

GLENMARK PHARMACEUTICALS INC., USA

U.S. CODE OF CONDUCT

Why We Have a Code of Conduct

Glenmark Pharmaceuticals Inc., USA (“GPI” or “Company”) is committed to conducting business with honesty and integrity based on our Vision and Values. This U.S. Code of Conduct (“Code”) articulates core ethical standards applicable to all of our activities. Our Code defines how we do business the right way and forms an important guiding framework for our daily activities, both internal and external to the Company. You are required to carefully read our Code and are encouraged to refer to it often for guidance.

As a U.S. pharmaceutical company, we are subject to numerous laws, rules, and regulations. It is everyone’s responsibility to be familiar with the Code, comply with its provisions and report any suspected violations. We are all responsible for protecting our Company and its good name by conducting ourselves in strict compliance with the letter and spirit of this Code, as well as with all applicable laws. Speak up if you have concerns. The obligations outlined in this Code are in addition to existing Company policies, procedures, and handbooks, which are all available on Glenmark Connect.

Letter from our President



Dear Colleagues,

At GPI, our reputation is the cornerstone of our success. Maintaining the trust and confidence of our patients, fellow employees, partners, vendors, and regulators forms the foundation for our continued and future growth. We maintain this trust by acting with integrity and ethics in all we do.

Each and every one of us must take responsibility for protecting GPI’s good name and ensuring we act with transparency, independence, and a sense of responsibility for our business. This Code of Conduct summarizes GPI’s fundamental values in one document. Please take the time to carefully read this Code of Conduct and ensure that your actions adhere to its principles in everything you do.

Thank you for your commitment to ensuring our continued growth and success.

Sincerely,

Sanjeev Krishan, President

ADMINISTERING OUR CODE

Applicability

This Code applies to all GPI Personnel (“Personnel”) and third parties acting on behalf of GPI. Personnel include any employee, officer, director, full-time, part-time, and temporary personnel. This Code also applies to any Glenmark personnel who manage individuals at GPI or otherwise conduct business in the U.S. While this Code is specifically written for our Personnel, we expect third parties who conduct business on our behalf to also understand and respect these standards and implement their own policies and procedures that are fully consistent with this Code.

Our Standards

GPI Personnel and third parties acting on our behalf must comply, both in letter and spirit, with all applicable laws, rules, and regulations where GPI operates as well as GPI’s policies and procedures, including this Code. Personnel are expected to understand the legal and regulatory requirements applicable to their functional area and areas of responsibility.

At some point, you are likely to encounter a situation not covered by this Code, so it is important to use good judgment in everything you do to avoid even the appearance of improper behavior. If you have questions about whether to proceed with a course of action, ask yourself:

- Could my actions reflect poorly on GPI’s reputation?
- Does this feel like the wrong thing to do?
- Will I be violating the law or GPI’s policies or procedures?
- Would explaining my actions (or the actions that I know about) make me uncomfortable?

If the answer is “yes” to any of these questions, do NOT take the action. All other questions about compliance should be addressed to our Chief Compliance Officer. Not being familiar with the Code, law or policies, standards, guidelines, and procedures for your role does not excuse a violation.

Reporting

GPI requires you to promptly report actual or suspected violations of law, rules, regulations, policies, procedures, or this Code, and you will be evaluated, as part of the annual review process, on whether you timely report such actual or suspected violations. Reporting of violations is important to assure that the Company promptly detects, investigates, corrects, and reports violations, and prevents their recurrence.

Report suspected improper activity or a violation of law, rules, regulations, policies, procedures, or this Code the Chief Compliance Officer, General Counsel, or anonymously through GPI’s Ethics and Compliance Hotline ((855) 409-0973 or <http://glenmarkpharma.ethicspoint.com>). The Hotline is independently operated by a third party and is available 24 hours a day, 365 days a year.

As noted, possible violations can be reported anonymously; however, providing your identity will allow you to be contacted to obtain further information, if needed, to investigate the concerns raised. Information will only be disclosed to those who need it to resolve the issue, and you will be afforded the maximum possible confidentiality. You are expected to fully cooperate and to provide as much information as possible surrounding an actual or suspected violation of the law, rules, regulations, policies, procedures, or this Code.

