

# Code of Conduct

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Our Code of Conduct is an illustration of the guiding ethical principles that support Allergan's commitment to compliance.

This document serves as a tool for each of us as we work to make good decisions and act with integrity.

But the Code of Conduct is only that – a document.

It is our behavior that brings this Code of Conduct's principles to life.

Every day we are faced with decisions and actions that allow us to make a difference at Allergan, and in each of these situations we have an opportunity to embody the principles of our Code of Conduct.

By doing the right thing, we help foster a culture of compliance at Allergan – a culture of which we can all be proud.

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Our success at Allergan is built on our reputation as a provider of quality products and as a company with a strong commitment to do the right thing. Allergan has a long history of holding itself to the highest of ethical standards, and our business is built on the belief that the principle of doing the right thing should be instilled in everything we do.

As a healthcare company, our actions impact the lives of patients. These patients depend on us, as do our colleagues, our stockholders, the marketplaces we serve and the community. Behaving ethically and with integrity is what is best for patients, and it is what is best for our business.

For this reason, we can never forget that there is no right way to do a wrong thing. We all recognize that, as individuals and as a company, we are of the highest integrity. Our actions are guided by a shared belief and a shared responsibility to do the right thing, but operating a business globally is complicated and can present us with challenges. The right thing to do isn't always clear or obvious, and that is why Allergan has put in place resources to help each and every one of us navigate the complexities of our global operations.

This Code of Conduct outlines Allergan's commitments to integrity and ethical conduct. It is a resource for all of us to identify the principles and values that Allergan is founded upon and to understand what is expected of each of us as representatives of the company. We must all read and understand this Code of Conduct, as well as our policies and procedures, and strive to uphold the principles of ethics and integrity set forth in these written standards.

We both personally encourage you to challenge yourself every day to do the right thing and ask questions when you aren't quite certain what the right thing may be. Aspire to better Allergan, our business processes and controls and the impact you make on the company and those around you. Live the principles and values of this Code of Conduct, and never compromise your integrity.

At the end of the day, our company cannot achieve business goals by sacrificing our principles and values. Business success and ethical conduct go hand-in-hand.

We all have a shared obligation to do the right thing. Collectively, we can achieve strong business results and make positive contributions by working together and upholding our commitment to ethical conduct.

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### customer focus.

Every action we take is with an eye on the “Three Ps”: the patients who benefit from our products, the physicians who trust our products and the payors who recognize the value of our products.

### impact.

We make an impact – going the extra distance to get the very best results, applying the highest standards to all that we do. We value and reward smart, fast action that gets meaningful results.

### passion & people.

We succeed primarily through our people, whose talent brings quality to our work and whose passion brings commitment – not just from processes and structures alone.

### collaboration.

We are committed to sharing our knowledge and collaborating as a team to reach common goals. We promote and encourage different personal and cultural perspectives that drive new thinking.

### innovation.

We are uncomfortable with the status quo. We adapt, we improve, we have the courage to thoughtfully take risks as a team and seize new opportunities – for the company and ourselves.

### integrity.

We get results the right way, without cutting corners. We are transparent, clear and respectful in our dealings with customers, co-workers and partners.

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## OUR COMPLIANCE PROGRAM

At Allergan, we are committed to ethical conduct that upholds the laws and regulations that apply to our company. This commitment starts at the top, with our Board of Directors, Chief Executive Officer and senior leadership, and is supported by a dedicated Corporate Compliance organization.

Under the guidance of our Chief Compliance Officer, the Corporate Compliance Department works to ensure that Allergan maintains compliance with applicable laws and regulations and consistently applies ethical standards throughout the company. The Corporate Compliance Department partners with our business to understand their needs, create an optimal and compliant approach to our operations and monitor our day-to-day activities to ensure that we are conducting our business ethically and in compliance with our policies and procedures.

We continuously strive to make Allergan an even better and more responsible company for our employees, our stockholders and patients around the world. The Chief Compliance Officer and the Corporate Compliance Department are tasked with driving our compliance efforts; but as with all ethics and compliance related activities in our company, every employee ultimately shares this responsibility.

### CONTACTING ALLERGAN COMPLIANCE

The Corporate Compliance Department can be reached via phone at (714) 246-5998 or via email at [IR-Corporate\\_Compliance@Allergan.com](mailto:IR-Corporate_Compliance@Allergan.com).



## OUR CODE OF CONDUCT

This Code of Conduct represents our commitment to compliance and ethical conduct and serves as a guide for our behavior at Allergan. It is a written standard that serves as a resource and a tool to answer questions that may arise in the course of doing our job, and it outlines our responsibility to the company to act with integrity.

While we all want to do the right thing, the “right thing” isn’t always easy to identify. Our Code of Conduct can provide guidance or point us in the direction of someone who can help with our questions or concerns. Of course, this Code does not outline every issue or situation we may encounter while performing our job, nor does it address every law or regulation that applies to Allergan globally. It is a foundation for making good decisions and remembering that there is no right way to do a wrong thing.

This Code of Conduct applies globally to all employees, officers and members of the Board of Directors of Allergan – regardless of location or job title. As part of our commitment to ethical conduct, compliance with this Code of Conduct is a condition of employment at Allergan; and all employees of the company are required to certify to compliance with this Code of Conduct annually.<sup>1</sup>



**Q:** I have a compliance question, and the Code of Conduct doesn’t address my issue specifically. Where can I go to get help?

**A:** Every employee is encouraged to raise questions or concerns that they may have. You can reach out to any of the following resources for guidance:

- Your supervisor;
- Your Human Resources representative;
- The Chief Compliance Officer;
- The Corporate Compliance Department or
- The EthicsHelp Line.

**Q:** Does this Code of Conduct address all of the global requirements I may face in my role with the company?

**A:** No. Our Code of Conduct addresses the high level requirements Allergan faces around the world. It is not an exhaustive list of the laws and regulations that apply to our company, nor does it detail regional or country specific laws that may apply to your role. Our Code of Conduct outlines Allergan’s high ethical standards and the expectation that you act with integrity in all that you do.

The Code of Conduct is a guiding document that should serve as a foundation as you navigate the business decisions you face every day. You should also consult local Allergan policies and procedures and raise questions to appropriate resources when you are unsure of what to do to comply with local laws and other requirements.

<sup>1</sup>To the extent permitted by local law. Compliance with this Code of Conduct does not modify “at-will” employment status.

## OUR SHARED ROLE IN PROMOTING COMPLIANCE

The responsibility for ensuring that Allergan does the right thing rests with each one of us. We all share ownership of the company's reputation as a leading multi-specialty healthcare company, and we must be mindful that our actions – or inactions – have the potential to negatively impact Allergan's reputation.

As a company and as individual employees, we need to do what is right and act with integrity at all times. Every one of us owns compliance at Allergan, and we must ensure it is integrated in all that we do. When we find ourselves unsure of what the best and most ethical course of action is, we need to ask questions and raise the issue to an appropriate resource. Ignoring possible compliance risks or looking the other way is never an acceptable choice, as it could hurt our company, our shareholders and – most importantly – patient health. Allergan expects each one of us to lead by example and always do the right thing.



This is especially true for those employees with leadership or managerial roles, as other employees often look to the examples set by supervisors and senior level employees to guide their own behavior. We all need to work to maintain an environment of open communication so that any and every employee feels comfortable asking questions and raising possible ethical concerns without the fear of retaliation. Employees with leadership or managerial roles need to set this tone and provide a voice for their employees.

