



# LEADING WITH INTEGRITY

CODE OF CONDUCT





## A MESSAGE FROM OUR CEO AND PRESIDENT

Dear Colleagues:

We are a **BOLD** company. We have an amazing opportunity to deliver high-quality products to healthcare providers and their patients who depend on us to do what's right – always.

Our Code of Conduct, *Leading with Integrity* (“Code”), is a guide to help us always do what is right. Our Code illustrates the values that define who we are as a company and provides resources to assist us in making sound decisions every day. You should refer to it as you work and seek guidance if you are ever unsure of the proper course of action.

Our company evolves in response to the needs of patients, our stakeholders, the regulators and the market; however, our **BOLD** position to always do what is right never waivers. We use good judgment and never compromise our values. If you suspect behavior that goes against our Code, the law or our policies, speak up. We do not tolerate any retaliation against a colleague who raises a concern in good faith.

Let's continue to serve our industry and our patients, customers and shareholders transparently, fairly and honestly. Let's continue to be **BOLD** in our work and in building an incredible future together. Thank you for all of your hard work and continued commitment to making Allergan great.

### **Brent Saunders**

Chief Executive Officer and President  
Allergan



# OUR FOUR KEY ACTIONS

**Living Bold** means we:

**BUILD BRIDGES**

**POWER IDEAS**

**BOLD**

means doing  
what is right

**ACT FAST**

**DRIVE RESULTS**



# Table of Contents

## A Message From Our CEO and President

## What Living Bold Means

## We Do What's Right

Our Compliance Program

Our Code of Conduct

Our Responsibilities

Our Resources for Raising Concerns

Protection From Retaliation

## We Ensure Patient Safety and Product Quality

Researching and Developing Our Products

Accurate Product Information

Quality Products

Counterfeit and Suspicious Products

Adverse Event Reporting

## We Interact Responsibly

Compliance With Laws and Regulations

Product Promotion

Business Courtesies

Interactions With Healthcare Professionals

Transparency

Relationships With Suppliers

Working With the Government

Anti-bribery and Anti-corruption

Fair Competition

Trade Compliance

Money Laundering

## We Protect Our Company

Conflicts of Interest

Confidential Business Information

Data Privacy and Protection

Inside Information

Financial Integrity

Records Management

Company Assets

## We Are Responsible Citizens

Speaking on Behalf of Allergan

Political Affairs and Public Policy

Charitable Contributions and Grants

Environmental, Health and Safety

Human Rights

## We Take Care of Each Other

Equal Employment Opportunity

Anti-harassment and Anti-discrimination

Workplace Violence

Helpful Resources



# WE DO WHAT'S RIGHT

Our ethical conduct and the success of our company go hand-in-hand. To be **BOLD**, we keep integrity at the heart of everything we do.



## OUR COMPLIANCE PROGRAM

We are part of a global, engaged workforce that is dedicated to improving patient care. That dedication has earned us the trust of patients, physicians, the community and those with whom we do business. How do we preserve the trust people place in our company? By doing business the right way, in every decision and every action.

To support these efforts, we have a comprehensive, global compliance program, led by our Global Compliance Department. The Global Compliance Department, under the guidance of our Global Chief Compliance Officer, and oversight by the Audit and Compliance Committee of the Board of Directors, works closely with all Allergan colleagues to ensure we maintain compliance with the law and act in accordance with our values and our Code of Conduct. Though the Global Compliance Department drives our compliance efforts, working with integrity is everyone's responsibility.



Allergan maintains an organizational culture that encourages integrity and a commitment to compliance with the law and our policies. There are many components to our compliance program including:

- *Written standards and this Code of Conduct*
- *Training on, and communication of, our standards*
- *Risk assessments, monitoring and reviews*
- *Anonymous reporting and communication by our colleagues through the Allergan Integrity Action Line*
- *Investigations of reports of non-compliance, followed by appropriate corrective and disciplinary action*
- *Due diligence and screening of colleagues and business partners, as allowed by law*

## OUR CODE OF CONDUCT

Our Code of Conduct is an important resource that represents who we are as a company as well as defines our commitment to maintaining high ethical standards. It is a critical component of our compliance program and provides guidance to help each of us make the right decisions every day. Consult it often, uphold our values and bring our Code to life in everything you do at Allergan.

## OUR CODE APPLIES TO EVERYONE WHO CONDUCTS BUSINESS ON OUR BEHALF

Because our Code embodies our company's values, it provides guidance to everyone, including:

- *Colleagues*
- *Supervisors*
- *Officers*
- *Board of Directors*
- *Business partners*
- *Vendors and contingent workers*

## HONORING OUR COMMITMENT

We expect everyone to do what's right and to protect our reputation. Our Code of Conduct provides guidance and tools to help you navigate the situations you face every day, but it doesn't cover everything: no Code does. Use it to assist you in your decision making and seek help if you ever need additional guidance. In addition to the Code, you are required to be aware of and comply with global and local policies impacting your role. Because our commitment to doing business with integrity is critical to our company's success, we take any violation of our Code and our policies seriously.

We believe that there's no right way to do a wrong thing. Anyone who violates our Code, our policies or the law may be subject to disciplinary action, in accordance with applicable law. Violations of the law can have additional consequences, such as criminal prosecution, imprisonment and fines.



## OUR RESPONSIBILITIES

Every Allergan colleague is responsible for compliance. The Global Compliance Department provides guidelines for ethical behavior, as well as tools and resources to help you navigate daily responsibilities, but each of us plays an important role in the continued success of our company. Strive to create an even better Allergan by following our Code, understanding your obligations and helping our company grow with integrity.

As a colleague, you have a responsibility to:

**Work with integrity.** Be honest, open and transparent. Follow our Code, policies and applicable law and never compromise our values.

**Review our Code.** Read it and refer to it often in your work. Look to it for guidance when you are faced with an ethical dilemma (i.e., where you need to decide how to do the right thing).

**Ask questions.** If you're unsure of something, use the resources we've provided to seek help before moving forward or seek help from your supervisor or another member of management.

**Speak up.** If you see or suspect unethical behavior, report it so that we can address the matter. Never keep silent about any activity that goes against our company values.

**Cooperate.** Respond to any requests you receive as part of an investigation and always provide complete, accurate and timely information.

If you supervise others, you have an even greater responsibility:

**Lead by example.** Demonstrate what it means to live **BOLD** through your words and actions, including always doing what is right for the company. Consult our Code often and encourage your team to do the same.

**Keep an open door and be accessible.** Encourage colleagues to come to you with questions and listen to their concerns. Educate them about our Code and policies to help them make ethical choices. Discuss ethical issues and strive to maintain a culture of integrity.

**Foster an environment of non-retaliation.** Never retaliate against a colleague who raises an issue in good faith (i.e., because they genuinely believe it to be true), and take action to prevent retaliation against members of your team by others.

**Seek guidance.** Even as a supervisor, you might learn of or face a situation where you're unsure of the proper course of action. If that happens, or if you ever have questions, ask for help.



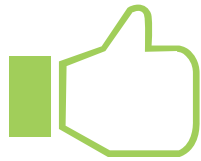
## MAKING SMART DECISIONS

SOMETIMES, THERE WILL BE SITUATIONS YOU ENCOUNTER THAT ARE NOT COVERED IN OUR CODE. IN THOSE CASES, WE TRUST YOU TO USE GOOD JUDGMENT AND MAKE CHOICES THAT REFLECT POSITIVELY ON OUR COMPANY.

HOW WILL YOU KNOW WHICH DECISION IS THE RIGHT ONE? ASK YOURSELF:



Is it legal?



Is it ethical  
(does it feel right)?



Does it comply  
with the spirit of  
our policies and  
our Code?



Is it consistent  
with our values?



Would I feel  
comfortable if  
it was made public?



Do I feel comfortable  
telling my family  
about what I  
am doing?

If you answered **“NO”** or if you’re unsure:

↓ **STOP** ↓  
**RECONSIDER**  
↪ **SEEK HELP** ↩





## Watch out for warning signs.

If any of these thoughts enter your mind, step back, re-evaluate what you're about to do, and seek help:

- *Everyone else is doing it.*
- *Who is going to know?*
- *I'm not sure about this, but I don't want to lose a customer.*
- *That's just the way they do business here.*
- *We can't afford another delay.*
- *It's just this once.*
- *That's not my job.*
- *The ends justify the means.*

## OUR RESOURCES FOR RAISING CONCERNS

Part of our responsibility to protect our reputation includes speaking up when we believe our Code, policies or the law are being violated.

There are several ways to speak up:

**Talk to your supervisor.** If possible, seek help from your supervisor first. Often he or she will be able to answer questions, offer advice and help manage the situation.

**Share your concern with another appropriate resource.** If you do not feel comfortable sharing your concern with your supervisor, you can share it with another supervisor or any of the following resources:

- *The Legal Department*
- *The Global Compliance Department*
- *Your Human Resources representative*
- *Corporate Security*
- *The Allergan Integrity Action Line*

**Contact the Allergan Integrity Action Line.** The Allergan Integrity Action Line is another resource we provide you to share concerns. It is operated independently by a third party and is available 24/7, from any location around the world. If you do not feel comfortable sharing your name or other personal details, you can report your concern anonymously, where permitted by law. In certain situations, local law may limit what issues can be reported through the Allergan Integrity Action Line.



## OUR RESOURCES FOR RAISING CONCERNS (continued)



### HOW DO I CONTACT THE ALLERGAN INTEGRITY ACTION LINE?

Visit [AllerganIntegrityActionLine.ethicspoint.com](https://AllerganIntegrityActionLine.ethicspoint.com) to submit a report online or find your country's local number.

No matter which way you decide to speak up, we will limit access to the information you share to the fullest extent possible, as required to take appropriate action. Any concerns you raise will be taken seriously, investigated fully and impartially and addressed promptly. Remember that we never tolerate retaliation against anyone who raises a concern in good faith.

**Q:** What if you suspect that a colleague might be making some unethical payments? You do not want to get him in trouble if he is not doing anything wrong and you do not have proof that anything improper occurred. Should you still speak up?