No Tolerance for Retaliation

GPI strictly prohibits retaliation of any kind. Examples of retaliation include, but are not limited to, discharge, demotion, harassment, failure to receive a promotion, or benefits being taken away. It is GPI's policy to provide you with a working environment that is free of retaliation based on your good faith reporting or disclosing of any violation of law, rules, regulations, policies, procedures, or this Code, or based on your cooperation in an investigation of such a report.

Disciplinary action, up to and including termination of employment, will be taken against anyone who retaliates (directly or indirectly) against any Personnel who (1) makes a good faith report of actual or suspected violations, or (2) who cooperates in an investigation of a report of actual or suspected violations. You must report actual or suspected retaliation that has occurred or is occurring. Discouraging other employees from making a report or participating in an investigation is prohibited.

Consequences of Code Violations

GPI will take disciplinary action, up to and possibly including termination, or other corrective action, to resolve confirmed violations of the law, rules, regulations, policies, procedures, or this Code. GPI will protect Personnel who raise a concern in good faith, but it is a violation of this Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with an investigation.

CONDUCT IN THE WORKPLACE

Equal Opportunity; Respecting Others

GPI values the diversity of backgrounds, skills, and abilities that a global workforce brings to our business. We are committed to supporting diversity in our workforce and leadership, and to developing all the talent within our organization. GPI is committed to providing a work environment that is free from all forms of discrimination as well as conduct that can be considered harassing, coercive, or disruptive. GPI will not tolerate any form of discrimination or harassment, including disparaging comments or criticisms.

GPI is firmly committed to providing equal opportunity in all aspects of employment and does not tolerate any unlawful discrimination of any kind. All employment-related decisions must be based on an individual's qualifications and strengths and not on the basis of any personal characteristic protected by the law. Legally protected personal characteristics include race,

color, age, religion, ancestry, national origin, sex or sexual orientation, gender, gender identity or expression, pregnancy, marital status, physical or mental disability or relationship to a person with a disability, medical condition, genetic information, or veteran status.

GPI prohibits all forms of harassment of our Personnel by anyone, including supervisors or other members of management, or third-party business partners. Harassment is offensive conduct that may interfere with a person's ability to perform their work. This includes any type of behavior that could make another individual feel uncomfortable, including bullying, intimidation, conduct of a sexual nature, or simply making inappropriate jokes or statements on the basis of any personal characteristic protected by the law. Harassment does not require intent to offend. Harassment, in any form and at any level, will not be tolerated, and will result in disciplinary action.

Promptly bring any concerns related to harassment or discrimination to the attention of Human Resources or the Chief Compliance Officer.

Safety in the Workplace

You are entitled to work in a safe and healthy environment. We are all responsible for preventing accidents by following health and safety rules and practices, participating in safety training, and reporting accidents, injuries, and unsafe equipment, practices, or conditions. In addition, we must all be familiar with and follow all GPI and facility-specific health, safety, and security policies and requirements applicable to our jobs. If you or someone you know has an accident, is injured, or if you see non-compliance or any other situation posing a threat to the safety or health of anyone while at during work hours, you are responsible for reporting it to your facility Environmental, Health & Safety Manager. GPI will promptly correct any unsafe condition that may exist.

Workplace Violence

GPI has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal or physical assaults, threats or any expressions of hostility, intimidation, aggression, or hazing. GPI prohibits possession of weapons by those other than authorized law enforcement or security officers on all of the Company's properties

Drugs, Substances, and Alcohol Abuse

GPI is committed to maintaining a drug and alcohol-free workplace. You are required to come to work in a mental and physical condition that will allow you to perform your job unimpaired and in a satisfactory and safe manner. You may not use alcohol or use, manufacture, possess, distribute, sell, or transfer any illegal drugs or legal drugs for illegal purposes or be under the influence of any substances while on GPI premises or while conducting any business-related activity away from GPI premises. You may use legally prescribed drugs on the job only if they do not impair your ability to effectively and safely perform the essential functions of your job and without endangering yourself or others. Prior to and during operation of a GPI vehicle or

machinery, you may not ingest alcohol or any drug in a manner or amount that may impair your ability to operate the vehicle or machinery in a safe and lawful manner. You must disclose to GPI all criminal convictions, appeals or fines relating to illegal drugs/illegal use of legal drugs, and/or operating a vehicle while impaired or under the influence.

Please note that there may be instances where drinking alcoholic beverages during Company business hours or while at business-related functions is appropriate, such as in social settings, but make sure you comply with all laws and Company policies. Always exercise both moderation and good judgment.

