

Lupin U.S. Compliance and Ethics Program



Focus and Oversight

Lupin is committed to the highest standards of corporate conduct in all of our business dealings globally. At Lupin, all employees are expected to lead and foster a culture of ethical and compliant behavior.

Lupin has a Corporate Compliance and Ethics Office (CCEO), which focuses on the development and enhancement of our United States compliance program designed to meet external requirements, guided by our values of integrity, excellence and respect for people. The CCEO has access to and makes reports regarding compliance matters to the Chief Executive Officer and other senior-level leaders. The CCEO staff provides dedicated support to Lupin's leaders, employees and businesses.

Written Standards

Lupin's Code of Business Conduct and Ethics for the U.S. (the "Code"), is part of its global P.L.E.D.G.E (Preparing Lupin Employees to Demonstrate Corporate Governance and Ethical Conduct), and sets forth the core values, standards and guidelines for employee conduct. It explains the company's expectation for ethical and compliant behavior for those who work for Lupin or on behalf of the company. It consists of principle statements that provide clear expectations of conduct that are consistent with Lupin's values of Integrity, Passion for Excellence, Teamwork, Entrepreneurial Spirit, Respect and Care and Customer Focus. It emphasizes Lupin's commitment to integrity in every relationship and with every transaction.

In addition to the Code, Lupin has policies and guidelines. They encompass relevant laws and regulations. They also take into account industry best practices, including provisions of the Pharmaceutical Research and Manufacturers of America's (PhRMA) Code on Interactions with Health Care Professionals. Guidance documents are reviewed and updated to reflect current laws and regulations.

Training and Education

Lupin is committed to providing effective training and education for its employees to help ensure an understanding of Lupin values, the Code, U.S. Corporate Compliance and Ethics Program (CCEP), individual employee obligations and company policies. Targeted trainings are mandatory for individuals, especially those in key risk areas, such as pharmaceutical sales and marketing. The CCEO reviews and updates its training materials to provide employees with the most current information regarding policies and the law.

Open Lines of Communication

Lupin is committed to fostering dialogue between management and employees through multiple channels. It is Lupin's goal for employees to know where to turn when they are seeking answers to questions or reporting potential instances of violations of law, the Code and/or company

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policies and they are encouraged to contact their management, human resources, the CCEO or the hotline. Lupin's hotline is available to employees 24 hours a day, 7 days a week, to report potential violations or ask questions regarding legal obligations, policies, the Code and the CCEP. Any questions or reports may be submitted by telephone to 844-815-3731 or online at Lupin.ethicspoint.com. Anonymity and translation services are available. For any questions about the Lupin hotline or the CCEP, please contact the CCEO at ComplianceOffice@Lupin.com.

Auditing and Monitoring

Lupin's CCEP includes ongoing efforts to assess, evaluate, monitor and audit compliance with the law, the Code, policies and procedures. The nature, extent and frequency of these activities depend on a variety of factors, including new regulatory requirements, changes in business practices and other considerations. The CCEO reports assessment, audit and monitoring results to leadership and corporate governance committees.

Accountability

Lupin's CCEP includes accountability and disciplinary principles. Lupin employees and personnel that conduct business on behalf of the company are expected to adhere to the law, the Code and Lupin policies. Violations of the same can have serious consequences, including disciplinary action up to and including termination of employment, as well as possible civil or criminal penalties. Although each situation is considered on a case-by-case basis, Lupin imposes discipline to address inappropriate conduct and to deter future violations. Employees that fail to report violations may also be subject to disciplinary action. Lupin does not tolerate retaliation against anyone who makes a good-faith report of violations.

Lupin will communicate results of investigations of violations, audits and monitoring to management and corporate governance committees. In addition to disciplinary action and communicating results to the appropriate staff and business leaders, Lupin also assesses whether a violation may be due in part to gaps in Lupin's policies, training, business practices or other controls. If so, Lupin is committed to implementing corrective measures to enhance its controls to prevent further violations.

California Statement of Compliance

Declaration of Compliance and Annual Spending Limit pursuant to California Law

July 2020 – Lupin hereby declares that to the best of its knowledge, information and belief, it is in material compliance with its U.S. Corporate Compliance and Ethics Program (CCEP) and its good faith understanding of the requirements of California Health and Safety Code §§ 119400-119402. Lupin has developed its CCEP to be tailored to the size, organizational structure and resources of

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the business and it is reasonably intended to satisfy the compliance goals set forth by the State of California. Compliance is a dynamic concept and, therefore, while the CCEP is intended to prevent improper conduct from occurring, it cannot entirely eliminate improper conduct. Accordingly, Lupin does not represent that it can eliminate improper conduct or completely prevent individual employees from engaging in improper conduct. Through the CCEP, Lupin has established mechanisms to identify suspected improper conduct and to take appropriate disciplinary and/or corrective action in the event that improper conduct occurs. Lupin periodically assesses the effectiveness of its CCEP and implements changes as needed.

For a copy of this declaration of compliance and a description of Lupin's CCEP, call 844-815-3731 or email the CCEO at ComplianceOffice@Lupin.com.

For purposes of complying with the California Health & Safety Code § 119402(d)(1), Lupin has established an annual limit of \$2000 for spending on promotional items and activities provided to a health care professional licensed in California. The following expenses are excluded from the limit: expenses of a de minimis value (i.e., with a value of \$10 or less), expenses that are directly associated with payments statutorily excluded from the limit (e.g., meals for consultants), items provided to health care professionals that are ultimately intended for patients or consumers, fellowships, receptions at third-party educational or professional meetings and sales aids. Additionally, pursuant to California Health & Safety Code § 119402(d)(2) and (3), drug samples given to healthcare professionals intended for free distribution to patients, Lupin financial support for continuing medical education forums, financial support for health educational scholarships, and fair market value payments made for legitimate services provided by a health care medical professional to Lupin, including but not limited to consulting, have also been excluded from the spending limit.