**A:** Yes. If you honestly believe that something unethical has taken place or will take place, you should raise the issue, even if it is later found to be unsupported. We need to know so that we can investigate the matter and respond appropriately. You will not get into trouble for reporting a suspicion or concern in good faith, even if it turns out you were wrong.



## PROTECTION FROM RETALIATION

We want you to feel comfortable coming forward when you know or suspect that our Code, the law or our policies are being violated. That's why we never tolerate any form of retaliation against anyone who raises a concern in good faith.

Without legitimate business reasons for performing any of these actions, retaliation can potentially look like:

**Passing** a colleague over for a promotion or important project

**Excluding** a colleague from a meeting or training session

**Giving** a negative performance evaluation

**Demoting** or firing a colleague

We take retaliation claims seriously and investigate them thoroughly. Anyone who engages in retaliation will be subject to disciplinary action.

**Q: My supervisor asked me to do something that's against the law. If I report the issue, I'm worried that my supervisor will find out. What should I do?**

*A: It is important that you report your concern so we can investigate the issue. There are many options at your disposal to report a matter, even if you do not feel comfortable raising it with your supervisor. You can reach out to other individuals in our company for assistance or use the Allergan Integrity Action Line to share your concern by visiting [AllerganIntegrityActionLine.ethicspoint.com](https://AllerganIntegrityActionLine.ethicspoint.com) to submit a report online or find your country's local number. If, at any point after reporting your concern, you feel as though your supervisor or anyone else in the company is retaliating against you, you should speak up about it as soon as possible. We will investigate the matter and, if we find that someone was engaging in retaliatory conduct, we will take action.*





# WE ENSURE PATIENT SAFETY AND PRODUCT QUALITY

Our company **powers ideas** by developing innovative products that improve patients' lives. We find better ways to get things done and we passionately support the best ideas. We're proud of our products and work to ensure they are developed under high quality and safety standards. We never jeopardize patient safety, product quality or compliance.



## RESEARCHING AND DEVELOPING OUR PRODUCTS

Our research and development activities are focused on creating new products that address unmet medical needs and increasing global access to high-quality, affordable medicines that enhance our patients' quality of life.

Developing safe products is a commitment we all share. It applies to all phases of the lifecycle of our products — from development through patient use. That's why we work to meet or exceed the most stringent standards that apply to our company and comply with industry standards of conduct, including Good Clinical Practices, Good Manufacturing Practices, Good Laboratory Practices and Good Pharmacovigilance Practices among others.

We are also committed to treating the subjects of our research ethically.

**Human subject testing** - Our policies, processes and controls aim to protect the health, safety and well-being of human research participants and respect the laws, regulations and culture of the countries where our studies are conducted.

**Animal welfare** - We conduct animal research in a responsible and humane manner. Our company also supports the development and adoption of non-animal test methods to reduce and replace animal testing.

When engaging in research and development activities, always:

**Follow** applicable laws, regulations, our Code and policies.

**Do** so with integrity, in accordance with the latest scientific standards.

**Speak** up whenever you have a question or concern.

**Q:** What if data from a clinical trial suggests that there's a safety issue with one of our products? Some of my colleagues advised that I should hold off on reporting the issue to avoid any delays in the product's release. Should I wait?

**A:** No. You should report it right away according to the guidelines in the policy for reporting adverse events and other safety information. If the product is released without further investigation, the issue could pose a risk to patients. We never jeopardize patient health to get a new product on the market or get it approved quicker.

*Patient safety and integrity drive all of our research and development efforts.*



### FIND OUT MORE

More information about our clinical trials can be found at:  
<http://www.allerganclinicaltrials.com/>  
 and <http://www.clinicaltrials.gov/>



## ACCURATE PRODUCT INFORMATION

We carefully assess the risks and benefits of our products before placing them on the market. It's critical that patients and physicians also understand these risks and benefits before making treatment decisions, which is why we take our responsibility to provide complete and honest information about our products very seriously.

You play an important role in ensuring the claims we make about our products are accurate, fair, balanced and consistent with scientific evidence. Never modify any portion of clinical data or the labels of our products without prior approval.

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

**A: Yes. Existing laws and our policies require all physicians conducting such trials to completely and accurately report the results of their study, regardless of the outcome, just as we completely and accurately report the results of our clinical trials. You should notify the Medical Affairs Department as soon as possible.**



*We take our obligation to provide trustworthy information about our products seriously — making all clinically significant findings of our research publicly available and disclosing our support for any publications that result from research financially supported by our company. We also work with regulators to develop accurate, complete and up-to-date label information about the safety and approved uses of our products.*



## QUALITY PRODUCTS

We develop our products with patients in mind and are dedicated to ensuring they receive safe, high-quality products. Our commitment to quality has allowed us to earn the trust of patients and physicians around the world.

We maintain their trust every day by:

**Evaluating** and evolving our systems and processes to support the best ideas and find better ways to get things done.

**Following** stringent applicable guidelines.

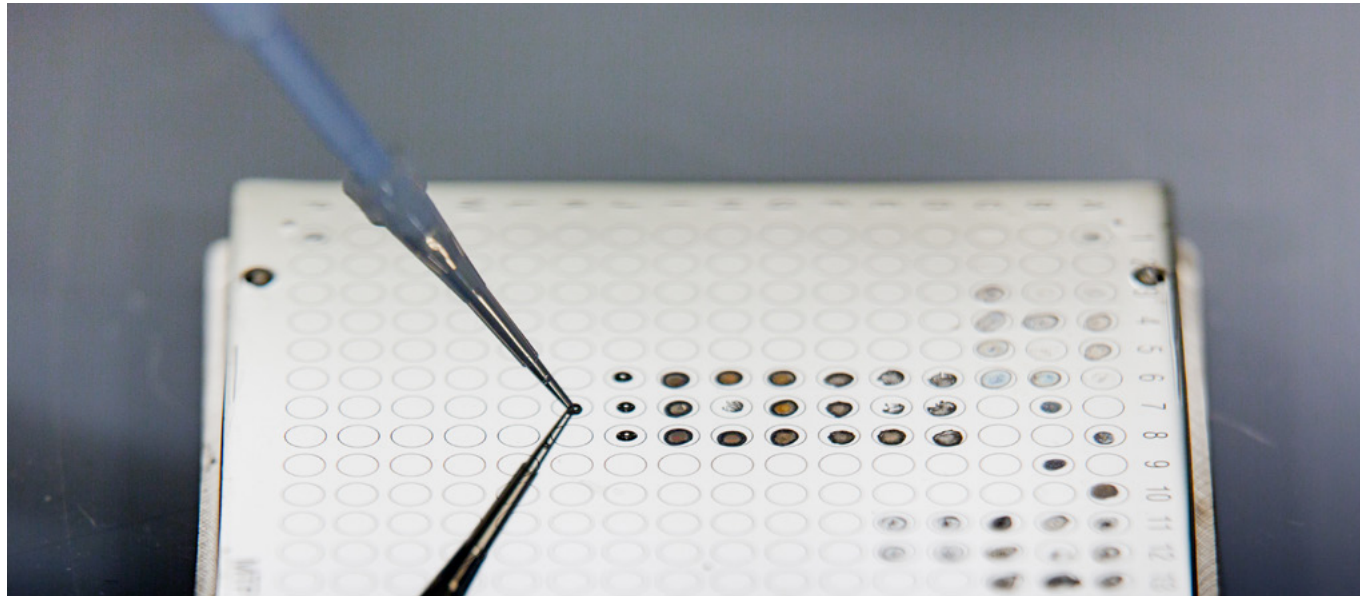
**Testing** our products to ensure that only those meeting our quality standards reach the market.

**Assessing** the performance of our products throughout their shelf life to ensure quality and reliability.

You have a responsibility to ensure that we continue producing quality products by always making patient safety a priority, adhering to high standards and never sacrificing quality to meet a company target or deadline. If you see or suspect activity that goes against our commitment, speak up.

**Q: I think there may be an issue with one of the manufacturing processes at my facility but we are behind schedule and if I say anything, we will be delayed further. What should I do?**

**A: Allergan never sacrifices quality to meet a deadline or target. All issues or deviations relating to manufacturing processes need to be investigated and evaluated by the quality unit as part of our normal release process. You should report the matter immediately to your supervisor or directly to the quality unit at your facility. If you're not comfortable reporting the issue, or if a quality unit doesn't exist at your facility, the issue can be reported to the Allergan Integrity Action Line.**



*People look to our company to produce high-quality, safe and effective products. We maintain that trust by delivering on our promises and ensuring we meet these high standards.*



## COUNTERFEIT AND SUSPICIOUS PRODUCTS

We always put patient safety first. That is what has earned Allergan the trust of patients and is one of the reasons for our success. It's also why we develop and distribute our products ethically, in accordance with high standards. Counterfeit and suspicious products put patients at risk.

**Counterfeit products** are pharmaceutical medicines and devices that have been mislabeled or fraudulently manufactured, typically with the intent to make them appear to be genuine.

Know the risks:

- *Patients using counterfeit products may not receive the expected benefit because the product may contain none or too little of the active ingredient or it hasn't been manufactured properly and may malfunction.*
- *Counterfeit products may also contain dangerous contaminants or too much of the active ingredient, which could be harmful.*

**Suspicious products**, including ones purchased from unlicensed online pharmacies/suppliers, present additional hazards.

Know the risks:

- *Medicines and devices that are manufactured outside of our facilities may not be subject to the same standards for quality, safety or effectiveness.*
- *Label information could be inadequate, misleading or in a language that the patient does not understand.*

Allergan works in collaboration with the U.S. Food and Drug Administration and other government regulators to combat counterfeiting.

*By following our policies and reporting counterfeit and suspicious pharmaceutical medicines and devices, you help ensure that patients receive authentic Allergan products that have been properly tested and found to meet safety requirements.*

**Q:** I came across a website claiming to sell legitimate Allergan products for a significantly lower price. The website doesn't appear to be genuine and affiliated with the company. What should I do?

**A:** You should report the issue as soon as possible to the Global Security Department. Any person or company alleging to sell our products and not associated with our company may be selling something that's counterfeit. We need to look into the matter immediately and may need to involve the authorities.