Privacy of Employee Information

GPI respects and protects the confidentiality of all prospective, current, or former employees' personal information and complies with all applicable laws governing personal information. GPI limits the collection and disclosure of employee information to that which GPI legitimately needs for business and legal purposes. You are prohibited from revealing or disclosing the personal information of another employee if there is not a legitimate need to do so. Prohibited disclosures include, but are not limited to, unauthorized disclosure of salary information of your colleagues, as well as references for current or former colleagues.

CONDUCT IN THE MARKETPLACE

Antitrust and Unfair Competition

Antitrust and competition laws are intended to promote fair competition and protect consumers from unfair business practices. We are responsible for dealing fairly with customers, suppliers, competitors, and other third parties. This means our employees avoid taking unfair advantage through manipulation, concealment or misrepresentation of key facts, or other unfair practices. GPI is committed to compliance with antitrust and competition laws wherever GPI does business. You are strictly forbidden from entering into any formal or informal agreements with competitors, written or verbal, to (1) fix or control prices or terms, (2) allocate markets or customers, (3) rig bid processes, or (4) boycott certain suppliers or customers. We must be careful to not discuss competitively sensitive information when interacting with competitors, such as when participating in trade associations and seminars or acquisition discussions. Never seek out or pass along confidential information of competitors, suppliers, customers, or other business partners.

Antitrust and competition laws are complex in nature and usually vary from country to country. Most countries' antitrust or competition laws have an extraterritorial effect, meaning they apply even when the anti-competitive conduct causing the alleged problem occurred in another country. As a result, it is important that you contact the Legal Department before you explore business arrangements with a competitor or potential competitor or to determine whether or not an activity in which you are participating, or contract you are thinking about entering into, might violate antitrust laws.

Anti-Bribery and Anti-Corruption

GPI strictly prohibits all forms of bribery, kickbacks, corruption, “grease” payments, extortion, or embezzlement. This prohibition on corrupt activity applies regardless of the country in which the payment is made, and regardless of whether the recipient is a Government Official or private citizen. Personnel are never permitted to offer or accept anything of value with the intent to secure an unfair business advantage. Bribery is not limited to monetary payments and can include transfers of anything of value such as gifts, travel, charitable donations, political contributions, entertainment, and other items when made with the intent or desire to wrongfully influence the recipient. There is no threshold amount; any amount can be considered a bribe if it is offered in exchange for favorable treatment. The “thing of value” does not actually have to be given; the promise or offer alone is prohibited.

As a U.S. company, we must comply with the U.S. Foreign Corrupt Practices Act (“FCPA”). Under the FCPA, GPI may be held liable for corrupt or improper offers, promises, or payments by our business partners and third-party representatives. Therefore, we must ensure these entities act compliantly and as appropriate, conduct risk-based due diligence on potential new partners. You must alert the Company of potential new business relationships and provide information as necessary to allow the Company to complete its due diligence.

Gifts

Although there may be times when gifts and business courtesies may be appropriate to build and foster relationships, you must exercise good judgment at all times since gifts have the potential to inappropriately influence behavior or may give the appearance of inappropriate influence. Given the increased corruption risk in interacting with government officials, you may only provide gifts to government officials in limited circumstances, and only with prior approval. Gifts may never be given to Healthcare Professionals.

You may only accept gifts or entertainment from vendors, suppliers, or consultants who are not customers or HCPs in very limited circumstances, and only as long as the gift does not create the appearance of a conflict of interest. Such gifts must be of nominal value and may not influence or appear to influence business decisions.

Global Trade Compliance

As GPI is part of a global company, our success depends on thriving international trade. GPI and any third parties acting on our behalf must follow applicable international trade control requirements in conduct of our business activities. Violations of these laws may result in criminal and civil penalties for the Company and individual employees, officers, and directors. It can also result in seizures of goods and prohibitions on our ability to do business.

We must ensure anything intended for import or export is classified correctly and includes all required documentation. We also must ensure that we are accurate and transparent in our interactions with customs authorities. Under no circumstances can GPI import or export goods or services to countries designated “embargoed” under U.S. law, or to individuals or organizations where contact is prohibited by the U.S. government.

Exclusion and Debarment

GPI does not employ or do business with, and will remove from employment or as a service provider, individuals or companies who are excluded, debarred, or otherwise ruled ineligible to participate in a state or federal healthcare program. As such, you were required to complete a certification of non-debarment at hire and must disclose immediately to Human Resources and the Chief Compliance Officer if you subsequently are excluded, debarred, or suspended, or have become otherwise ineligible to participate in U.S. federal healthcare, procurement, or non-procurement programs. You also must disclose whether you are under investigation for, appealing, or awaiting sentencing on, certain criminal offenses for which you may become excluded, debarred, or suspended.