### IRRESPONSIBLE THINKING LEADS TO IRRESPONSIBLE BUSINESS

If something doesn't seem right, it probably isn't. You should stop and re-think your actions or the actions of others if you think or hear any of the following sentiments:

It's what everyone else is doing...

Who would it hurt, anyway...

I'm not sure about this, but I don't want to lose business...

That's how we've always done it...

I don't have to follow all of these policies and procedures...

That's just how they do business here...

If I don't do this we will miss our deadline...

No one is going to find out...

It's not my problem...

## OUR RESOURCES FOR RAISING CONCERNS

When we are faced with situations that leave us concerned or confused about which course of action is the most ethical option, or if we come to believe that someone has violated or will violate this Code of Conduct, a company policy or procedure or an applicable law or regulation, Allergan provides us with resources to address our concerns. We are encouraged to raise questions and concerns to any of the following resources:

- Our supervisor;
- Our Human Resources representative;
- The Chief Compliance Officer;
- The Corporate Compliance Department or
- The EthicsHelp Line.



Allergan encourages us to first speak with our supervisor about any ethical questions or compliance concerns we may have, but the company recognizes that there may be occasions when an employee does not feel comfortable speaking with their supervisor directly. All employees should feel at ease raising their concerns, and we may use any and all of the company's reporting channels as we feel appropriate.

It is important to remember that Allergan cannot address a potential ethical or compliance issue if the company is not aware of it. Raising questions and concerns through one of Allergan's reporting channels is crucial to maintaining compliance and ensuring that our company does the right thing. We have a responsibility to the company to come forward and speak up. If we are aware of something that does not seem right, we need to raise the issue – even if we are not certain and do not have proof that something unethical or illegal has occurred.

### THE ETHICSHelp LINE

The EthicsHelp Line is a hotline reporting service provided by Allergan for employees to raise questions or report concerns. It is managed by a third party and is not staffed by Allergan employees. The EthicsHelp Line is available 24 hours a day, 7 days a week and may be called from any company location globally.

If you raise a question or report a concern to the EthicsHelp Line, any information you provide will be kept private and will be shared only with Allergan individuals necessary to answer your question or investigate a reported issue. If you do not feel comfortable providing your name when calling the EthicsHelp Line, you may report a concern anonymously, as permitted by local law.

The EthicsHelp Line can be accessed by phone in the U.S. by dialing (888) 645-0090 and outside of the U.S. by first dialing the relevant AT&T country-specific access code and then (888) 645-0090 when prompted. A list of AT&T country-specific access codes can be found on the company's Corporate Compliance portal site.

In certain countries, local law may dictate the availability and terms of use of the EthicsHelp Line.

## PROTECTION FROM RETALIATION

Allergan has a strict non-retaliation policy – the company will not tolerate retaliatory conduct of any kind. In order to support our commitment to compliance and ethical conduct, Allergan relies on each one of us to speak up and raise our concerns; and the company works to create an open environment whereby we all can feel comfortable doing so.

Any employee who in good faith raises a question or concern through an Allergan reporting channel is doing the right thing, regardless of whether or not the concern proves to be unfounded, and deserves to work in an environment free from retaliation. If an employee feels that they are being retaliated against, they should report the issue immediately.

We all owe a responsibility to the company and to our colleagues to support and contribute to an open environment and refrain from engaging in retaliatory conduct. If retaliatory conduct is reported to the company, the issue will be investigated. Any employee found to have engaged in retaliatory conduct will face disciplinary action up to and including termination.

**Q:** If I report an issue about my supervisor, she will know that I am the person who reported her because I am the only one with knowledge of the issue. How do I avoid being retaliated against if I report the issue?

**A:** Allergan will not tolerate retaliatory conduct of any kind. It is important that you report your concern so the company can investigate the issue. If, at any point after you report your concern, you feel as though your supervisor or anyone else in the company is retaliating against you, you should report the retaliatory conduct as soon as possible through one of the company's reporting channels. The company will investigate the report of retaliatory conduct, and any employee found to have engaged in retaliatory conduct will face disciplinary action up to and including termination.

**SCENARIO:** You suspect that a colleague might be making some unethical payments based on figures that you have seen. You don't want to get your colleague in trouble if he isn't doing something wrong, and you don't know if you should say anything since you don't have any proof.

**BEST COURSE OF ACTION:** If you believe that something unethical has taken place or will take place, you should raise the issue through one of Allergan's reporting channels as soon as possible. The company will investigate the issue and share information only with those who need to know for purposes of the investigation.

When faced with such situations, remember that it is important that Allergan looks into any possible matter of non-compliance, even if it proves to be unfounded, to ensure that the company maintains compliance and operates ethically.



## RESEARCHING AND DEVELOPING OUR PRODUCTS

At Allergan, we take great pride in discovering products that offer the opportunity to make a meaningful difference in the lives of patients. We respect the responsibility involved in bringing our products to market, and we value product quality and safety as two of our highest priorities.

Our commitment to quality and safety is one we must all share, regardless of our individual role in the company. It applies to all phases of the life cycle of our products – from the initial clinical trial of a product and continuing all the way through to consumer use. In our global operations, we work to meet or exceed the most stringent product regulations applicable to our company to ensure that patient safety is never compromised.

To that end, we all share a responsibility to maintain Allergan's high quality standards by:

- Making patient safety a paramount focus of our research and development efforts;
- Following all applicable laws, regulations and company policies and procedures;
- Handling all research and development activities ethically and at the highest levels of contemporary scientific standards;
- Never sacrificing quality to meet a deadline or target and
- Raising any quality questions or concerns through appropriate channels.

**SCENARIO:** You recognize that data from an Allergan-sponsored clinical trial may indicate a possible safety issue with the product being studied, but the product implications are very promising overall. Some people involved have suggested that your team hold off on reporting the potential safety issue because the product could help patients that much sooner if its release is not delayed by further study of the potential safety concern.

**BEST COURSE OF ACTION:** You should never compromise patient health by ignoring a potential safety issue during a clinical trial. Allergan is committed to conducting clinical trials ethically and in accordance with guidelines, and you need to be vigilant about maintaining these standards. The safety issue must be reported as appropriate; and if you feel that the team involved will not report it, you need to raise the issue through an Allergan reporting channel as soon as possible. At Allergan, we never jeopardize patient health to get a new product to market or to get a new indication for an existing product.

### ALLERGAN CLINICAL TRIALS

Information about our clinical trials can be found on the websites <http://www.allerganclinicaltrials.com/> and <http://www.clinicaltrials.gov/>.



## PROVIDING ACCURATE PRODUCT INFORMATION

Allergan is committed to carefully assessing the risks and benefits of our products before and after we bring them to market. We understand that it is critical for patients and physicians to understand these risks and benefits before making treatment decisions, and the responsibility of providing accurate product information is one we take very seriously.

We support new medical research and recognize that clinical trial and other research findings are an important means of adding to the medical community's body of knowledge. We strive to make all clinically significant scientific information resulting from our clinical trials and other research publicly available and to ensure that any publications resulting from research financially supported by Allergan accurately disclose the company's support.

We collaborate with appropriate regulatory authorities to determine the label information for each of our products in an effort to ensure that accurate and complete information about the indications and safety of our products is provided. We engage in ongoing monitoring of each product's safety profile while on the market. If, at any time, a product's label needs to be updated, we work with the appropriate regulatory authorities to ensure that physicians and patients are able to make decisions based on the most up-to-date and recently approved information.