## ADVERSE EVENT REPORTING

Reporting and monitoring adverse events is one of the ways we ensure the safety of the products we place on the market. Our company has both a legal and ethical obligation to report this information to government regulatory authorities.

You may learn about an adverse event or issue at work or outside of work. Whenever you learn of an undesirable experience regarding the use of one of our products, you have a responsibility to report it within 24 hours from when you receive the information, even if you're not sure whether our products caused the adverse event. Please reference the policy for reporting adverse events and other safety information for additional guidance.

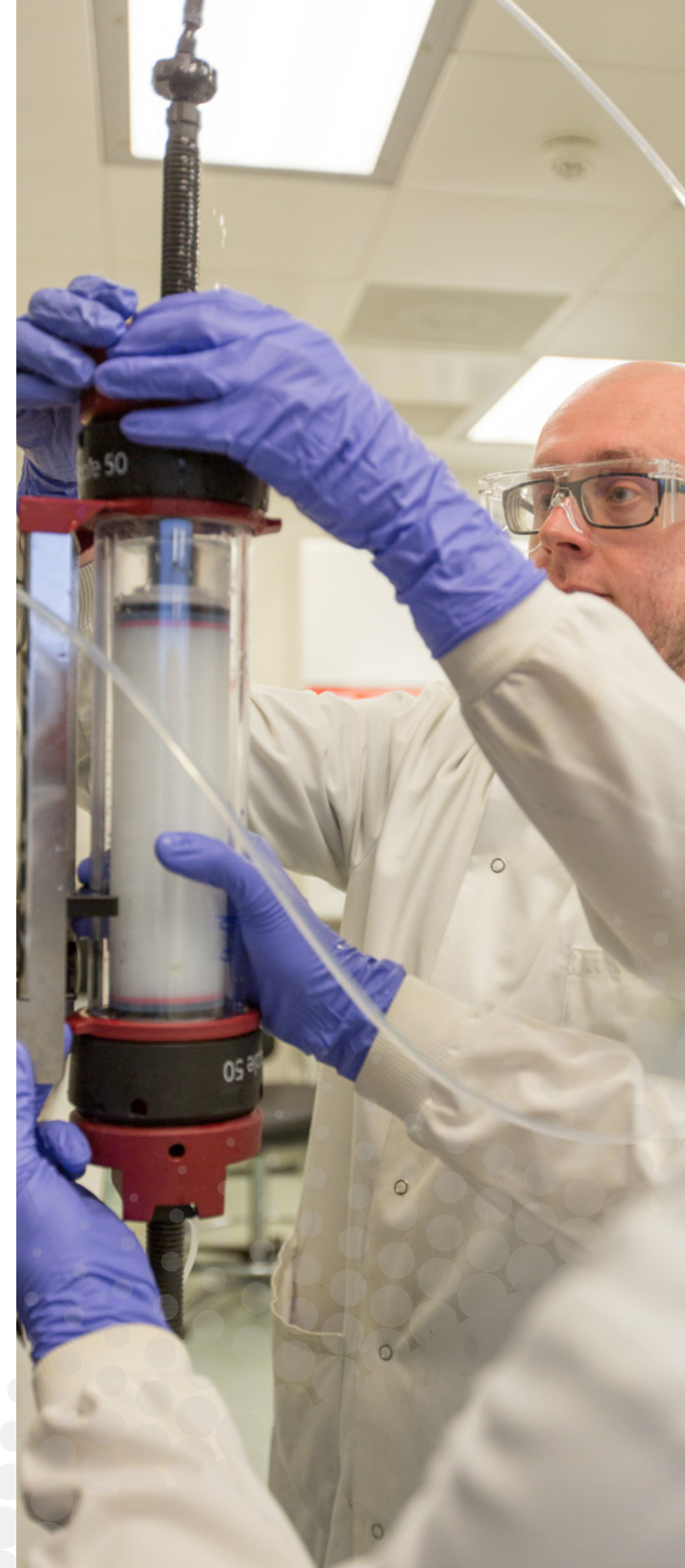
### WHAT IS... AN ADVERSE EVENT?

*Any untoward medical occurrence in a patient administered an Allergan product and which does not necessarily have to have a causal relationship with this treatment. An adverse event can therefore be any unfavorable and unintended sign (e.g., an abnormal laboratory finding), symptom or disease temporally associated with the use of an Allergan product, whether or not considered related to the Allergan product.*

*To protect patients and preserve the trust people place in our company, we are required to report any adverse events related to the use of our products.*

**Q:** I had coffee with a friend who told me she felt dizzy after using one of our products. Do I need to report this?

**A:** Yes, regardless of how you learn of it, you have a responsibility to report the adverse event within 24 hours from when you receive the information. Every effort must be made to obtain the following four criteria: **P**atient identifiers, **R**eporter details, **E**vent(s) and **P**roduct(s). Even if all four criteria are not available, forward all available information within 24 hours. Please refer to the Policy for Reporting Adverse Events and Other Safety information (GPSE-PVOPS-P-001) for additional guidelines and contact information. Allergan provides training on how and where to report adverse events to all employees.





# WE INTERACT RESPONSIBLY

We **build bridges** with every interaction by fostering customer intimacy, displaying a cooperative spirit and connecting across groups to get the job done. We always act with integrity and adhere to high standards of ethical and professional behavior. By interacting responsibly, we earn the trust of healthcare providers, business partners, each other and the community.



## COMPLIANCE WITH LAWS AND REGULATIONS

We work in a highly regulated industry. The laws under which we operate are designed to protect patients, improve the quality of products on the market and prevent fraud, abuse or improper influence. Complying with laws and regulations is critical to the success of our business and fundamental to who we are as a company.

Pharmaceutical laws and regulations are complex and vary significantly from country-to-country. You have a responsibility to know and comply with the laws, regulations and policies that apply to your work and to ask for help if you ever encounter a conflict between our policies and local requirements. Failure to comply with the law can lead to severe consequences for our company and for you.

It's important that you understand your obligations and take action if you learn of or suspect a violation of the law or our policies. If you ever have questions, seek help.

### HEALTHCARE FRAUD AND ABUSE LAWS

Many of our products are reimbursed by governments through government healthcare programs. These programs are subject to a number of laws intended to prevent fraud, waste and abuse.

Some examples include laws that:

**Make it illegal** to knowingly file fraudulent claims (“false claim”), records or statements to the government for payment.

**Require healthcare companies** to promote prescription drugs accurately and in a manner consistent with approved product labeling.

**Make it illegal** to offer or receive a bribe.

*As a pharmaceutical company, we operate in an industry subject to a number of laws and regulations. Know your obligations and seek help if you need additional guidance.*



## PRODUCT PROMOTION

Patients and physicians rely on our company to promote our products honestly and in accordance with the law. We ensure that the information we provide in our promotional materials and communications is accurate, reliable and balanced.

Promote our products responsibly:

**Focus on patient safety.** Where applicable, ensure that patient safety is included in any promotional effort or activity in which we engage.

**Represent our products fairly.** Advertise and promote our products using only approved materials and information that has been reviewed by Allergan personnel for compliance with laws and regulations.

**Be transparent.** Provide complete, fair and balanced information about the benefits and risks of our products. Make sure that any information you provide can be supported by scientific data.

**Choose integrity.** Follow applicable laws and regulations. Conduct promotional activities ethically and never offer a financial or other advantage to obtain or retain business.

**Remain consistent with locally approved labels.** Promote only truthful, non-misleading, on-label information about our products when participating in advertising activities or interacting with physicians, healthcare professionals and other customers.

*Provide reliable, accurate and complete information about our products. Colleagues who are responsible for engaging in promotional activities should only promote in ways that are truthful, non-misleading and consistent with approved product labeling.*

**Q: I am a sales representative, and one of the physicians I call on has questions about an off-label use of one of our products. Can I respond to her question?**

*A: No. As a sales representative, you are not permitted to discuss off-label product uses with physicians. You should tell the physician that the question is off-label, so you cannot discuss it, and refer her to the Global Medical Scientific Information Department directly for information about her request. The Global Medical Scientific Information Department can be contacted via email at IR-Medcom@Allergan.com. Based on her request, you can also provide her with the contact information of the Global Medical Scientific Information Department directly, refer her to the appropriate Medical Science Liaison (MSL) or follow any other regional or country-approved process for handling such requests.*

**Q: I know from personal use that one of our products can be effective in treating a medical condition, but it's not approved for that use. Can I 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. As a representative of Allergan, you may not promote products for any off-label use, regardless of whether the use is personal or not.*



**FIND OUT MORE**

*Contact your Compliance representative with any questions you have related to promoting our products.*



## BUSINESS COURTESIES

Business courtesies, such as modest meals, hospitality and nominal gifts may be permitted in limited situations and only if they are in accordance with our policies. We must ensure any business courtesies provided cannot be misinterpreted or suggest something improper by following company policy. Only offer or provide business courtesies for legitimate business purposes, and only when allowable by local law and company policy.

Below are examples where business courtesies may be permitted. Only business courtesies specifically allowed under policy can be provided.

**For educational** programs and business discussions, modest meals may be provided to healthcare professionals by appropriate, trained colleagues.

**Healthcare professionals** that are required to travel a certain distance for consulting activities may be permitted to stay at moderately priced hotels and be reimbursed for the expense.

*Strict laws apply when exchanging business courtesies with healthcare professionals and government officials, so take care to avoid even the appearance of impropriety. Always refer to your local policies and procedures for specific guidance. If you have questions on a policy or procedure, you should contact your supervisor or Compliance representative for assistance before exchanging business courtesies.*

You should not accept or offer a business courtesy if it:

- *Violates the law or our policies*
- *Doesn't feel right*
- *Is in the form of cash or a cash equivalent*
- *Is given regularly or frequently*
- *Is solicited*
- *Could be viewed as influencing a business decision*
- *Creates a conflict of interest*
- *Is lavish or expensive*

Know that what's acceptable and what's not often depends on the situation. Use good judgment and always avoid anything that could even appear to be inappropriate. If you are offered a business courtesy that you cannot accept, then politely decline it. If you're unsure, seek help from your Compliance representative.