Quality and Safety and Adverse Event Reporting

Patient safety is vital to GPI. We are committed to ensuring that our products are of high quality and are safe for patients and those who take part in GPI-sponsored clinical trials. We do this by committing to comply with all applicable laws and regulatory requirements including Good Laboratory Practices, Good Clinical Practices, Good Manufacturing Practices, Good Pharmacovigilance Practices, and Good Distribution Practices regarding research, development, procurement, manufacturing, warehousing, packaging, testing, supplying, and maintenance activities.

In addition, GPI is responsible for reporting adverse events for approved products regardless of where, when, or how the information was brought to GPI's attention. Adverse events can be brought to your attention many different ways including, but not limited to, during a social conversation, from an HCP or competitor, while at a meeting, or attending a scientific meeting. Adverse events regarding GPI's marketed product must be immediately reported. Adverse events are not always a negative side effect and may include any type of reaction to a product that is not intended, even if it is a benefit. Report all adverse events and product quality complaints to globalcustomerservice@glenmarkpharma.com or by calling (888) 721-7115.

Promotional Practices and Scientific Exchanges

The health and safety of patients depends on our commitment to discuss our products honestly, truthfully, fairly balanced, and in a scientifically accurate way in all of our scientific and promotional activities. These activities may include clinical trials, enhancing medical knowledge, product promotion, and collecting feedback about our products and research programs. Regardless of the manner through which we communicate, information provided must always be complete, accurate, and not misleading. You must never give the impression that a product can be used for something other than its approved label (called off-label promotion) or promote a product or indication that has not yet been approved by the FDA (called pre-approval promotion). You must not disparage or make false statements about competitor products.

Interactions with Healthcare Professionals; Transparency Reporting

Our interactions with Healthcare Professionals (“HCPs”), as defined in our Interactions with HCPs Policy, must be supported by legitimate business needs. We must never make, or offer to make, any payments or provide anything of value to HCPs with the intent to improperly incentivize or reward the prescription, order, or recommendation of our products. Our interactions with HCPs should center on providing truthful information about our products, along with scientific and educational information. Modest hospitality and educational/scientific sponsorship may be provided in accordance with GPI policies. No gifts may be supplied, offered, or promised under any circumstance. All HCPs that are engaged by GPI to provide services must only be engaged after there is a written contract in place, there is a legitimate business need, and the HCP must be compensated at fair market value (“FMV”). U.S. federal and various state laws require GPI to accurately disclose payments, gifts, meals, travel, and other transfers of value provided to HCPs and teaching institutions. Personnel must therefore keep detailed records of payments or other transfers of value (provision of meals, travel, etc.) to HCPs.

CONDUCT IN OUR BUSINESS

Avoiding Conflicts Of Interest

As an employee of GPI, you have an ethical and legal responsibility to act in the best interest of our Company at all times. A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do inside the workplace. Even the perception of a conflict of interest can cause harm to GPI. Anything that presents a conflict for you may also present a conflict for your immediate family member, and vice versa. This policy does not intend to arbitrarily restrict you from engaging in personal activities. Its purpose is to ensure you understand how your conduct—or even the appearance of your conduct—could cause reputational or legal harm to GPI.

A conflict of interest can happen when:

- You supervise directly or indirectly or conduct business with someone with whom you have a close personal relationship.
- You invest in one of our suppliers, customers, business partners, or competitors.
- You own or do work for a company that competes, does business, or wants to do business with GPI. Serving in an advisory role or on the board of directors for such a company can also pose a conflict.
- Your personal activities and outside interests interfere with your ability to adequately perform your job responsibilities.
- You use GPI’s name or our property or information, without approval, to support a charitable, professional, or community organization.
- You run for an elected office.
- GPI or one of our business partners makes you a loan.
- You take for yourself a business opportunity that is meant for GPI, even if you think GPI wouldn’t want the opportunity.

If you discover that a personal activity, investment, interest, or association could compromise—or even appear to compromise—your objectivity, your ability to make impartial business decisions, or your ability to devote the required time to your Company responsibilities, you are required to disclose it immediately to the Chief Compliance Officer via a signed Conflict of Interest Disclosure Form. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.