**SCENARIO:** You know that one of our products can treat a new therapeutic area, but it is not approved to do so. A physician has informed you that, if the company sponsors her clinical trial, she will prescribe the product for this new use and spread the word as a panelist at a major medical conference next month.

**BEST COURSE OF ACTION:** It is against Allergan policy to use a research or publication activity as a means of commercially promoting a product for an off-label use or to induce a physician to do so on our behalf. The physician's request is inappropriate. You should report the issue through one of the company's reporting channels as soon as possible and refrain from calling on this physician in a promotional capacity until you receive further guidance.



**Q:** A physician conducting an investigator-initiated trial financed by Allergan has informed me that he does not intend to report the results of his study as required because they suggest that the product in question may not be beneficial for the indicated therapeutic area. Do I need to do anything?

**A:** Allergan requires all physicians conducting investigator-initiated trials with financial support from the company to report the results of their study, regardless of the trial's outcome, just as Allergan reports the results of its clinical trials. You should notify the company group responsible for managing the investigator-initiated trial relationship with the physician or report the issue through one of the company's reporting channels as soon as possible. It is important that clinically significant scientific information be made available to the medical community, regardless of whether or not the information aligns with company strategy or the goals of an individual physician.

## PRODUCING QUALITY PRODUCTS

Allergan has built its reputation on developing and manufacturing quality products. Our commitment to quality is the right thing to do for patients and for our company; and by focusing on quality and continuous improvement in our manufacturing operations, we continue to earn the trust of physicians and patients worldwide.

By engaging qualified and reputable suppliers and following the most stringent guidelines applicable to our global manufacturing operations, we ensure that our products meet the high standards that physicians and patients have come to expect from us.

We further strive to meet these high standards by rigorously challenging the integrity of the products we manufacture so that only products of the highest quality reach the market. We continue to evaluate the performance of our products throughout their shelf-life, which can be several years, to maintain their quality and reliability.

We all share a responsibility to maintain our high quality standards for manufacturing by:

- Making patient safety a paramount focus of our manufacturing efforts;
- Following all applicable laws, regulations and company policies and procedures;
- Engaging only suppliers and other third parties who support Allergan's commitment to high quality standards;
- Never sacrificing quality to meet a deadline or target and
- Raising any quality questions or concerns through appropriate channels.

**SCENARIO:** A friend has informed you that he has started purchasing one of our pharmaceutical products from a relative in another country for a significant cost savings. To your friend's knowledge, his relative is not associated with Allergan in any way and purchases the product online from a company whose name you do not recognize. This seems wrong to you, but you are not sure if it is and don't have much information.

**BEST COURSE OF ACTION:** While you may not know all of the details, you should report the issue through one of Allergan's reporting channels as soon as possible. Anyone alleging to sell Allergan products that is not associated with our company may be selling counterfeit products.

Additionally, the importing and re-importing of prescription drugs across country lines by anyone other than the manufacturer may violate local law. The company must look into this matter immediately and involve the authorities as necessary.

**Q:** I think there may be an issue with one of the manufacturing processes at my facility. We are behind schedule; and if I say anything, we will have to hold all products that went through the process while the Quality team investigates. That will put us even more behind schedule. What should I do?

**A:** Allergan never sacrifices quality to meet a deadline or target. You should report the matter through appropriate channels immediately. The quality of our products cannot be compromised. The Quality team needs to investigate and, if appropriate, remedy the issue.



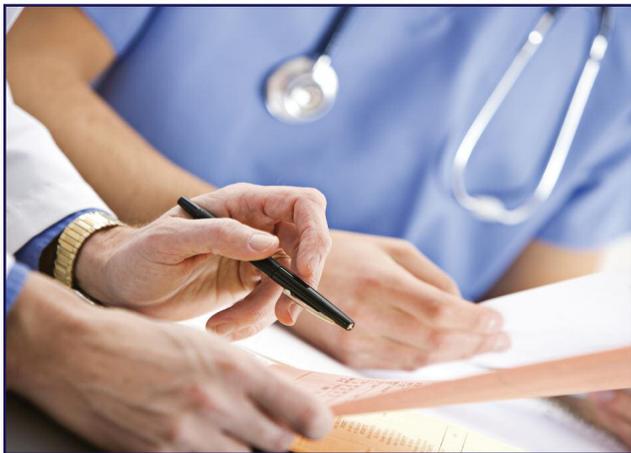
## PROMOTING OUR PRODUCTS

Allergan is committed to advertising and promoting our products honestly, accurately and in accordance with applicable laws and regulations. Promotional material and activities, which can include any material or activity proactively used by the company or its employees that contains claims or other information about our products, are highly regulated around the world. As our promotional material and activities represent both our products and our company, we must ensure that they contribute to our reputation as a trusted provider of quality products.



**Q:** I know from personal use that one of our products can be effective in treating a medical condition for which the product is not approved. Am I allowed to share this information with the physicians I call on in a promotional setting, since I am just sharing something from my personal experience?

**A:** No. Allergan employees may not promote uses of a product that are inconsistent with the approved product labeling. As an Allergan representative, you may not promote products for any off-label indication, which includes discussing your personal experience with the product as an off-label medical treatment.



**SCENARIO:** You are a sales representative, and one of the physicians you call on has questions about an off-label indication of one of our products.

**BEST COURSE OF ACTION:** As a sales representative, you are not permitted to discuss off-label product indications with physicians. You should inform the physician that the question is off-label and recommend that the physician contact the appropriate Allergan team who can provide non-promotional, scientific information related to the request. Based on the physician's need, you can provide the physician with the phone number to reach a member of Medical Information Services directly, refer the physician to the appropriate Regional Scientific Services Specialist (RSS) or follow any other regional or country approved process for handling requests for off-label information.

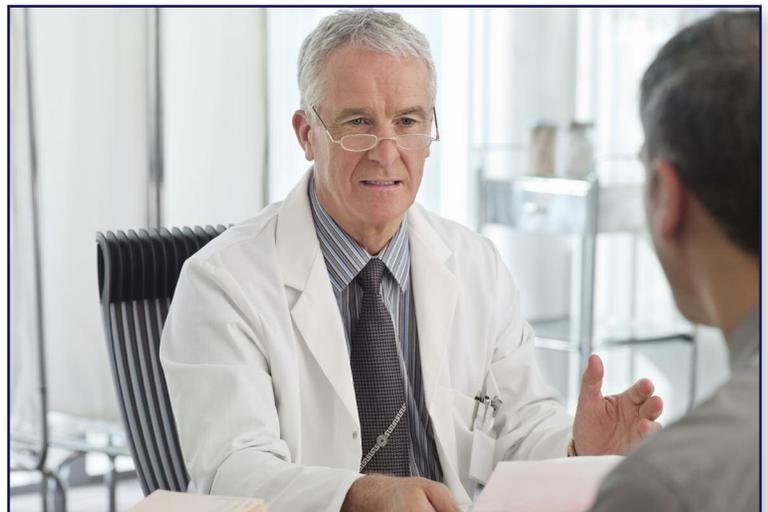
Any employee involved in the creation, presentation or coordination of promotional material or activities for an Allergan product must adhere to the following standards:

- Make patient safety a paramount focus of our promotional efforts;
- Follow all applicable laws, regulations and company policies and procedures;
- Address only Allergan approved information or material;
- Present all information honestly and accurately;
- Describe the risks and benefits of the product in a balanced manner;
- Ensure information presented can be supported by scientific data and
- Address only on-label indications for the product.