## BUSINESS COURTESIES (continued)

**Q:** A physician told me that he's hosting a holiday party for his office and suggested we pay for it because we do a lot of business with him. I don't want to lose his business. What should I do?

**A:** Politely refuse his request and speak up about the issue since this can be viewed as an activity that would improperly influence the physician's decision-making about the company and our products. The physician's request is unethical, and fulfilling it will have serious consequences for you and our company. You should report this matter to the Global Compliance Department as soon as possible.

**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:** We respect cultural customs around the world. If you work in, or travel to, a country in which it would be considered disrespectful to turn down a gift of nominal value, you should ensure that you are aware of local policies in relation to giving and receiving gifts and comply with those at all times. If you have questions on a policy, you should contact your supervisor or Compliance representative for assistance before taking any action on the gift. Remember that lavish gifts or gifts intended to influence a business decision (or even those that appear to do so) are never appropriate and should never be accepted.



### FIND OUT MORE

*Any questions about business courtesies should be directed to your Compliance representative.*





## INTERACTIONS WITH HEALTHCARE PROFESSIONALS

We interact with healthcare professionals on a regular basis in our work and provide them with information to help them make treatment decisions. In every aspect of our relationship with healthcare professionals, we observe high standards of integrity and demonstrate our commitment to patient care.

Make sure any interaction you have:

**Serves** a legitimate business purpose.

**Doesn't interfere** with a healthcare professional's independent judgment or medical decision-making.

**Complies** with applicable law, our Code and policies.

Strict rules govern our interactions with healthcare professionals, especially with healthcare professionals employed by the government or reimbursed through government healthcare programs. We may not offer healthcare professionals or government officials an improper inducement (including any payment, kickback, bribe or rebate) for the purpose of influencing prescribing behavior, purchases, recommendations or formulary decisions. Know your obligations under these laws and ensure that you interact with integrity.

### WHO ARE... HEALTHCARE PROFESSIONALS?

*Healthcare professionals typically include physicians, physician assistants, nurses, pharmacists, medical office and hospital administrators and others involved in prescribing, dispensing, administering or purchasing Allergan products or assigning Allergan products to formularies. Healthcare professionals also include those who are in a position to influence the use of, recommend, or facilitate access to Allergan products. Refer to your local policies and procedures for the scope of healthcare professionals in your location as the legal definition may change based upon local law.*

**Q:** I am new to the company and I want to develop strong relationships with the healthcare professionals in my area that may prescribe Allergan products. Can I organize and pay for social outings with local healthcare professionals as an excuse to meet them?

**A:** No. All interactions with healthcare professionals must serve a legitimate business purpose, such as education. Follow your local policies and procedures when interacting with healthcare professionals or any other individuals in a position to make or influence product-related decisions.

*Maintain the integrity of our interactions with healthcare professionals by complying with our policies and ensuring that your interactions serve a legitimate business purpose. Our interactions should always aim to enhance excellence in the practice of medicine, support healthcare professionals' independent decision making and benefit patients through the communication of truthful and accurate information about our products.*



## TRANSPARENCY

We share a commitment to transparency in all aspects of our business, from how we record financial transactions and interact with healthcare professionals to how we document the results of clinical trials. Do your part. Never engage in any activity that would compromise our professional judgment, suggest favorable treatment or give the impression to others that we operate dishonestly in any way.

Being transparent means:

**Recording** financial data accurately, completely and in a timely manner.

**Maintaining** ethical relationships with healthcare professionals.

**Conducting** clinical trials in accordance with our policies and the law.

**Making** clinically significant research findings publicly available and providing reliable information about our products.

*Our commitment to transparency touches every part of our business. Be honest and fair when working with others and make decisions that move Allergan forward with integrity.*

**Q:** A colleague sent me a copy of our annual report and I noticed that some of the figures she used were incorrect. Because I don't work on the team that prepares the report, it's not my place to say anything, right?

**A:** No. Even though you're not responsible for working on the report, you should still speak up about the errors you found so that they can be corrected. Investors and the public rely on the information we disclose in our annual reports, so it's important that they accurately reflect our company and its financial position.







## RELATIONSHIPS WITH SUPPLIERS

The relationships we've built with our suppliers are based on a foundation of mutual trust and respect. We choose all of our business partners wisely and ensure, through diligence and monitoring, that they share our commitment to doing business with integrity. You have a responsibility to maintain ethical relationships with all suppliers.

When **identifying and selecting** suppliers:

**Only choose** suppliers who embrace high standards of integrity.

**Be diligent** and take reasonable steps to research the supplier's background by ensuring appropriate financial and debarment checks are done.

**Only choose** reputable suppliers based on due diligence conducted during the procurement process and reference local/departmental policies for additional due diligence that may be required for certain activities.

**Base your decision** on objective criteria, such as price or the quality of services they provide.

When **working with** our suppliers:

**Treat** them with respect.

**Protect** their confidential professional information.

**Monitor** them closely to ensure they abide by our policies and adhere to contractual requirements.

**Q:** Due to my position at the company, one of our suppliers offered to hire my son, a college student, as an intern. I think it would be a great opportunity for him to gain some work experience. The supplier also said he hoped it would help them retain future business with us. Can I accept the supplier's offer?

**A:** No. That would be using your position at Allergan for personal gain, which is not permitted under our policies. You should decline the offer and discuss the situation with your supervisor.

*Refuse to accept anything at all from any of our business partners, including suppliers that could influence or, even appear to influence, your ability to make objective decisions.*



## WORKING WITH THE GOVERNMENT

Our company is proud to do business with the governments of countries around the world. We strive to be a responsible partner and follow the law and regulations. Healthcare professionals can be considered government officials, and the services they provide qualify under this section. See “Who are ... Government Officials?” for additional information.

If your job involves working with the government:

**Know the rules** that apply to your job responsibilities and the country in which you work.

**Comply** with the laws governing the procurement process and applying for regulatory licenses and permits.

**Always** submit complete, timely and accurate documents.

**Restrictions always** apply when providing things of value to government officials. Always refer to your local policies and procedures for specific guidance. If you have questions on a policy or procedure, you should contact your supervisor or Compliance representative for assistance before providing things of value to government officials.

Maintain ethical relationships with our government partners and help us keep their business by conducting business openly, honestly and transparently.

Our company may be subject to government requests, audits and investigations. Audits and investigations are critical to providing assurance that we look after patient health and safety.

If you receive a request from a government official or agency:

Always:

**Contact** and consult with the Legal Department for assistance prior to responding to ensure you are following proper protocol.

**Follow** guidance provided by the Legal Department.

Never:

**Obstruct** or impede any investigation or audit.

**Make false** or misleading statements or persuade someone else to do so.

**Destroy** or alter records following or in anticipation of a government request.

### WHO ARE... GOVERNMENT OFFICIALS?

*The term “government official” includes elected officials and colleagues of government agencies, state-owned companies or public academic institutions. It also includes political parties, party officials and candidates for political office; employees of more than 75 public international organizations, such as the European Union and the United Nations; and any other person performing a public legislative, administrative or judicial function. Some healthcare professionals may also be considered “government officials.” Refer to local policies and procedures for the scope of the term “government official” in your location.*

*We never tolerate retaliation against anyone who cooperates with any government request related to an audit or investigation. Contact the Legal Department for assistance before responding to a government request.*



## WORKING WITH THE GOVERNMENT (continued)

**Q:** I just received a notice that a government agency will be coming into our office for an audit. The notice contained a list of products that will be reviewed and mentioned that members of our team will be interviewed regarding promotional activity and recent sales data for these products. What should I do?

**A:** You should contact the Legal Department for assistance in preparing for and coordinating our response to the request.

**Q:** I'm hosting an event where government officials will be in attendance and I want to provide lunch to everyone at the event. I don't want to violate our policies. What should I do?

**A:** You should seek help. The rules that apply to giving business courtesies are complex and vary depending on where you're located. If you're unsure of what to do in a given situation, you should always ask for guidance before proceeding.





## ANTI-BRIBERY AND ANTI-CORRUPTION

Bribery and corruption can harm communities, the marketplace, our patients and customers and can damage our reputation. Simply put, we do **not** offer, give or accept anything of value (or allow others to do so on our behalf) in exchange for a favorable business decision, a business advantage or as a reward to an individual for a favorable business decision or a business advantage given in the past. The penalties for violating anti-bribery laws can be severe and may include, but are not limited to, jail time and fines for individuals and the company. Know and follow our policies and always avoid anything that even appears to be improper.

