocacy groups, and patients, you must follow both the letter and the spirit of the law, conducting all interactions ethically and in compliance with applicable laws, regulations, guidelines, and industry codes, including the PhRMA Code on Interactions with Health Care Professionals.

Our industry is required to disclose various types of information to government agencies. As our Supplier, if you make payments to third parties on our behalf, this information may be reportable. We require that you comply with our data transmission requirements and timelines.

Product Communication

Suppliers should only provide information about Purdue’s products when authorized to do so. This includes communications about our products in person or through written material, and delivered through any channel, including the internet.

To the extent a Supplier is authorized to discuss Purdue products, that Supplier must follow the highest ethical standards keeping discussions truthful, not misleading and fair and balanced. Likewise, all discussions must be consistent with the product label or messaging and materials approved through Purdue’s Material Review Process.

Clinical Trials

When engaged in clinical trials on Purdue’s behalf, Suppliers are expected to do so in

accordance with all applicable guidelines, national and local laws and regulations, as well as stringent medical, scientific and ethical principles.

Adverse Event and Product Complaint Reporting

When engaged on behalf of Purdue, Suppliers who learn of an adverse event or product complaint pertaining to a Purdue product (or a product with an unknown manufacturer with the same active ingredient as a Purdue product) are required to follow all procedures regarding the reporting, investigation, and tracking of adverse drug events and product quality complaints.

- For Adverse Events, please do one of the following:
 - Send an email to AEReport2@pharma.com
 - Call Purdue's Drug Safety Line at 888-726-7535, Prompt 2 or
 - Fax relevant information to 203-588-6395
- For Product Complaints, please do one of the following:
 - Send an email to ProductComplaints@pharma.com
 - Call Purdue's Drug Safety Line at 888-726-7535, Prompt 3 or
 - Fax relevant information to 203-588-6395

Animal Welfare

Animals should be treated humanely minimizing pain and suffering. Animal testing should be performed using the least number of animals and in a way that minimizes distress. Alternatives should be used whenever these are scientifically valid and acceptable to regulators.

Conflict of Interest

Suppliers must avoid transactions or relationships that are or appear to be in conflict with Purdue business. Purdue and its suppliers are expected to use good judgement and to avoid situations that can lead even to the appearance of a conflict.

Suppliers that do business with Purdue shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of Purdue. All Suppliers shall notify Purdue immediately in the event of a potential or actual conflict of interest by sending an email to compliance@pharma.com.

Supplier Diversity

Suppliers shall engage different groups of suppliers through thorough sourcing activities that support equal opportunities.

INFORMATION ACCURACY AND PROTECTION

Suppliers have a duty to protect Purdue's confidential and proprietary information and must maintain accurate records to support activity undertaken on behalf of Purdue.

Confidential Information Management

Suppliers shall safeguard and make only proper use of confidential information, including personal information, to ensure that rights and interests of Purdue, and those who have entrusted their information to Purdue, are protected.

Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable laws, regulations, standards and Purdue requirements.

Training and Competency

Suppliers shall train their workers to achieve an appropriate level of knowledge, skill and ability to manage and address the expectations set forth herein.

Business Continuity

Suppliers are responsible for developing and implementing appropriate business continuity plans for all operations supporting Purdue's business.

COMPLIANCE WITH LABOR LAWS

Suppliers shall be committed to uphold the human rights of their employees and treat them with dignity and respect.

Freely Chosen Employment

Suppliers shall not use forced, bonded, involuntary, slave or indentured labor.

Child Labor and Young Workers

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing obligatory education.

Non-Discrimination

Suppliers shall provide a workplace free of harassment and discrimination. Suppliers shall not discriminate for reasons such as race, color, age, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity, national origin, physical or mental disability, genetic information, religion, political affiliation, union membership, and veteran or marital status.

Fair Treatment

Suppliers shall provide a workplace free of harsh and inhumane treatment, including any sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

Wages, Benefits and Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall, in a timely manner, communicate with workers the basis on which they are being compensated. Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as required by local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation or harassment.

SAFE WORK ENVIRONMENT

Suppliers shall provide a safe and healthy working environment.

Worker Protection and Safety

Suppliers shall operate in compliance with all applicable health and safety regulations and ensure safety management systems are in place to prevent work-related personal injuries.

Suppliers shall take reasonable measures to protect workers from overexposure to chemical, biological, physical hazards and physically demanding tasks.

Process Safety

Suppliers shall have programs in place to prevent or mitigate incidents associated with operations and processes that could result in catastrophic impact to people or the environment.

Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

Hazard Information

Vendors shall make available safety information relating to hazardous materials in the workplace to educate, train, and protect workers from hazards.

Environmental Authorizations

Suppliers shall comply with all applicable environmental laws, regulations, codes, and other governmental requirements and authorizations. Suppliers shall obtain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations and restrictions.

Waste and Emissions

Suppliers are expected to 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 should be appropriately managed, controlled and treated prior to release into the environment.

MAINTAINING QUALITY AND THE SUPPLY CHAIN

Suppliers shall provide products and services of the highest quality to protect the health and safety of patients and consumers.

Product Quality

Suppliers involved in the supply, manufacturing, packaging, testing, storage and distribution of materials and/or products on Purdue's behalf will ensure compliance with applicable Quality regulations and current Good Manufacturing Practice and current Good Laboratory Practice requirements for the markets in which the products are registered and distributed.

Supply Transparency

Suppliers shall provide information regarding their supply chain to support Purdue's compliance with manufacturing practices, regulatory requirements, regulatory agency expectations, disclosure responsibilities and policies and our other legitimate business purposes.

Supply Disruptions

Suppliers shall inform Purdue of financial, economic, supply changes or other material conditions that affect or might affect the ability to supply Purdue or Purdue's ongoing operations or operating decisions.

Supply Chain Security

Purdue maintains membership in supply chain security programs that require Purdue and their supply chain partners to meet or exceed acceptable warehouse, transportation and cargo security standards. Supply chain partners may be subject to audit for the purpose of validating Purdue's supply chain security profile.