At Allergan, we promote products only in a manner consistent with approved product labeling – meaning that our promotional efforts remain on-label. Each of us that comes into contact with promotional material, participates in promotional activities or interacts with physicians or other healthcare professionals needs to be mindful to promote only on-label information about our products.

**SCENARIO:** You are conducting a speaker program. The speaker for the program just discussed off-label product indications for one of our products at length.

**BEST COURSE OF ACTION:** Allergan conducts promotional activities that educate healthcare professionals only on the on-label indications of our products. You should immediately contact the Corporate Compliance Department and report the matter. Speakers at Allergan speaker programs must keep the presentation on-label. Should attendees raise off-label questions, the speaker must quickly bring the conversation back to on-label indications. Allergan only promotes our products for on-label uses, and it is important that this matter be reported to prevent such incidents from occurring in the future.



## PROVIDING AND ACCEPTING BUSINESS COURTESIES

In the course of conducting business at Allergan, we may encounter situations in which we provide or are offered business courtesies. Depending on the context of the situation, including the location, purpose and recipient of the business courtesy, what may be considered appropriate in one situation may be deemed unethical or illegal in another.



Business courtesies, which can include gifts, meals or other forms of entertainment, should be provided or accepted only when offered for a legitimate business purpose. When dealing with business courtesies, we must

ensure that the business courtesy in question:

- Does not violate local law, regulation or company policy or procedure;
- Could not be viewed as an inducement for a particular business decision;
- Is appropriate in terms of venue and frequency;
- Is not lavish or excessive in value and
- Is not cash or a cash equivalent.

While these guidelines are general, we should understand that, if a business courtesy feels wrong, it may be. If accepting a business courtesy could create a conflict of interest or suggest impropriety, it is important that we decline the courtesy or consult with the Legal Department or the applicable regional Compliance team as appropriate.

When we provide business courtesies, the compliance risks can be far more complex. Business courtesies provided to government officials can pose risks under anti-bribery and anti-corruption laws, which strictly regulate payments to government officials made as a means of inducing business; and business courtesies provided to healthcare professionals are highly regulated by national and international laws as well as industry codes of practice.

Any questions related to the appropriateness of a business courtesy should be directed to the Legal Department or the Corporate Compliance Department.

**Q:** A physician has informed me that, if we don't provide him with a gift in the form of re-modeling his office, he will no longer prescribe our products. I don't want to lose business, so what should I do?

**A:** Any gift provided by the company, regardless of value, that could be perceived as an inducement for a particular business decision is inappropriate. By implying that the company must pay to re-model his office in exchange for his continued prescription of our products, the physician has made an unethical request. You may not fulfill the physician's request or provide any other gift requested as part of a quid pro quo arrangement. You should report this matter to the Corporate Compliance Department as soon as possible and refrain from calling on this physician in a promotional capacity until you receive further guidance.

**Q:** It would be considered an insult in certain countries to refuse a gift from a business associate. How should I handle gifts in these countries?

**A:** Allergan respects the customs of individual cultures around the world. If you work in or travel to a country in which it would be considered disrespectful to turn down a gift, you should contact your supervisor or regional Compliance team to determine how to proceed. In some cases, you may be able to accept the gift as company property. You should remember that overly lavish gifts or gifts that appear to be intended to influence you are never appropriate regardless of cultural expectations.

## INTERACTING WITH HEALTHCARE PROFESSIONALS

In order for Allergan to understand the needs of the healthcare community and provide the highest quality products, we must regularly work and interact with healthcare professionals. Strict regulations govern our interactions with healthcare professionals, which include physicians, nurses, hospital or medical office administrators and those involved in prescribing or administering prescription medicines; and each one of us needs to be aware of the potential compliance risks inherent in these interactions.

While the relevant laws and regulations that govern interactions with healthcare professionals vary by country, we must ensure that any interaction we have with a healthcare professional:

- Serves an appropriate and ethical business purpose;
- Does not interfere with the healthcare professional's independent medical judgment and
- Does not violate local law, regulation or company policy or procedure.

Interactions with government-employed healthcare professionals or those reimbursed through government healthcare programs can pose additional compliance risks. The laws and regulations governing interactions with healthcare professionals strictly dictate what constitutes an acceptable interaction around the world, and the rules surrounding payments and business courtesies provided to healthcare professionals are stringent.

Given the risks inherent in our interactions with healthcare professionals, we must ensure that any interaction we have with a healthcare professional is ethical and in compliance with Allergan policies and procedures.

**SCENARIO:** You are a non-U.S. employee and have engaged a U.S. healthcare professional as a consultant in your local country. You have heard that Allergan is required to report payments made to U.S. healthcare professionals, but you are not aware of any similar requirement in your local country.

**BEST COURSE OF ACTION:** Allergan is required to report all payments and transfers of value provided by the company to U.S. healthcare professionals – regardless of the location of the service or payment. Additionally, there are provisions for increased transparency regarding payments made by the pharmaceutical industry to healthcare professionals around the world. You should consult your regional Compliance team with any questions regarding reporting on healthcare professional payments and follow local policies and procedures for recording such payments.



## PROHIBITING BRIBERY AND CORRUPT PAYMENTS

We are committed to creating business success through legal and ethical business practices. We prohibit any and all forms of bribery or corrupt payments, regardless of whether they involve government officials or those in the private sector. Bribery, which is defined as the offering of anything of value to an individual for purposes of inappropriately influencing a business decision or gaining an unfair business advantage, is banned by laws around the world.

These laws, referred to as anti-bribery and anti-corruption laws, are stringent and far reaching. They prohibit companies from offering or giving anything of value, directly or indirectly, to a government official, political party member or business representative for purposes of securing an improper advantage or obtaining or retaining business. Anti-bribery and anti-corruption laws also require that companies maintain proper financial records and employ internal accounting controls to ensure that improper payments are not concealed with falsified records.

### DID YOU KNOW – BRIBERY

Just offering or promising to make a corrupt payment can violate the law.

There is no minimum value rule as to what constitutes a bribe.

Bribery is not limited to cash or cash equivalents – anything of value can be a bribe.

We can be held accountable for the corrupt actions of third parties acting on our behalf.

Healthcare professionals working for government institutions like public hospitals or universities are considered government officials.



As employees of Allergan, each one of us, regardless of our location, is subject to the requirements of anti-bribery and anti-corruption laws. We must also be aware that anti-bribery and anti-corruption laws are not limited to the actions of Allergan employees – they also apply to the actions of third parties acting on our behalf. When selecting third parties, we must exercise caution and perform proper due diligence to ensure that we engage only those third parties that are committed to our high ethical standards.

Additionally, when dealing with healthcare professionals, it is important to remember that, in many situations, they can qualify as government officials. Around the world, healthcare professionals work in government-operated medical settings and serve as researchers or teachers in government funded educational institutes. As such, these healthcare professionals are considered government officials under anti-bribery and anti-corruption laws.

**SCENARIO:** You're reviewing the year-to-date spend for your group and notice that a third party was paid what appears to be an exorbitant amount for consulting services related to obtaining approval for a new product in China. The payment total is almost five times what consultants are typically paid for comparable work, and you are unable to locate supporting documentation for the spend.