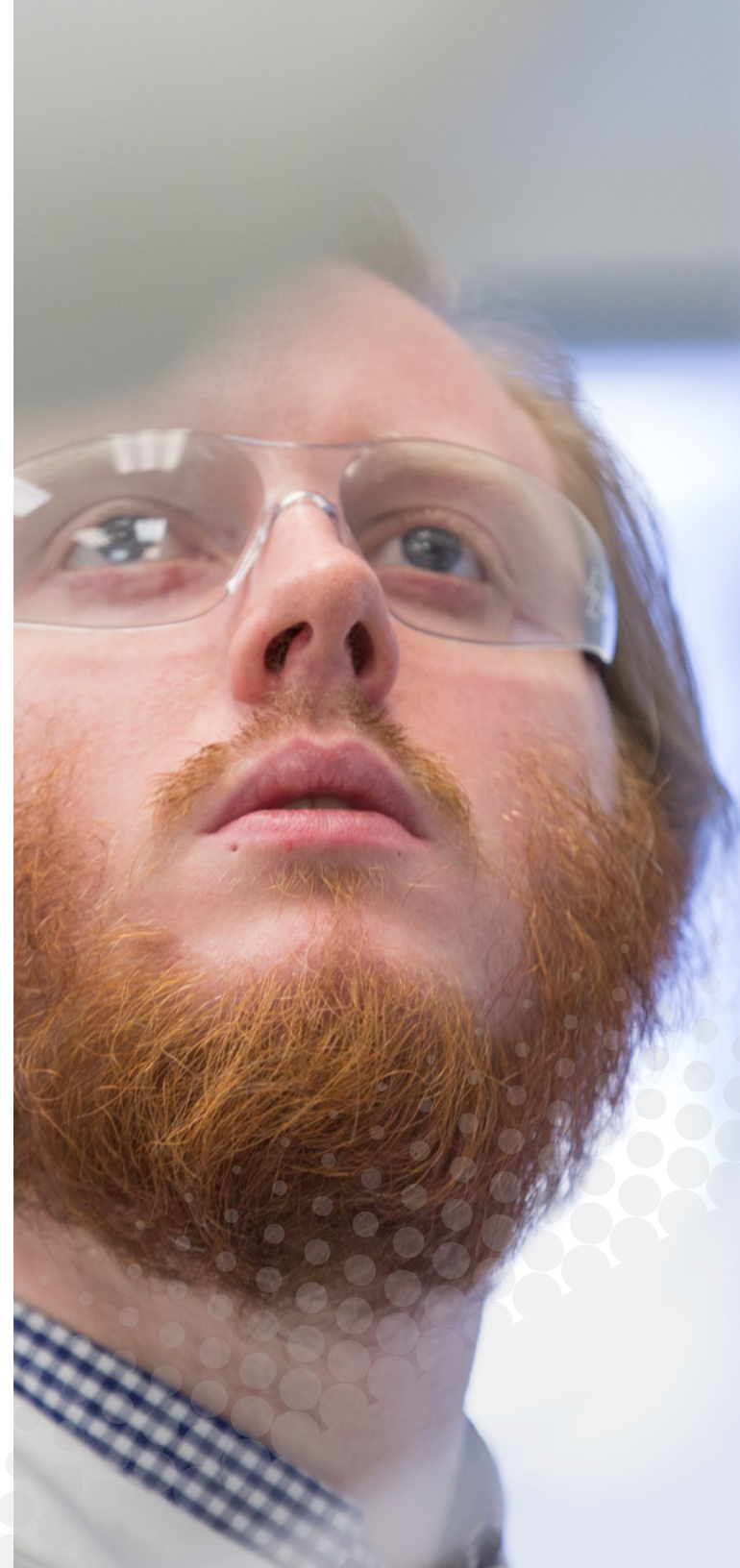
### WHAT ARE MY RESPONSIBILITIES?

**Be familiar with our policies and the law.** Anti-bribery and anti-corruption laws can differ depending on where you're located, and some laws apply to more than one country, so know the laws that apply to your work. The U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010 are significant laws that may be implicated by improper practices made throughout the world. Some other laws to be familiar with are the Brazilian anti-corruption law, China's Anti-Unfair Competition and Criminal Laws of the PRC and the Canadian Corruption of Foreign Public Officials Act (CFPOA). Whenever a law differs from our policy, remember that the most restrictive requirement applies. Allergan maintains comprehensive anti-bribery and anti-corruption policies. Refer to these documents for further detail.

**Maintain ethical relationships with third parties.** Select reputable third parties that share our commitment to doing business with integrity. When working with any third party, avoid actions that can be seen as inappropriate and never provide anything that could appear as being offered to obtain a business advantage.

**Never make facilitation payments.** "Facilitation payments" are unofficial payments made to government officials to secure the performance of, or speed up, routine government functions, such as processing visas or permits. These payments are not allowed even where permitted by local laws.

**Record transactions accurately.** Keep accurate records and comply with our recordkeeping policies and internal accounting and financial controls. Never allow anyone to record a transaction inaccurately, or in a way that hides where it came from or for what it was used. Additional information is covered in the section on Financial Integrity.





## ANTI-BRIBERY AND ANTI-CORRUPTION (continued)

### WHAT IS... A BRIBE?

*Bribes can take many forms and if offered without legal justification, could include:*

- *Job offers*
- *Discounts*
- *Cash*
- *Meals, beverages or entertainment*
- *Gifts (however small)*
- *Consignments*
- *Preferential status or contracting terms*
- *Charitable contributions*

*When selecting third parties to perform work on our behalf, 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. Allergan may be held liable for acts of bribery committed by third parties working on our behalf. Allergan provides training and policies to third parties that perform services on behalf of the company. It is also important to monitor their activities closely to ensure they represent our company with integrity.*

**Q:** I was reviewing an expense report someone on my team submitted and noticed a large payment was made to a consultant for services related to obtaining approval for a new product. The payment was not supported by any documentation and wasn't classified properly in the system. What should I do?

**A:** Any payment that is not supported by documentation and classified properly should be questioned. You should ask the person who prepared the report to provide you with documentation to support the payment in order to avoid the appearance of an improper inducement. If they do not respond, refuse to provide you with the documentation or provide insufficient or questionable documentation, you should notify your supervisor or the Allergan Integrity Action Line immediately so that the matter can be properly investigated. It is also important to ensure payments are recorded accurately so the company can adhere to its reporting obligations.

**Q:** I was asked to work on a market research project that needs to be completed by the end of the week. I have to select a third party vendor to help facilitate research with healthcare professionals. In order to get a head start, I thought it would be a good idea to pick the first vendor I read about on the Internet without performing proper due diligence so there's more time to work on the project. Is this appropriate?

**A:** Before engaging with the third party, you must perform appropriate due diligence according to the guidelines that are covered in the section on Relationships with Suppliers to ensure they share our commitment to doing business with integrity. You should not engage third parties who do not satisfy the company's due diligence procedures. If you feel that appropriate due diligence can't be performed, seek advice from your supervisor or Compliance representative. Before the third party performs services, you should also ensure they receive applicable policies and procedures and complete appropriate training.



## FAIR COMPETITION

We want to win business and maintain patients' trust based on the quality and merit of our products — not because of unfair business practices. We support a free and open market, which is why we comply with competition laws everywhere we do business and strive to always compete fairly.

Competition laws are complex and often difficult to navigate. Know the laws that apply to your work and seek help if you need guidance in a particular situation. In general, you should avoid discussions about competitively sensitive matters and agreements that limit competition or violate the law.

You must never discuss or agree with competitors to:

**Fix prices** or terms of sale

**Divide markets**, customers or territories

**Prevent** competitors from entering the market

**Refuse** to deal with a particular customer or supplier

In addition, the company should avoid “tying arrangements.”

Trade association and industry gatherings pose special risks because they bring together competitors, increasing the risk of a discussion about competitively sensitive matters. Use good judgment at these gatherings to avoid discussions that could violate anti-competition laws.

Our commitment to competing fairly also applies to how we gather information about our competitors. We obtain this information ethically and use public sources whenever possible. If public sources can't be used, third-party vendors that have been selected and contracted according to company policies can be utilized to gather business information. Never steal proprietary information, gather information in unethical ways or ask someone to do so on our behalf. Use good judgment and if you receive information that you believe was collected unethically or illegally, speak up.

### WHAT IS... A “TYING ARRANGEMENT”?

*Tying arrangements are agreements where a seller conditions the sale of one product (the “tying” product) on a customer's agreement to purchase a different (“tied”) product or a customer's agreement not to purchase the “tied” product from any other seller.*

*Even the appearance of engaging in anti-competitive business practices can violate anti-competition laws. If a competitor starts discussing anti-competitive matters, end the discussion, remove yourself from the situation immediately and report the incident to the Global Compliance Department, Legal Department or the Allergan Integrity Action Line.*



## FAIR COMPETITION (continued)

**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 any of our company's information?

**A:** *No. It is never acceptable to discuss pricing, terms or any similar confidential information, with a competitor – regardless of whether you share our information. You should tell your neighbor that you can't discuss competitively sensitive information. If she continues to share this type of information with you, you should end the discussion and remove yourself from the situation. You should also report the situation to the Global Compliance Department, Legal Department or the Allergan Integrity Action Line.*

**Q:** I noticed a folder accidentally fall out of a briefcase belonging to one of our competitors' sales representatives. The folder is labeled with the name of their newly launched product. Any information I can learn about the product would be helpful to my sales team. Since she dropped it, can I pick it up and look at it?

**A:** *No. We never resort to unethical means to obtain information about our competitors. You should let the competitors' sales representative know that she dropped the folder and return it to her without reading its contents.*



### FIND OUT MORE

*If you have questions relating to your responsibility to compete fairly, contact the Legal Department.*





## TRADE COMPLIANCE

As a company that exports and imports products and information to countries around the world, we are subject to a number of laws that regulate how and with whom we can do business. We comply with the trade laws that apply to our business and understand that our ability to export our products is a privilege, not a right.

If your job involves the movement of our products or information across borders, know the trade laws that apply to your work. Be aware that the laws of more than one country can govern a particular transaction. Know and comply with applicable boycott laws and trade sanctions.

Understand that the consequences for violating these laws can impact our operations significantly and could even result in the loss of our export and import privileges.

If your job involves international trade:

**Follow** the laws of the countries where you do business.

**Document** international transactions completely and accurately.

**Obtain** required licenses before exporting or re-exporting our products.

**Never** become involved in transactions that involve weapons proliferation.

**Contact** the Global Trade Compliance Department if you have any questions.

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

*A: We have to ensure that the information included in trade documentation is complete and accurate, to the best of our knowledge. If you know that the final destination of the goods being shipped is different from what is reflected in the documentation, update the documentation and work with the Global Trade Compliance Department to have this done.*

**Q:** I recently shipped goods internationally and now realize that the documentation listed the value of the goods as lower than their actual value. What should I do?

*A: You should let your supervisor and the Global Trade Compliance Department know so that they can correct the error. Incorrectly listing the value of goods that are shipped impacts the amount of the taxes applied to the trade transaction, so it's important that the documentation is corrected as soon as possible so that proper taxes can be paid.*

*Always confirm the final destination of any product we export and make sure that the intended recipient is not a prohibited country or person under trade compliance laws.*



**FIND OUT MORE**

*Questions about trade compliance laws or our policies should be directed to the Global Trade Compliance Department.*





## MONEY LAUNDERING

Money laundering is a process where criminals move funds gained through illegal activity (such as fraud, terrorism, drug dealing and corruption) through legitimate businesses to hide their criminal origin. Preventing money laundering takes vigilance.