Proper Use and Security of GPI Systems and Assets

All Personnel must use GPI systems and assets lawfully, securely, and efficiently, and only for legitimate business purposes. Theft, carelessness, and waste are prohibited, and any suspected incident of fraud or theft should be immediately reported to the Chief Compliance Officer for investigation. Personnel are required to protect our physical assets, such as facilities, equipment, raw materials, and Company funds. Use these assets responsibly and with care and caution since theft, loss, or damage to GPI property can be detrimental. Theft, whether direct (for example, the permanent and intentional removal of GPI equipment) or indirect (for example, seeking reimbursement for expenses not related to GPI business), will result in disciplinary action up to and including termination and may be considered a criminal act. We must also protect our electronic and intangible assets of Company time, intellectual property, and information systems.

Because these are assets and systems that are owned by GPI, GPI has the right to monitor, access, review, disclose, or audit the systems and any content contained on them at any time and without your knowledge or consent in order to protect GPI interests as well as to ensure the integrity of the systems.

GPI assets may only be used for business purposes. Occasional private use is permitted if it does not conflict with the Company's interests, for example, through excessive wear and tear, the creation of security risks, or other disadvantages for GPI. You should have no expectation of privacy when using GPI systems and assets. In the event of any doubt regarding permissible private use, you should obtain an explicit authorization from your supervisor.

Protection of Confidential and Proprietary Information

Confidential information is information that is only known internally and not outside of GPI while proprietary information is information that GPI owns or is the only entity permitted to use it. Confidential and proprietary information can be both tangible (physical) and intangible assets and includes but is not limited to, patents, inventions (whether patentable or not), discoveries, copyrights, trademarks and trade secrets, data, engineering and manufacturing techniques, designs, databases, business records, business plans, salary information, any unpublished financial data and reports, and any confidential or proprietary information received from GPI's business partners or customers. Together, confidential information and proprietary information are called "intellectual property".

Most of what GPI does in its day-to-day business is confidential and proprietary in nature and our intellectual property is a valuable corporate asset that must be protected by all of us. We must also protect the intellectual property of any third parties, such as that of customers,

suppliers, joint venture partners, and other affiliates. Failure to safeguard this intellectual property may be damaging to GPI, could give competitors an unfair advantage, or cause damage to third parties. Unauthorized disclosure of GPI's or a third party's intellectual property will not be tolerated. Intellectual property must not be shared with anyone who does not have a need to know it in order to perform their business responsibilities.

If you become aware that intellectual property has been inadvertently disclosed, immediately report the issue to the Legal Department. It is extremely important that no GPI business be sent to or conducted over your personal e-mail accounts; this includes sending any business-related items as well as any GPI confidential or sensitive information. Your obligations to protect our intellectual property lasts even after you leave GPI.

Protection of Personal Information/Privacy

During normal business activities, GPI may collect personal information about various individuals, including our employees, patients, customers, and other persons or entities with whom we do business. Collection and use of personal information is important to our business, but its unlawful use or disclosure could hurt the person to whom the information pertains, our Company, and other stakeholders. Therefore, we collect, keep, and disclose personal information only to the extent we need it for legitimate business, human resource, or scientific purpose, or as otherwise required or permitted by applicable law. Personnel responsible for handling personal information must maintain it in a confidential and secure manner.

Responding to Government Inquiries

As a company operating in a highly regulated industry, GPI is subject to routine auditing by various government agencies. In addition, at any time, GPI could be the subject of a regulatory or other investigation. It is Company policy to cooperate fully with government agencies conducting investigations. Immediately notify the Legal Department if you are contacted by any government authority with regard to a non-routine request for information or a facility visit.

Media Inquiries and External Communications

GPI is committed to providing timely and credible information to the public including, but not limited to, the media, financial analysts, and investors. All public disclosures, such as, forecasts, press releases, speeches and other communications must be accurate, truthful, and reliable; utilize materials that have been approved by the requisite GPI employees; utilize appropriate GPI formats in accordance with our policies and procedures; and be made only by Personnel authorized to publicly communicate on behalf of GPI. Do not share information about GPI or our products, either verbally or in writing, with the public unless you have express permission from GPI to do so. Any requests you receive for comment or information must be forwarded immediately to GPI Communications Director.