**BEST COURSE OF ACTION:** While the specifics of this particular consulting relationship may be legitimate and legal, the information that you are aware of raises a red flag. Allergan policy prohibits bribery. It is not acceptable or legal to hire a consultant or any other third party to make corrupt payments on our behalf; and it is likewise unacceptable to ignore red flags that someone, either an employee or a third party, is making such payments.

If improper payments are being made or concealed with falsified financial entries, burying our heads in the sand and looking the other way are never acceptable options. You should raise the matter through an Allergan reporting channel as soon as possible so that the matter can be appropriately addressed.



## ENGAGING IN FAIR COMPETITION

Allergan products are sold based on their quality and efficacy – not because of dishonest or unfair competitive activity. Our commitment to creating business success through legal and ethical business practices extends to our interactions with competitors, customers and other third parties, as we must and do compete fairly.

Competition laws around the world serve to maintain fair market competition by governing practices that could potentially have an anti-competitive effect on the market. When dealing with competitors, we need to be cognizant of the information we share and avoid even the appearance of collusion. We must not engage in the following activities involving competitors:

- Discussing or sharing confidential information such as our current or planned pricing terms, contract terms, marketing strategy, distribution channels or supplier relationships;
- Coordinating pricing terms or agreeing to divide customer share or raise overall product cost in the market;
- Agreeing to boycott or exclude a customer or supplier or
- Obtaining a competitor’s confidential information through improper or unethical means.

When dealing with customers and distributors, we also share a responsibility to prevent anti-competitive practices. We must not share confidential information with a customer or distributor such as pricing terms for another party.

Additionally, we must also ensure that our selling methods comply with local competition laws, as selling practices such as tying the purchase of one product to the purchase of another or establishing a minimum resale price for a distributor may be illegal depending on applicable local law.

Any questions related to maintaining compliance with competition laws should be directed to the Legal Department.

**Q:** A neighbor of mine works in procurement for a competitor and often shares her company’s supplier pricing information with me. Is this okay, since I am not bringing up Allergan information?

**A:** It is not acceptable to discuss pricing terms, or any similar confidential information, with a competitor – regardless of whether or not you share Allergan information. You should communicate to your neighbor that you will not discuss such information with her. If she continues to share this type of information with you, you should remove yourself from the situation.

**SCENARIO:** On your way to call on a physician, you see a competitor’s sales representative leaving the physician’s office. On her way out, a folder falls out of her briefcase; and she does not realize it. The folder is labeled with the name of the competitor’s newly launched product. Any information you can get about this new product would be helpful to you and your sales team.

**BEST COURSE OF ACTION:** Allergan is committed to engaging in fair competition and winning business based on the quality and efficacy of our products. While we need to understand our marketplace and our competitors, it would not be ethical to read through or share a competitor’s confidential information that was clearly not intended for disclosure and is not publicly available. You should notify the sales representative before she leaves the building and return the folder to her without reading its contents.



## MAINTAINING TRADE COMPLIANCE

As a company with global operations, Allergan complies fully with all applicable international trade laws. As these laws limit our ability to engage in business interactions with or in certain countries, we must be mindful of relevant laws when conducting business internationally.

The export and re-export of goods, such as physical items or electronic exports of software technology or technical data, are highly regulated around the world. Any employee involved in the exporting or re-exporting of goods is responsible for ensuring that:

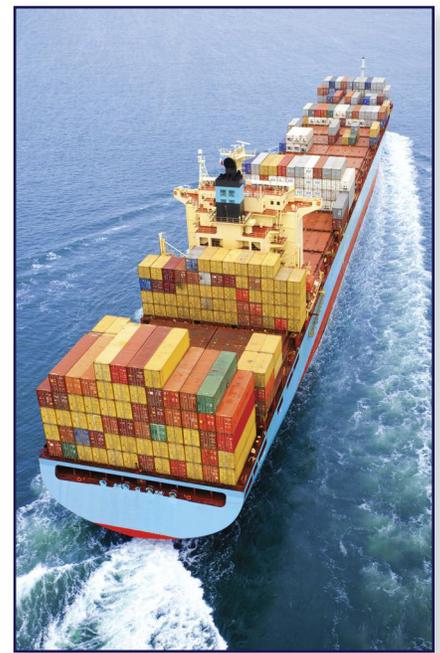
- The transaction is permitted by applicable law;
- The required documentation is complete and accurate and
- Any mandatory licenses are obtained prior to the export or re-export of goods.

While conducting business internationally, we must be aware of U.S. sanctions and embargos that prohibit Allergan, as a U.S.-based company, from shipping goods to or engaging in business with certain countries. Allergan must also comply with anti-boycott regulations, which prohibit U.S.-based companies from participating in foreign boycotts that have not been sanctioned by the U.S.

Any questions related to maintaining compliance with international trade laws should be directed to the Global Trade Compliance Department.

**Q:** If I believe that the documentation for a trade transaction does not indicate the intended final destination of the goods being shipped, what should I do?

**A:** All information included in trade documentation must be accurate to the best of our knowledge. If you are aware that the final destination of the goods being shipped is different than what is reflected in the documentation, you must update the documentation or work with the Global Trade Compliance Department to have this done.



**SCENARIO:** You recently shipped goods across border and now realize that the relevant documentation listed the value of the goods as lower than their actual value.

**BEST COURSE OF ACTION:** Incorrectly listing the value of goods that are shipped will impact the taxes applied to the trade transaction, such as custom duties or tariffs. Since the goods already shipped, you should report the discrepancy through appropriate channels, such as to your supervisor or the Global Trade Compliance Department, so that the error can be corrected and accurate taxes paid.

## AVOIDING CONFLICTS OF INTEREST

As employees of Allergan, we all share a duty to make decisions and take actions that reflect the best interests of the company. It can be difficult for us to make business decisions when our own interests are involved or when we find ourselves unable to be objective in the course of performing our job.

A conflict of interest arises when an employee's personal interests interfere, or give the appearance of interfering, with the interests of the company. In such situations, we must disclose the potential conflict of interest, real or perceived, to our supervisor and the Legal Department. We must also remove ourselves from making decisions that could be perceived as having been influenced by the conflict.

While a conflict of interest can arise in a multitude of situations in our day-to-day activities, the following are examples of circumstances that could lead to a conflict of interest:

- Holding a significant financial interest in a company that is a customer, supplier or competitor of Allergan or a company with which Allergan may enter into a potential business relationship;
- Pursuing a business interest personally that is in line with the business of Allergan;
- Receiving personal benefits, such as frequent or routine gifts or entertainment, as a result of employment with Allergan;
- Serving on a Board or Committee of any entity, including non-profit organizations, whose interests may conflict with those of Allergan and
- Participating in outside employment with or providing service to a customer, supplier, competitor or business partner of Allergan.

In addition, relationships with family members and friends can pose a conflict of interest if the family member or friend engages in any of the above examples or any other transaction that involves the company. We must all take care to ensure that our decisions are made without the influence of a conflict of interest, and we must disclose any potential conflict as soon as we become aware of it. Conflicts of interest are common and typically can be easily remedied if employees report them at the onset to the company.

Any questions about, or reports of, a potential conflict of interest should be directed to the Legal Department.

**Q:** My brother works for a potential vendor Allergan is considering contracting with to provide computer services. I am not in the Information Services organization and will have absolutely no involvement in vendor selection or any ongoing business relationship. Since there will be no interaction or possibility of influence, do I need to report this?