Do your part:

**Comply** with the law, regulations and our policies.

**Know** who's behind every transaction.

**Do** business only with reputable third parties involved in legitimate business activities.

**Understand** how customers use our products and services.

**Report** suspicious activity.

### WHAT DOES... MONEY LAUNDERING LOOK LIKE?

*Examples of questionable transactions may include:*

- *Attempts to pay in cash.*
- *Requests to ship to a country other than where the payment originated.*
- *Attempts to avoid recordkeeping requirements.*
- *Payments made by individuals who are not parties to the transaction.*
- *Suspicious changes in the pattern of a customer's transactions.*

**Q:** A new customer placed a large order, but insisted on paying in cash, which seemed odd to me especially given the size of the order. What should I do?

**A:** Report it right away. Suspicious transactions, such as attempts to pay in cash, could be attempts to launder money. If you're ever unsure about any transaction, seek guidance before moving forward.

*Be alert and report suspicious activity to your supervisor, the Allergan Integrity Action Line or through another one of our reporting channels.*



# WE PROTECT OUR COMPANY

Our relationships, assets and brand are what allow us to **drive results**. In order to be successful we must take initiative, strive to be the best and make a difference every day. If we do all of these things well, we will drive results for patients, customers and our company.



## CONFLICTS OF INTEREST

We trust you to make objective decisions on behalf of our company and to avoid situations that can create — or appear to create — a conflict of interest. While it's not possible to list every circumstance that presents a conflict, there are some instances where they can arise:

**Business opportunities** — competing with our company in acquiring or selling an asset or otherwise interfering with our business affairs for personal gain.

**Investments** — having a significant financial interest in a company that competes or does business with Allergan.

**Gifts** — receiving frequent or routine personal benefits, such as gifts or entertainment, because of your position at Allergan.

**Secondary employment** — participating in outside employment with a company that competes or does business with Allergan

**Outside activities** — serving on a board or committee of any organization, including a non-profit, whose interests conflict with those of our company.

**Personal relationships** — supervising a family member or allowing a personal relationship you have with someone to affect your judgment at work.

If a conflict of interest arises, disclose it to your supervisor, Human Resources or Compliance representative as soon as possible. Conflicts of interest can often be easily remedied or managed if they are reported promptly.

### WHAT IS... A CONFLICT OF INTEREST?

*A conflict of interest occurs when your personal interests interfere, or give the appearance of interfering, with the interests of our company or if you use your position at Allergan for personal gain.*

*Always remove yourself from any decision that could even appear to present a conflict between your personal interests and the interests of our company.*

**Q:** My brother works for a potential vendor Allergan is considering contracting with to provide computer services. I work in an unrelated department and am not involved in the decision. Do I still need to report this?

**A:** While this situation would not likely be considered a conflict, it would still be wise to report it to your supervisor, Human Resources or Compliance representative so that the company is aware of it.



### FIND OUT MORE

*Contact your supervisor, Human Resources or Compliance representative to disclose potential conflicts of interest or with questions.*



## CONFIDENTIAL BUSINESS INFORMATION

Our intellectual property, trade secrets, proprietary information and other confidential business information provide our company with a competitive advantage and could cause harm if made public without our permission and without following proper protocols. We all have a responsibility to handle business information with care and protect it from unauthorized use and disclosure.

When handling confidential business information:

**Never** leave it where others can view or access it.

**Use it** only for legitimate business purposes.

**Store it** only on approved devices that are secured. Encryption should be used where applicable.

**Don't** discuss it where you can be overheard.

If you're authorized to disclose confidential business information:

**Make sure** you have a business reason to share it.

**Disclose** it only to someone with whom we have a confidential disclosure agreement.

**Provide** only the information that's needed.

**Ensure** that the recipient understands the restrictions related to its use and/or dissemination.

Intellectual property includes our brand, ideas and company knowledge. Everyone has a responsibility to protect our intellectual property, use it solely for business purposes, and disclose it only with company approval. Our responsibilities also include respecting the intellectual property rights of others. We take care not to infringe on patents, trademarks and other such rights held by any third party.

Know that your responsibility to maintain the confidentiality of our business information does not end when you leave Allergan. You must refrain from sharing confidential business information with any current, future or former employer.





## CONFIDENTIAL BUSINESS INFORMATION (continued)

### WHAT IS... CONFIDENTIAL BUSINESS INFORMATION?

*Confidential business information is any information not available to the public that gives us a competitive advantage. Examples include:*

- *Company financial data*
- *Sales and marketing plans*
- *Business strategies*
- *Scientific and clinical data*
- *Trade secrets*

### WHAT IS... A WORK FOR HIRE?

*In some countries, such as the U.S., the ideas, discoveries, developments, inventions and processes a person develops in the course of his or her work are considered company property and belong to Allergan as intellectual property.*

**Q:** I found a product logo or other intellectual property of another company online and want to use it in some of our marketing materials. The design is catchy and I think it would draw attention to these materials. Since it's available online, I don't need permission to use it, right?

**A:** Not necessarily. Using the design (especially for commercial purposes) could infringe on the intellectual property rights of another person or entity. Before using someone else's intellectual property, you should always contact the Legal Department to determine if, and under what circumstances, you can use such intellectual property, and what steps if any, need to be taken in order to do so.

*You also have a responsibility to protect any confidential business information that you learn from third parties (such as vendors and suppliers) through your work at Allergan.*



**FIND OUT MORE**

*Any questions about confidential business information should be directed to the Legal Department.*



## DATA PRIVACY AND PROTECTION

When people provide their personal information to Allergan, they trust our company to collect and process their personal information consistently with their notice and consent and to use our best efforts to securely protect, transfer and store it. We count on you to help us preserve that trust by handling the personal information of patients, customers, business partners and colleagues in accordance with their permissions, applicable data protection laws and regulations and our privacy policies and procedures.

### WHAT IS... PERSONALLY IDENTIFIABLE INFORMATION?

*Personally identifiable information (“PII” or “personal information”) is any information that can identify, or can be used to identify, a person. PII includes, but is not limited to, a person’s name, phone number, email address, other contact information and credit card data.*

*Due to the nature of our business, you may also have access to sensitive PII, including the personal health information of individuals. This can include a patient ID number, even if that ID number does not directly identify the patient, so long as someone could use that ID number to identify the patient.*

*This type of PII is subject to increased scrutiny and control according to global privacy and data protection laws, such as the Health Insurance Portability and Accountability Act (HIPAA) in the U.S., and the Data Protection Directive and the General Data Protection Regulation in the EU. Violations of these laws can have serious consequences, including significant financial penalties, criminal prosecution of colleagues and the company, and the interruption of critical business activities. This is why it is extremely important for each and every colleague to know and comply with all the privacy laws and Allergan policies and procedures that apply to your work.*

*You may only access PII and sensitive PII for appropriate business purposes.*

*Improper disclosure of personal information can cause harm not only to the person to whom the information pertains, but also our company and its reputation. If you think that the privacy or data security of personal information has been compromised, report it immediately to the Global Privacy Office at [IR-Privacy@allergan.com](mailto:IR-Privacy@allergan.com).*

**Q:** I accidentally sent an email containing personal information about some of our patients to the wrong person — someone outside of our company who isn’t authorized to have the information. What should I do?

**A:** You should report the issue right away so that we can respond appropriately. Sending sensitive information to someone not authorized to have it could cause harm to the individuals whose information was contained in the email and our company’s reputation.



## INSIDE INFORMATION

### WHAT IS... INSIDER TRADING?

*Insider trading is the illegal practice of using or sharing material, nonpublic company information to one's own advantage when deciding whether to buy, sell or hold securities of that company.*

*Examples of information that might be material – if not yet made public – include:*

- *Current earnings prior to public disclosure*
- *Projected earnings or losses*
- *A proposed merger, acquisition or sale, or a material licensing arrangement*
- *A significant increase in or cutback of operations*
- *New data (including approved clinical data) regarding product safety or efficacy*
- *The development, approval or launch of a new product*
- *The gain or loss of a significant customer*
- *A change in company leadership or restructuring plans*

*Violations of insider trading laws can result in serious consequences to you, up to and including termination of employment and civil fines and penalties, and criminal prosecution.*

### GENERAL POLICY

While working at Allergan, you may come into contact with material, nonpublic (“inside”) information about our company, or about companies with which we do business or may be in business discussions with. Any decision to buy, sell or hold securities, whether Allergan securities or those of other companies, (for example, stocks, bonds or options) while in possession of inside information is against the law.

If you have inside information, you are not permitted to trade on the information, or pass it along to others who may trade on it (a practice called “tipping”), before it is made publicly available (for example, through a public filing, a press release or published on our public website) to ordinary investors. If you’re ever in doubt about whether certain information is material or has been released to the public, don’t trade until you have consulted with the Legal Department.

The rules about inside information apply:

**To you**, your spouse and your family members

**To information** about our customers, suppliers or other business partners, including potential business partners

**No matter** where you live

### TRADING WINDOW

In addition to the General Policy prohibiting insider trading, Allergan has established a “trading window” during which certain “restricted persons” (all officers and directors, and certain employees in sensitive positions) may or may not trade Allergan stock. When the trading window is closed, restricted persons are prohibited from trading. When the trading window is open, restricted persons may trade as long as they comply with Allergan’s general policy against trading Allergan stock when in possession of material, nonpublic information. Whenever a trading window is closed or opened, a communication goes out to the restricted persons.

#### Q: When is information considered “public”?

*A: When it has been released to the public (through a press release, for example), if it has been filed with the SEC, or if it appears on our public website or on Allergan social media channels. Items on our employee intranet site are generally **not** considered public. If you have any doubt as to whether any information is considered “public,” it’s always best to check with the Legal Department before proceeding.*



## INSIDE INFORMATION (continued)

**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:** No. 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.



### FIND OUT MORE

Discuss any questions or concerns about insider trading with the Legal Department.

## FINANCIAL INTEGRITY

As a publicly traded company, we have a duty to maintain books and records that reflect our financial position and our business accurately. The integrity of our books and records is essential to our continued success, which is why we all have a responsibility to ensure our business records are timely, honest, accurate and complete.

