Lilly Supplier Code of Business Conduct

Lilly is committed to acting with integrity. We build trust with our customers, regulators, and the general public through the manner in which we conduct our business. Our suppliers play an important role to help earn and maintain trust and respect by conducting Lilly business in accordance with Lilly values.

Lilly expects its employees and suppliers to conduct Lilly business consistent with the Lilly values of Integrity, Excellence, and Respect for People as reflected in the commitments stated below.

**Interactions**

» We behave ethically in business relationships, dealings, and activities. We practice the highest standards of business conduct.

» We comply with all laws, regulations, industry codes of practice, and Lilly policies, standards, and procedures that apply to our business activities.

» We don’t offer, provide, authorize, or accept anything of value—or give the appearance that we do—in order to inappropriately influence a decision or gain an unfair advantage.

» We compete ethically. We do not engage in unethical or other unfair competitive practices, but rely on the merits of our products and people.

» We do not allow our business dealings to be influenced by personal or family conflicts of interest.

» We select suppliers based on the merit and value of their products and services. We do not accept gifts, entertainment, or favors from them that could affect or appear to affect our business judgment.

» We communicate honestly in all areas in which we engage externally about Lilly business, products, policies, and activities. Only authorized representatives of Lilly communicate on Lilly’s behalf.

» We provide information about Lilly products that is approved by Lilly, consistent with the approved label, and that presents benefits and risks in an accurate, fair, and balanced manner. We manage the production and dissemination of this information carefully so that it is current.

**Workplace**

» We conduct our business activities with respect for people and a commitment to human rights, diversity, equal opportunity, and freedom from exposure to improper conduct, including acts of discrimination, retaliation, or harassment. We resolve concerns and issues in an appropriate manner, without retaliation.

» We protect the workplace, including Lilly’s physical assets and electronic resources, from loss, theft, or damage. Report theft, security emergencies, and personal injuries to Lilly sponsors and to local Lilly security, if available in that location.

» We work to assure a reliable supply of quality products, and accurate and complete product, safety, and efficacy information. We take precautions to protect the quality and integrity of our products in the supply chain.

» We expect that our suppliers will source their materials responsibly and abstain from procuring materials from all conflict areas or sources including the Democratic Republic of Congo. We expect that our suppliers conduct their own due diligence regarding the source of any materials they provide to us in order to ensure those materials are obtained from areas that are conflict-free.

» We create and maintain safe and healthful working conditions, and we respect and protect the environment, conducting our operations to minimize adverse environmental effects.

» We bring our full selves to work each day. To that end, we ensure that we are not impaired with drugs or alcohol while at work so that we can be fully engaged and help make life better for people around the world.

» We respect and protect the welfare of animals used in research, complying with all legal and Lilly requirements that govern the care and use of animals in research.
**Information**

- We safeguard and make proper use of confidential information as a valuable company asset. Confidential information is any information not in the public domain. Lilly owns and retains the right to access Lilly information regardless of how, why, where, or by whom it is produced.
- We obtain appropriate Lilly approval before communicating or disclosing externally in a public forum or any forum accessible by the public, any information related to Lilly.
- We do not improperly disclose or take advantage of nonpublic Lilly, alliance, or third-party information.
- We use electronic services and tools with due consideration for the sensitivity of the information being stored, communicated, or transferred and the potential risks of the information being lost or exposed.
- We conduct Lilly clinical research and development activities consistent with bioethics principles and sound scientific methodologies, focusing on the safety and well-being of research participants.
- We follow Lilly processes for the handling and publication of Lilly scientific information (whether written, oral, or electronic). We only publish scientific information that is accurate, objective, balanced, and timely.

**Transactions**

- We create and maintain, in reasonable detail, accurate Lilly books, records, and accounts. We provide reliable and trustworthy financial statements that reflect Lilly transactions.
- We do not make, arrange to have made, or fail to correct or report any false, misleading, or artificial entries in Lilly records or those of others with whom we do business.
- We have appropriate authority and secure the required Lilly approvals before acquiring or committing Lilly resources, entering into agreements with external parties, disbursing Lilly funds, and/or entering into special transactions noted in Lilly policies, standards, and procedures. We require authorization from procurement and appropriate supporting documentation before purchasing goods or services.
- When involved in contracting, we verify that the contract accurately reflects the nature, value, and content of the proposed Lilly transactions and relationships. Discuss with Procurement, Lilly Supplier Management, or a Lilly sponsor any instances of observed conduct or circumstances that are inconsistent with applicable contractual requirements.
- We publicly disclose financial interactions with and transfers of value to health care providers, health care organizations, and patient organizations not only as required by law but also in accordance with regional and/or local voluntary disclosure codes.
- We properly classify and value goods and technology and meet all applicable import and export requirements and restrictions before transferring them either electronically or physically (whether by sending or personally carrying them) between countries.
- We do not take any action that would support or respond to a request relating to a boycott of a country that is friendly to the United States. We follow applicable internal reporting and approval requirements for all requests received, even if Lilly does not intend to respond to or comply with the request.
- We do not engage in or commit to any Lilly transaction with countries subject to trade or economic sanctions or with individuals, groups, or entities that we are aware or have reason to believe appear on any government list of restricted, sanctioned, denied, or debarred parties without first verifying that the transaction is permissible.

*Lilly unites caring with discovery to make life better for people around the world.*
Reporting

» If you experience or observe actions that are not aligned with these commitments, Lilly wants to know so that we can learn and improve. Report all known or suspected violations and immediately report any concerns or potential breaches of personal information to Lilly sponsors, www.lillyethics.ethicspoint.com, or call 1-800-815-2481.

» Report to Lilly within five (5) calendar days if one of your employees is excluded or restricted in any way from doing business with any government.

» We take appropriate measures to prevent retaliation against persons who make these reports. Lilly does not tolerate retaliation for reporting inappropriate conduct, preventing unlawful practices, or participating in an investigation.

For Human Health Products and Devices

» Report any known or suspected death or suspect product immediately (within 24 hours of receipt) by calling The Lilly Answers Center (TLAC), 1.800.LillyRx (1.800.545.5979).

» Report any other adverse event or product complaint within one business day by calling The Lilly Answers Center (TLAC), 1.800.LillyRx (1.800.545.5979) or by using an alternative reporting method as determined by the Lilly component.

Lilly appreciates your shared commitment to acting with integrity. Contact your employer or Lilly sponsor for details to support these commitments and other elements of Lilly’s ethics and compliance program.

Together, we act with transparency, honesty, and integrity, knowing that every interaction is an opportunity to improve patient care and build trust with those we serve.