**A:** It is important that we avoid even the appearance of a conflict of interest. While this situation would not likely be considered a conflict of interest, you should report the relationship to the Legal Department so that the company is aware of it. You should avoid discussing Allergan or the vendor relationship with your brother going forward. In the future, should your role change to involve any interactions with the vendor or responsibilities for the relevant area, you should again notify the Legal Department and remove yourself from any decision-making involving the vendor.

## SAFEGUARDING CONFIDENTIAL INFORMATION

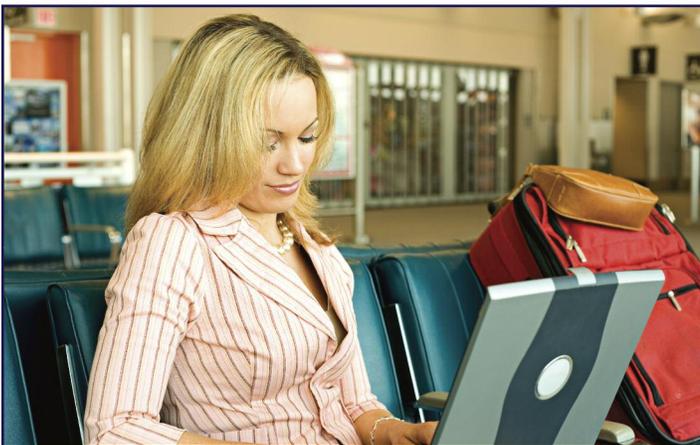
Allergan respects and protects the confidential information of its customers, suppliers, business partners, competitors and employees and likewise works to preserve the confidentiality of its own intellectual property and other confidential information. In today's digital age, we must be cautious when dealing with confidential information and work vigilantly to protect any such information we may come across in the course of performing our job.

Confidential information can include, among other things, patents, trademarks, trade secrets, business strategy information, product development or launch plans, manufacturing information, customer lists, employee information, marketing plans, pricing information, financial information, merger or acquisition plans and personally identifiable information.

As a company that develops innovative new products, our confidential information is a valuable asset. Accidental or unintended disclosure of our confidential information could negatively impact Allergan's business, competitive situation and intellectual property rights. Recognizing that our customers, suppliers and business partners equally value their own confidential information, we also have an obligation to safeguard their confidential information from disclosure.

**SCENARIO:** You received a call from a third party requesting confidential company information. The person calling you indicates that they work for an Allergan vendor and that they were forwarded to you by another Allergan employee – an employee whose name you recognize. The person also mentions that the request for information is rather urgent.

**BEST COURSE OF ACTION:** We all share a responsibility to preserve the confidentiality of company information. Just because someone claims to be from an organization that works with Allergan does not mean that they are who they say they are or that the information should be shared. Under no circumstances should you provide confidential company information without prior approval from the appropriate company department. You should take the caller's contact information and forward it to Human Resources, the Legal Department or the Corporate Media Relations Department, depending on the nature of the caller's request.



Additionally, the protection of personally identifiable information such as national identification numbers, contact information and credit card data, as well as protected health information, is regulated by data privacy laws around the world. We protect the confidentiality of any personally identifiable information entrusted to us.

As each of us works to protect the confidentiality of information in our possession, we must ensure that we:

- Obtain confidential information only as needed and in compliance with local law;
- Share confidential information only with those at Allergan that need to know the information for legitimate business purposes;
- Ensure confidential information is shared only with third parties who apply the same standard of security to the protection of information as Allergan and with whom we have a confidential disclosure agreement in place;
- Are careful and aware of our surroundings when discussing confidential information in public places and
- Never leave our laptop, company files or other sources of confidential information unattended in public places or in locations where the information may be accessed by third parties.

**SCENARIO:** While in an airport on business travel, you need to participate in a conference call to discuss the upcoming release of a new company product. The airport is crowded, and any comments you make may be overheard.

**BEST COURSE OF ACTION:** Discussing confidential information in public places is risky and should be avoided. Since the topic of the call, a new product release, is highly confidential, you should reschedule the call if possible. If you are unable to do so, you should limit your discussion of confidential information and take appropriate steps to prevent others from overhearing your conversation.



## PROHIBITING TRADING ON INSIDE INFORMATION

In the course of performing our job, many of us find ourselves with knowledge of non-public information about Allergan and other organizations. In addition to our duty to protect the confidentiality of this information, we also have a responsibility to refrain from engaging in insider trading while in possession of information that is considered material and non-public.

Material, non-public information includes any information that has not been disclosed to the public and that would be regarded as important in making an investment decision. While in possession of such information, we must not buy or sell publicly traded securities of the organization involved – whether it be Allergan or an Allergan customer, supplier, business partner or any other company with which Allergan is considering engaging in business.

Insider trading laws govern not only our ability to trade in securities while in possession of material, non-public information, but also the sharing of this information. We are prohibited from sharing material, non-public information with those that are not authorized to know the information, an act known as “tipping” information.



### DID YOU KNOW – MATERIAL INFORMATION

The following are examples of information that may be considered material, non-public information:

- A proposed merger or acquisition;
- Projections of earnings or losses;
- Significant regulatory or litigation developments;
- The development or launch of a new product;
- The gain or loss of a significant business relationship and
- Changes in company leadership.

Any questions related to trading while in possession of material, non-public information should be directed to the Legal Department.

**Q:** One of our suppliers has informed me that they just won a major contract with the government. Am I allowed to buy stock in the supplier, given that I do not work for them and the information will be released any day?

**A:** It is illegal to trade in securities while in possession of material, non-public information about the company in question. You are in possession of information that is material and that has not yet been disclosed, so you cannot buy stock in the supplier. Once the information is made public, you may buy the stock.

## PREPARING ACCURATE BUSINESS RECORDS AND FINANCIAL REPORTS

Allergan is committed to maintaining the trust of the investor community by making timely and accurate reports to the public and the U.S. Securities and Exchange Commission (SEC). Each one of us must ensure that company business records, which serve as the basis of our public disclosures and guide our business decisions, contain accurate, reliable and non-misleading information.

Business records include, among other things, accounting and financial data, timekeeping and payroll records, expense reports, customer and vendor records, invoices, manufacturing records and other essential company information. In handling business records, we must ensure that we:

- Follow all applicable laws, regulations and company policies and procedures;
- Accurately and fairly reflect the complete transaction or situation documented in the record;
- Approve records only after we have addressed any questions and verified their accuracy;
- Never fail to record a payment and
- Never falsify or delay records to achieve a more desirable outcome.

For employees involved in generating financial records, financial statements must conform to U.S. Generally Accepted Accounting Principles (GAAP). Additionally, financial reports and disclosures must contain all necessary information and be timely, accurate and clear.



**Q:** Since I am allowed to spend a certain amount on business meals per-person, do I have to record every person in attendance at the meal if the meal was so inexpensive that only entering half of the attendees keeps me below my maximum cost-per-person?

**A:** Business records must be accurate and complete. While the issue of cost-per-person is addressed by entering half of the attendees, to do so would create an inaccurate business record. You must include all attendees of the meal to create a complete and accurate record.

**SCENARIO:** Several large invoices for work that was recently performed come into your group a few weeks before year-end. It would be better for your group to hold off on processing the invoices until the new year so the charges won't hit this year's budget.