Business records include:

- *Timesheets*
- *Expense reports*
- *Invoices*
- *Payroll records*
- *Notes and drafts of documents*
- *Emails and other electronic communications*
- *Information stored on shared drives or hard drives*

You have a responsibility to:

**Record** transactions honestly.

**Protect** our records from unauthorized alteration.

**Watch** for signs of illegal activity or fraud.

**Follow** our internal processes, controls and accounting standards.

**Cooperate** with any internal audits and investigations.

*False and misleading statements could be a sign of fraud, bribery or other illegal activity. Don't ignore suspicious behavior — speak up.*

**Q:** I received several large invoices for work that was recently performed — two weeks before the end of the year. Can I hold off on processing the invoices until after the new year so that the charges won't hit this year's budget?

**A:** No. Expenses have to be reported in the period they are incurred. Delaying recording expenses until the new year would make our company's operating costs for the current year appear to be lower than they actually are, which could mislead investors about our company's performance.





## RECORDS MANAGEMENT

We're committed to managing our records responsibly and ensuring we retain the records needed to support our tax, legal, compliance and financial obligations. Maintain our records in accordance with our policies and seek help if you have any questions or concerns.

Handle our records with care:

**Retain** records for the length of time required by our policies and applicable law.

**Securely** dispose of documents that are no longer needed.

**Be mindful** when creating new documents and ensure that any record we create is accurate and professional.

**Never** dispose of a document subject to a legal hold.

### WHAT IS... A LEGAL HOLD?

*It's a notice to suspend the destruction of a record that's relevant to a legal action or investigation. Contact the Legal Department if you receive a legal hold notice or have questions about any documentation that is subject to a legal hold.*

*Be sure to protect any records that contain confidential information and retain them according to our policies.*

**Q:** A colleague keeps disposing recently executed contracts between the company and suppliers. I know she started with the company a few weeks ago, but I am concerned that she isn't retaining the contracts long enough as required by our policies. Should I say anything?

**A:** Yes. You should remind your colleague that any records should be kept for the appropriate time periods as outlined in our policies. If you don't feel comfortable speaking with your colleague about the issue, you can talk about it with your supervisor or contact the Allergan Integrity Action Line.



**FIND OUT MORE**

*Please reference the Global Records Retention Policy and/or local record retention policies for additional information.*



## COMPANY ASSETS

Our assets are what enable us to do our work efficiently and effectively. All of us have a responsibility to safeguard our company’s resources and use them responsibly and for business purposes.

Our assets include things like:

- *Computer hardware and software*
- *Company property*
- *Financial resources*
- *Office supplies*
- *Information security*

**Protect our assets.** Handle all of our resources with care and take measures to prevent them from being lost, stolen or damaged. Let us know if any of our assets are defective, damaged or in need of repair. Watch for and report suspicious or fraudulent activity.

**Use our resources responsibly.** We depend on you to use our physical assets and electronic systems in accordance with our policies. While occasional personal use of things like email, phones or the Internet are allowed, always use good judgment and seek help if you’re unsure. Never use our assets in a way that’s disruptive, inappropriate, harassing or disrespectful to other colleagues. Know that anything that is created, downloaded or shared using our systems is company property and may be reviewed or monitored by Allergan at any time, unless prohibited or limited by law.

## INFORMATION SECURITY

We view information as a vital company asset that must be protected. It is important to Allergan’s reputation, along with our operational and financial assurance, that there are mechanisms to ensure information is maintained with confidentiality and integrity. Please reference the Information Security Policy and Acceptable Use Policy for more information.

**Q:** Lately, I’ve noticed that a colleague has been taking flash drives home from vacant office spaces. When I confronted her about it, she told me to “lighten up.” What should I do?

**A:** Let your supervisor or someone else know. Taking our computer equipment and other acts of theft violate our Code and our policies.



## FIND OUT MORE

*Please reach out to the Information Security Office at [ISOPolicies@Allergan.com](mailto:ISOPolicies@Allergan.com) to ask questions or visit our [ISO Policies site](#) for more information.*

*We rely on you to help us protect the tools and information that drive our business. Treat our assets as you would your own and use them in accordance with our policies.*



# WE ARE RESPONSIBLE CITIZENS

Allergan is focused on **helping people everywhere live better lives**. We are active in our communities, purposeful in our engagement and dedicated to making a difference.



## SPEAKING ON BEHALF OF ALLERGAN

Everything we say on behalf of Allergan affects our reputation and our brand. We want to make sure that we deliver a consistent message, provide accurate information about our company and protect confidential information, which is why only certain people are authorized to speak on Allergan's behalf. Communicate responsibly and forward inquiries to the appropriate company resource.

### REFERRING QUESTIONS OR REQUESTS FOR INFORMATION ...

We want to ensure that government agencies, the media and the general public have accurate information about our company.

IF YOU RECEIVE A REQUEST FOR INFORMATION	
FOR:	CONTACT:
Investor questions about financial reports or requests for company standards	<b>Finance – Investor Relations</b>
Media inquiries or requests for company statements	<b>Corporate Affairs Department – Media Relations</b>
Government or regulatory agency information requests	<b>Legal, Regulatory Affairs or the Government Affairs Department</b>





## SPEAKING ON BEHALF OF ALLERGAN

(continued)

### USING SOCIAL MEDIA RESPONSIBLY ...

Social media offers a great way to exchange ideas or make connections. While we support the personal use of social media, you should always use it responsibly and in accordance with our policies and procedures when discussing Allergan-related topics.

When communicating on social media:

**Never** disclose confidential business information.

**Make sure** it's clear that your views are your own and not those of our company.

**Follow** our policies, even when using your personal social media account to talk about Allergan business activities. Personal accounts should not be used to talk about Allergan's business activities unless specific authorization has been given by the company to do so, or if the communication is protected under applicable law.

**Know** that you are responsible for what you publish.

Allergan supports the rights of employees to speak publicly about matters of public concern and engage in concerted activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended to interfere or limit that right.

**Q: I received a call from a reporter asking about a new product we released. Can I tell the reporter what I know?**

*A: No. Unless you are authorized to speak on our behalf regarding company business, you should not answer any external questions about Allergan. You should tell the reporter that you are not authorized to speak on behalf of the company and then forward the reporter to the Corporate Affairs Department — Media Relations.*

*If you are authorized to speak on our behalf, do so with integrity and in compliance with our policies.*

**Q: What if I have a social media profile that shows that I work for Allergan and a friend posts a question on my page about an off-label use of one of our products. I saw some research that suggested that it could help his condition. Should I respond to his question?**

*A: Because your profile shows that you work for Allergan, it could appear as if our company is promoting an off-label use of one of our products if you respond, which could have consequences for you and our company. You should avoid posting a response to his question suggesting an off-label use of any of our products. Instead, you should respond stating that the question is off-label and refer him to the Global Medical Scientific Information Department for information on his request.*



## POLITICAL AFFAIRS AND PUBLIC POLICY

We believe that getting involved in the political process is part of being a good citizen. Though we respect and encourage your participation in political activities, make sure you follow the law and our policies.

When engaging in political activities:

**Do** so on your own time.

**Never** use our resources to further your personal political views or activities.

**Never** use our resources to solicit financial or other support for political candidates or causes without approval from the Government Affairs Department.

**Avoid** speaking on behalf of our company.

**Seek help** if you have questions or concerns.

As a company, our political activities are focused on supporting the development of laws and regulations to ensure patients have access to innovative products that help them achieve a better quality of life. We also provide government officials with educational materials on health conditions, issues and research to assist them in making informed decisions.

If you are involved in our public policy efforts or otherwise interact with the government:

**Comply** with applicable law, our policies and procedures.

**Always** act ethically.

**Ensure** that patient needs are the focus of any activity in which you engage.

**For U.S. activities**, get approval from the Government Affairs Department before engaging with the government on behalf of the company in order to directly or indirectly influence any legislative or executive branch action.

Remember that any use of company resources for a political purpose, including any contribution to a candidate, political committee, political party or other organization that engages in politically related activity, must be approved by the Government Affairs Department. Also, any use of an Allergan facility for a political purpose must be approved by the Legal Department.

The laws and rules that pertain to interactions with the government, including those regulating campaign finance, ethics and lobbying, vary between jurisdictions and are often fact-dependent. When your circumstances are not addressed by our policies, you should contact the Government Affairs Department for review in advance of your proposed activity.





## POLITICAL AFFAIRS AND PUBLIC POLICY (continued)

**Q:** Can I collaborate with competitors to aid in the development of public policy that supports biomedical research?

**A:** Yes. Working with competitors to support public policy that will ultimately help patients is acceptable, as long as it's done ethically, in compliance with applicable law, including, but not limited to, antitrust laws, and in accordance with our policies, including those governing confidentiality of proprietary information, lobbying and memberships in industry associations. Any proposed collaboration with competitors or others must be approved in advance by the Legal Department.

**Q:** Am I allowed to send my colleagues emails from my Allergan email with information about a political cause I support?

**A:** No. Our resources, such as our email system, should not be used to support your personal political activities. While you may discuss political matters with interested colleagues, you may not send emails using our system or send emails from your personal email to your colleagues' work email regarding political matters.

*Allergan only provides support for a political cause, candidate, party or campaign if doing so is lawful and an accepted practice in the country where the support is provided. Contact the Government Affairs Department for approval before providing any type of support.*





## CHARITABLE CONTRIBUTIONS AND GRANTS

Our company is committed to making a positive difference by actively supporting initiatives that improve the health and quality of life of people in the communities we serve. We also encourage our colleagues to give back to their communities.

If you decide to volunteer or donate to a charitable cause or organization, be sure to avoid conflicts of interest and never use company resources unless you have permission to do so from the Strategic Alliance Advocacy department. The Strategic Alliance Advocacy department can be contacted at [AllianceAdvocacy@allergan.com](mailto:AllianceAdvocacy@allergan.com).

*We're committed to engaging in charitable activities ethically and we never provide charitable contributions, grants, financial support or product donations in an effort to influence a healthcare professional to prescribe or purchase our products or reward an individual for doing so in the past.*

As a company, we are committed to giving back to the community:

**Foundation-sponsored initiatives.** The Allergan Foundation and The Allergan International Foundation provide grants and charitable contributions to non-profits around the world. These foundations focus on providing support for the following areas:

*Health and human services*

*The arts*

*Civic programs*

*Education*

**Local initiatives.** In addition to the work of the foundations, we work to better patient care through supporting educational activities to increase healthcare professionals' and patients' understanding of scientific, clinical or healthcare issues. We also provide free products to impoverished communities through charitable organizations, contracted third parties and healthcare professional missionary programs.