Social Media and Public Communication

When using social media and communicating with the public, use good judgment and common sense. You must never disclose confidential or proprietary information of the Company or that of employees, subsidiaries, affiliates, customers, suppliers, or other business partners in your personal social media, other online postings, or public communications. You must avoid the appearance of speaking for the Company. Even in private communications, you should appreciate that you can be perceived as a GPI representative. Therefore, we ask that you think about your words and conduct, understanding your actions may reflect on GPI, whether you intend them to or not. GPI will take disciplinary action, up to and possibly including termination, or other corrective action, for public statements made that violate this policy. Nothing in this policy, however, should be interpreted to prevent you from engaging in activities that are protected under the law.

Securities Laws and Insider Trading

During the course of our day-to-day work, we learn information that is not known to the general public. Using this information for personal financial gain such as buying or selling securities (such as stocks, bonds, or options) of the company whose information you are using is called “insider trading” and is illegal. The law prohibits those with material, non-public information relating to a company from using it for personal gain. “Material” information includes anything likely to influence a potential investor’s decision to buy or sell securities, such as information about a company’s financial performance, proposed strategic alliances, any government action (such as regulatory drug approvals, non-approvals, or warning letters), clinical trial data, and planned changes in senior management. The prohibition on insider trading is not limited to you. We are also prohibited from providing such insider information, either directly or indirectly, to anyone else so that they can profit from such trades. It is not only a violation of Company policy to engage in insider trading, it is also a crime.

Records Management

Proper management, storage, and retention of GPI records is critical to our business operations and ensures that records are available when they are needed. Keep in mind that records do not necessarily have to be written, but can be in any format, including electronic, as long as the document was created while conducting GPI’s business. Examples of media containing business records include paper documents (including handwritten notes), audio or video recordings, voicemails, texts, instant messages, and computer-based information such as email and computer files. Records relevant to a pending or threatened government or Company investigation or other legal action must not be destroyed. In the event of litigation or government investigation, you should consult GPI’s Legal Department for instructions on document retention as well as abide by any legal hold notices.

Integrity of Books and Records

GPI’s books, records, and accounts must accurately and fairly reflect the Company’s transactions and the disposition of its assets. Compliance with accepted accounting rules and controls is

expected at all times. Even if you are not directly responsible for the preparation of financial reports, you are responsible for ensuring that relevant events and facts in your area of responsibility are timely communicated when requested by the appropriate Company personnel. You must never create or help to create any records that are intended to mislead anyone or conceal any improper act or conduct. You are strictly prohibited from circumventing GPI's internal controls. This policy covers all of GPI's clinical activities, books, records, financial statements and accounts, time records, invoices, expense reports, environmental and safety reports, contracts, payroll and benefits records, performance evaluations, and all other essential GPI information.

If you have reason to suspect that the Company's books and records are not accurate or in accordance with the above-stated requirements, you must immediately report the matter to the Chief Compliance Officer or via the Hotline.

CONDUCT IN OUR COMMUNITY

Political Participation and Contributions

GPI Personnel are encouraged to individually participate in the political process. However, political participation must happen on your own time and at your own expense. GPI will not reimburse Personnel for political contributions and it is never appropriate to use Company resources in your personal support of any political party, candidate, or activity. Personnel who advocate a political position or endorse or oppose a candidate for political office must avoid any implication that they are representing the Company in their advocacy. You may not lobby, give gifts, or otherwise try to influence the actions of government officials regarding legislation or other policy decisions on matters relating to Company business unless the action is approved by the Legal or Government Relations Departments.

Ethical Labor Practices

GPI acknowledges, respects, and commits to operating its business in a manner consistent with ensuring the dignity and human rights of every individual. We are committed to protecting human rights, promoting safe workplaces, and promoting fair labor practices across our business. Personnel have a responsibility to report any known or suspected violations of human rights and address any negative human rights impacts related to the Company or its suppliers. We expect our suppliers to share our commitment to human rights.

Animal Welfare

GPI is committed to protect the welfare of animals by conducting our animal research responsibly, humanely, and ethically and consistent with U.S. law and ethical standards. We strive to conduct our early stage research without the use of animal testing and comply with U.S. laws when animal testing is required. For those clinical programs that require animal testing, GPI evaluates those animal studies to minimize the use of research animals and looks for alternatives when possible.

CONTACTS

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Ethics and Compliance Hotline

<http://glenmarkpharma.ethicspoint.com/>

Dial toll-free, within the United States, Guam, Puerto Rico and Canada: (855) 409-0973