**BEST COURSE OF ACTION:** As expenses must be recorded in the period the services were incurred, you must not delay processing the invoices for payment. Delaying payment or accrual of expenses for the invoices until the next calendar year would create the appearance of lower-than-actual operating costs for the current year, which could mislead investors about the company's performance.

## MANAGING INFORMATION AND RECORDS

At Allergan, we recognize the importance of managing the life cycle of the records we create. Laws and regulations around the world dictate not only that certain records be created but also that they be retained for specified periods of time. As we work towards achieving our business goals, we comply fully with all applicable record creation and retention requirements.

We all share a responsibility to understand these requirements and ensure that records are preserved in accordance with applicable retention periods. It is important to note that records are not limited to physical paper documents – electronic data and files also qualify as records and are likewise subject to retention requirements.

We must be mindful of situations in which we may be required to maintain records for periods longer than those dictated by retention requirements. Document holds due to litigation, audits or investigations may necessitate the preservation of relevant records; and employees must ensure that records related to such holds are held from destruction.

In addition to our requirements to retain records, we must also recognize the importance of and risks inherent in record creation. Any records we create in the workplace or while performing our job represent Allergan. We must be mindful that any one of our records may be viewed by those we did not intend, such as the media, the government or a court of law, and use sound judgment when creating records. Our records must be accurate and professional, and we should avoid documenting information that could be misunderstood or taken out of context.

This is especially true of emails, as we often afford ourselves more freedom in drafting emails than we would in business reports, presentations or official memorandums. We should never generate a record that we would not want made publicly available.

**Q:** A colleague keeps sending me emails containing jokes about the work we do. I know that the comments are intended to be sarcastic, but I am concerned that someone else reading them might not understand her tone. Should I say anything?

**A:** When creating records, such as emails, we must be mindful that they may be read by those we did not intend. Your colleague's emails could be accidentally sent or forwarded to an unintended recipient or they could be made public as part of an investigation or legal matter. If you feel comfortable discussing the issue with your colleague, you should remind her that any records we create should be accurate and professional and should avoid documenting information, such as sarcastic jokes, that could be taken out of context. If you do not feel comfortable discussing this, you should report the matter through an Allergan reporting channel.

### DID YOU KNOW – RECORDS

A record is more than just a piece of paper. The following are all types of records:

Official paper documents;

Working papers such as drafts, versions, photocopies or handwritten notes;

Electronic correspondence such as email;

Electronic data such as data retained in databases, shared drives, hard drives or removable media;

Electronic backup media and

Website content.



### PROTECTING COMPANY ASSETS

As employees of Allergan, we all have a duty to protect company assets. These assets, which include both physical items, such as buildings, computers, furniture, office supplies and equipment, and informational assets, such as intellectual property, work documents and electronic information, contribute to the company's business success and should be used only for legitimate business purposes.

We must ensure that our use of these resources is appropriate and responsible. We must be committed to handling the company's physical assets with care and safeguarding the company's informational assets, which includes protecting physical items such as computers and storage devices that contain confidential information.

When we misuse Allergan assets or handle them carelessly, we can negatively impact the company's ability to meet stockholder obligations and bring innovative, new products to the market. Under no circumstances may we abuse company assets, use them for personal gain or use them for an improper or illegal purpose.

**SCENARIO:** You are aware of an ex-Allergan employee who is using information about one of our products, learned during her employment with Allergan, at her new company.

**BEST COURSE OF ACTION:** Our obligation to protect Allergan assets extends even after we are no longer with the company. While it would be acceptable for the ex-employee to use generally available information learned during her employment with Allergan, such as process improvement methodologies or effective sales techniques, it is not acceptable for her to use Allergan confidential information at, or share it with, her new company. The information is the property of Allergan, and you should report the issue through a company reporting channel immediately.



## COMMUNICATING ON BEHALF OF THE COMPANY

Allergan's reputation in the healthcare industry and in the communities in which we operate is based in part on the information we publicly communicate. To prevent the release of conflicting or mis-information, we must ensure that communication made on behalf of Allergan is issued only through appropriate company channels.

Communication with investors, including the issuing of financial reports, is the responsibility of the Investor Relations Department, while all media inquiries are handled by the Corporate Media Relations Department. Only employees in these respective groups, or members of senior management, may speak or issue communication to these audiences on behalf of the company.

When discussing the company or responding to questions from third parties, we must be mindful to avoid giving the appearance that we are speaking on behalf of the company. Anything we communicate can be viewed as an official statement from Allergan, and this could undermine the position of the company. It is important that we remember that anything we post about the company on social media sites can be construed as official Allergan communication, and we must take steps to make it clear that we do not speak for the company.

If we are approached with an inquiry about the company or a request for a company statement, we should refer the requesting party to the Investor Relations or Corporate Media Relations Department as appropriate. In cases in which a government or regulatory agency requests company information, the Legal or Regulatory Affairs Department should be consulted as appropriate prior to the communication or transfer of information.

**Q:** I have been receiving calls from reporters asking about the company. Is there something I should say when I get these types of calls?

**A:** Unless you are authorized to speak on behalf of the company, you should not answer any external questions about Allergan. You should indicate to the callers that you are not authorized to speak on behalf of the company and then forward them to the Corporate Media Relations Department for handling.

**SCENARIO:** On a social media site, your profile indicates that you work for Allergan. A friend posts to your page that she is considering receiving treatment with an Allergan product for an off-label indication. You have seen data suggesting that the product will likely be successful in treating your friend's condition and would like to reply to your friend's post to help her with her decision.

**BEST COURSE OF ACTION:** When posting to and communicating via social media sites, you must be careful to avoid even the appearance of speaking on behalf of the company. Since your profile indicates that you work for Allergan, any response about an off-label indication for one of our products could be viewed as the company promoting an off-label use of one of our products. You should not respond to your friend's post with any off-label information or recommendation that she pursue the product for off-label treatment.

## PARTICIPATING IN POLITICAL AFFAIRS AND PUBLIC POLICY

At Allergan, we believe that we have a responsibility to patients, the medical community and the communities in which we operate to advocate for public policies that advance the treatment of unmet medical needs and provide a sound economic basis. We are committed to championing the development of legislation and regulations that ensure patients have access to innovative products that will enable them to live life to its greatest potential.

As part of this commitment, we provide government officials with educational materials to increase awareness of certain health conditions, legislative briefings on key issues and research that enables them to make well informed decisions.

The laws governing our contribution to public policy and the political process are complex and vary from country to country. Any employee involved in our public policy efforts around the world must ensure that:

- They follow all applicable laws, regulations and company policies and procedures;
- Interactions with government officials are ethical and do not violate anti-bribery and anti-corruption laws and
- The ultimate needs of patients are the focus of our efforts.

Any contribution to a political party or candidate on Allergan's behalf must be approved by the Government Affairs Department, the Legal Department or the Corporate Compliance Department; and any use of an Allergan facility for political purposes must be approved by the Legal Department.

Employees are encouraged to participate in local government and the political process, but this participation must be on an individual basis and not on company time. We may not use company assets to support our personal political activities, and we must ensure that our participation in political activities is clearly our own and not seen as a statement or action on behalf of Allergan.

**Q:** Am I allowed to send my co-workers emails from my Allergan email regarding a political movement I am fervently supporting?

**A:** Company assets, such as the email system, should not be used for personal political activities. You are more than welcome to discuss political matters with colleagues that are interested, but you may not send emails from the company's email system or send emails from your personal email to your colleagues' Allergan email addresses regarding political matters.