**Medical Missions.** Healthcare professionals who would like to provide Allergan products as part of a missionary program may email information about the quantity of products requested and the logistics of the medical mission to [IR-Missions\\_Donations@Allergan.com](mailto:IR-Missions_Donations@Allergan.com).

**Q: I'm volunteering for a non-profit and we need to print some materials for an upcoming fundraiser. Can I use a work printer to print out the materials?**

**A: No. You may not use company resources, like our printers, to support a charitable activity. If you have any questions, contact the Strategic Alliance Advocacy Department.**



### FIND OUT MORE

*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).*





## ENVIRONMENTAL, HEALTH AND SAFETY

We work to provide a safe workplace for our colleagues and reduce our carbon footprint. Allergan has established environmental, health and safety standards at all of our locations worldwide to ensure that we comply with laws and reduce the environmental impact of our operations.

### ENVIRONMENTAL PROTECTION

As part of our environmental health and safety program, we take measures to preserve natural resources and develop our products in a way that minimizes our environmental impact and encourages recycling. Honor our commitment by following our policies, working with third parties that share our values and looking for ways to improve our processes. Know and follow environmental laws and ensure that any reports to government officials about environmental matters are complete, accurate and timely.

### HEALTH AND SAFETY

Maintaining a safe and healthy workplace is a team effort – requiring all of us to follow laws and our environmental health and safety standards. Do your part by speaking up about unsafe conditions and by working to promote an injury- and illness-free workplace. The Good Observation program (see your site EHS manager for details) is another avenue for reporting observed unsafe conditions or behaviors or simply making a suggestion for improvement.

We count on you to:

**Disclose health risks.** Let your supervisor know if you have a health condition that affects your ability to perform your job. If you work with hazardous materials or in high hazard areas, you are also encouraged to disclose health conditions that could be affected by that work.

**Dispose of hazardous materials responsibly.** Ensure that all waste products, hazardous materials and other similar substances are stored, handled and disposed of in accordance with applicable laws and regulations. Any instances of unsafe handling of these substances should be reported immediately to your local EHS manager or supervisor.

**Use protective equipment and apparel.** You have a responsibility to comply with the laws and safety standards that apply to your work. This includes using the protective equipment and apparel as required by our policies.

**Keep our workplace drug- and alcohol- free.** Working under the influence of drugs and alcohol can pose a safety hazard and affect your reliability and judgment, which is why we do not tolerate anyone working under the influence of these substances. Medicine prescribed to you by a doctor can also affect your ability to do your job safely. If you are using medication that may impair your ability to perform your job responsibilities, discuss it with your supervisor.

**Q: My supervisor asked me to implement a process that will save time but could pose a workplace safety risk. What should I do?**

*A: If you do not feel comfortable discussing it with your supervisor, or if you feel that you have not been taken seriously, you should report the issue to another supervisor or through one of our reporting channels. We never compromise the safety of our colleagues or anyone else in an effort to save time or meet a deadline.*



**FIND OUT MORE**

*Information about our commitment to protecting the environment and ensuring workplace health and safety can be found at [http://www.allergan.com/responsibility/environmental\\_health\\_and\\_safety.htm](http://www.allergan.com/responsibility/environmental_health_and_safety.htm).*

*Be proactive to conserve natural resources and ensure workplace health and safety.*



## HUMAN RIGHTS

We work to be good corporate citizens wherever we operate. That means we support the principles contained in the Universal Declaration of Human Rights and are committed to respecting human rights at every level of our supply chain.

We produce a slavery and human trafficking statement each financial year, which outlines the steps we take to promote human rights and transparency in our supply chains. We are also committed to the responsible sourcing of our products. We comply with laws that require disclosure of their use, and we encourage our suppliers to adopt similar policies and systems.

Respect human rights by practicing due diligence and never knowingly do business with any company or individual that violates employment laws or participates in human rights abuses, including:

- *Child labor*
- *Forced labor*
- *Human trafficking*
- *Physical punishment*
- *Unlawful discrimination*

If you suspect a business partner or other third party doing business with our company is engaged in any activity that goes against our values, policies, or the law, report it to your supervisor, the Allergan Integrity Action Line or through another one of our reporting channels.

**Q:** I heard that a third party we are considering partnering with has a reputation for engaging in questionable labor practices, but I'm not involved in the selection process. Should I say anything?

**A:** Yes. *Whenever you learn about an activity that goes against our policies, values or could reflect negatively on our company, you should speak up. Let your colleagues who are involved in the decision know what you learned.*

*Monitor our relationships with third parties closely to ensure they comply with the laws, our policies and uphold our commitment to treating everyone with dignity and respect.*



# WE TAKE CARE OF EACH OTHER

We **Act Fast** and respond to change with agility and work to eliminate bureaucracy. We do all of this while doing what is right for each other. It's our responsibility to create and maintain a positive, safe and productive workplace.



## EQUAL EMPLOYMENT OPPORTUNITY

We are proud to have a diverse global workforce with colleagues who possess a variety of talents, backgrounds and perspectives. The diversity of our team is a tremendous asset to our company. That's why we treat everyone fairly in every employment decision and are committed to ensuring everyone is provided an equal opportunity to succeed.

Employment decisions include:

- *Hiring*
- *Recruitment*
- *Promotions*
- *Discipline*
- *Performance evaluations*

When making employment decisions, base them only on the merit and qualifications of a colleague and never on factors like race, creed, color, religion, sex, national origin, ancestry, age, marital status, veteran status, disability, medical condition, sexual orientation, genetic information, pregnancy, gender identity or expression or other characteristic protected by law. Celebrate the unique talents of everyone on your team and work to foster an inclusive business environment.

**Q: Ever since I announced my pregnancy, I noticed that my supervisor has been giving me fewer assignments and has been treating me differently. What should I do?**

*A: You have a right to be treated fairly at work. If you do not feel comfortable discussing it with your supervisor, or you feel that you have not been taken seriously, you should talk to another supervisor or speak up about the issue.*

*We comply with the equal opportunity requirements of everywhere we do business and maintain an inclusive and fair workplace.*





## ANTI-HARASSMENT AND ANTI-DISCRIMINATION

Everyone deserves to be treated with respect. We work to maintain a positive working environment that's free from harassment, intimidation and discrimination. Help maintain a respectful, harassment-free workplace by recognizing abusive conduct and taking action if you see or suspect offensive, harassing or discriminatory behavior.

Harassment can be ...

**Verbal** — such as demeaning or derogatory jokes, slurs, threats or name-calling.

**Physical** — such as unwelcome touching, sexual advances, pushing or shoving.

**Visual** — such as offensive cartoons, emails, drawings or pictures as well as rude and threatening stares and gestures.

If you see or suspect discrimination or harassment, don't ignore it — speak up. We never tolerate retaliation against anyone who raises a concern in good faith.

*Treat everyone with respect and never tolerate any actions that create an offensive, intimidating or hostile work environment.*

**Q:** One of my colleagues keeps telling sexist jokes. No one else seems to mind 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 never acceptable. If you feel comfortable raising the issue with your colleague, you should let her know that you find the jokes offensive. If you do not feel comfortable discussing it with her, or if she continues making the jokes, you should let your supervisor know or report the situation.*





## WORKPLACE VIOLENCE

We're committed to providing a secure workplace where colleagues can concentrate fully on their jobs. Workplace violence is any conduct that is offensive or intimidating that causes colleagues to fear personal safety or the safety of family, friends and/or property.

Examples of conduct that might be considered workplace violence include:

**Credible** threats or acts of physical harm directed towards colleagues or his or her family, friends, coworkers or property

**The intentional destruction** or threat of destruction of Allergan property or another colleague's property

**Harassing** or threatening phone calls, texts, emails, or social media posts

**Surveillance** or stalking

We depend on you to watch for and report any threatening or intimidating behavior and to resolve any conflicts calmly. Remember that weapons are not permitted on our premises. If you see anyone with a weapon on company property, let us know immediately.

**Q: I overheard a colleague threaten another employee. Should I say something?**

*A: Yes. We do not tolerate threatening or intimidating behavior. You should report what you heard to your supervisor or speak up about the situation immediately.*

*At Allergan, we never tolerate bullying, intimidation or threats to harm anyone or their property.*





## HELPFUL RESOURCES

If you need help locating the appropriate resource, feel free to call the Allergan Integrity Action Line.

<b>RESOURCE:</b>	<b>FOR HELP WITH:</b>
<b>GLOBAL COMPLIANCE DEPARTMENT</b>	Compliance concerns or questions relating to our compliance program, Code of Conduct, product promotion, business courtesies, interactions with healthcare professionals or conflicts of interest.
<b>LEGAL DEPARTMENT</b>	Questions or concerns relating to government or regulatory requests, records management, using Allergan facilities for political activities, collaborating with competitors, confidential business information, competition laws or insider trading.
<b>GLOBAL TRADE COMPLIANCE DEPARTMENT</b>	Questions and concerns related to trade compliance.
<b>FINANCE – INVESTOR RELATIONS DEPARTMENT</b>	Investor questions and concerns about financial reports or requests for company standards.
<b>CORPORATE AFFAIRS DEPARTMENT – MEDIA RELATIONS</b>	Questions and concerns related to public statements and media requests.
<b>GOVERNMENT AFFAIRS DEPARTMENT</b>	Questions and concerns related to political affairs and public policy.
<b>GLOBAL MEDICAL SCIENTIFIC INFORMATION DEPARTMENT</b>	Questions or requests for non-promotional, scientific information about our products.
<b>HUMAN RESOURCES</b>	Workplace-related questions and concerns and disclosing conflicts of interest.
<b>GLOBAL PRIVACY OFFICE</b>	Questions and concerns related to data privacy and protection.
<b>THE ALLERGAN INTEGRITY ACTION LINE</b>	Any issue, question or concern.