**Q:** I understand that we are supposed to limit our interactions with competitors. Is it acceptable to collaborate with competitors, as industry counterparts, to help in the development of public policy that supports biomedical research?

**A:** It is acceptable to collaborate with competitors for the purpose of supporting public policy that ultimately aids patients, but this collaboration must at all times be ethical and should be limited. Any proposed collaboration with competitors must be approved by the Legal Department prior to the commencement of any joint efforts to ensure that the collaboration is appropriate and in the best interest of patients.



### PROVIDING CHARITABLE CONTRIBUTIONS AND GRANTS

Allergan is committed to creating a positive impact in the communities in which we live and work. With our business focused on providing quality products that improve patients' lives, we recognize the importance of contributing to better healthcare and to a better world overall.

The Allergan Foundation and The Allergan International Foundation, private charitable foundations founded by Allergan, work to better our communities by providing grants and charitable contributions to non-profit organizations throughout the world. These foundations focus on philanthropic areas such as the arts, civic programs, education and health and human services.

In addition to the charitable work done by The Allergan Foundation and The Allergan International Foundation, Allergan works to better patient care by supporting independent educational activities intended to foster increased understanding of scientific, clinical or healthcare issues in healthcare professionals and patients. The company also provides charitable assistance in the form of free Allergan products to improve medical care for impoverished populations around the world. These efforts include providing products to charitable organizations, to healthcare professional missionary programs and through Allergan contracted third parties.

All charitable and philanthropic endeavors undertaken by Allergan, The Allergan Foundation and The Allergan International Foundation are for the betterment of our communities and to help those in need. At no time do we provide charitable contributions or grants, including financial support, medical education grants or free Allergan products, in an effort to induce a healthcare professional to prescribe or purchase Allergan products.

#### ALLERGAN CHARITABLE RESOURCES

Grant requests and additional information about The Allergan Foundation can be found on the foundation's website at <http://www.allerganfoundation.org/>.

The Allergan International Foundation can be contacted via email at [ML-Allergan\\_International\\_Foundation@Allergan.com](mailto:ML-Allergan_International_Foundation@Allergan.com)

Healthcare professionals who wish to provide Allergan products as part of a missionary program may send a letter request, including information about the quantity of products requested and the logistics of the medical mission, to Allergan Customer Service, Attn: Medical Missions AND-1D, P.O. Box 19534 Irvine, CA 92623 or via fax to (714) 796-3209.



The Allergan Foundation Improving Lives. Elevating Communities

## PROTECTING THE ENVIRONMENT

As we work to improve patient health and contribute positively to the communities in which we work and live, Allergan is committed to providing safe and healthy working environments for our employees and to reducing the environmental impact of our operations, products and services. We apply consistent environmental, health and safety standards across our global sites to ensure that we comply with all applicable laws and regulations and that our efforts to reduce our environmental impact are as effective as possible.

As part of our environmental, health and safety program, we strive to:

- Work in partnership with regulatory agencies to ensure that we follow all applicable laws and regulations;
- Prevent adverse incidents involving our employees and local communities;
- Conserve natural resources;
- Minimize or eliminate the use of hazardous material;
- Develop and manufacture our products in a manner that minimizes environmental impact and encourages recycling and
- Continuously improve our environmental, health and safety efforts.

We all share a responsibility to support the company's environmental, health and safety efforts, including following all applicable company policies and procedures. For those of us involved in engaging third parties, we have a duty to engage only third parties that support our commitment to the environment, health and safety and impose a similar commitment in their own organization.

### ALLERGAN'S COMMITMENT TO SUSTAINABILITY

Detailed information about our commitment to the environment, health and safety as well as sustainability can be found on our website at [http://www.allergan.com/responsibility/environmental\\_health\\_and\\_safety.htm](http://www.allergan.com/responsibility/environmental_health_and_safety.htm)



## PROVIDING AN EQUAL EMPLOYMENT OPPORTUNITY

It is Allergan's policy to afford equal employment opportunity to all individuals, regardless of race, creed, color, religion, sex, national origin, ancestry, age, marital status, veteran status, disability, medical condition, sexual orientation or other legally protected characteristics. We comply with the equal employment opportunity requirements of all locations in which we do business; and we are committed to equal opportunity throughout the employment process.

## CREATING A POSITIVE WORKING ENVIRONMENT

As Allergan works to achieve business success while operating ethically, our employees are our greatest strength. Knowing that each one of us contributes to the success and reputation of Allergan, the company is committed to providing a positive working environment whereby we, as employees, feel comfortable and inspired.

We all have the right to work in an environment free from any form of harassment, discrimination, intimidation or retaliation. Allergan will not tolerate any such behavior – whether it be from an employee or a third party with which we do business. Every employee is expected to treat those that they encounter while performing their job with respect and dignity.

We should feel comfortable at work, and part of that includes working in an environment free from issues with alcohol or drugs. Employees may not bring these substances onto company property or to company events, and no employee may engage in work for Allergan while under their influence.

It is up to each one of us to support and maintain a positive working environment at Allergan, and the company asks that we each do our part to foster the kind of productivity that is inherent when people enjoy their jobs.

**Q:** I am trying to fill an open position that requires a fair amount of manual labor and heavy lifting. Is it discrimination if I don't hire a candidate because he cannot handle the role's physical requirements?

**A:** If the candidate cannot perform the essential job functions of the position with a reasonable accommodation, it would not be discriminatory to reject the candidate and look for other candidates. If, however, the candidate could perform the essential functions of the position with a reasonable accommodation from Allergan, the candidate may not be removed from consideration solely for this reason.

**Q:** One of my colleagues keeps telling jokes that are demeaning to certain minority groups and women. No one else seems to mind his jokes, and I don't want to be seen as having no sense of humor. What should I do?

**A:** Your colleague's behavior is inappropriate. Jokes that create a negative or hostile work environment are not acceptable in the workplace, regardless of how many people involved enjoy them. If you feel comfortable raising the issue with your colleague, you are encouraged to let him know that his jokes make you feel uneasy. If you do not feel comfortable discussing the issue with him, or if he does not respect your request that he stop making inappropriate jokes, you should raise the issue to your supervisor or through another company reporting channel.



## SPEAKING UP AND REPORTING CONCERNS

As we work to maintain a positive and ethical business environment at Allergan, we all have a part to play. Our individual decision making and behavior can influence both our colleagues and the company, and we must strive to set a positive example.

Our expectations of ethical and compliant behavior should not be limited to our own actions. We should expect nothing less of our colleagues and those we interact with from third parties. If we become aware of an issue that may compromise Allergan's commitment to ethical conduct and compliance with all applicable laws, we need to speak up. Allowing unethical or potentially illegal behavior to continue or to go overlooked can have severe consequences for both the company and for individual employees.

Allergan has afforded us with several options for reporting concerns and raising questions; and we have a duty to the company, to our colleagues and to ourselves to preserve Allergan's reputation as a trusted provider of quality products.

### KNOW YOUR RESOURCES FOR RAISING CONCERNS

All of the following resources are available to you for speaking up and reporting concerns:

- Your supervisor;
- Your Human Resources representative;
- The Chief Compliance Officer;
- The Corporate Compliance Department or
- The EthicsHelp Line.



**There is no right way**

**to do a wrong thing.**

**Our pursuit. Life's potential.**

