

# Lilly Supplier Code of Business Conduct

At Lilly, we unite caring with discovery to create medicines that make life better for people around the world. In the nearly 150 years we've been in business, we've developed and delivered trusted medicines that help people get better, feel better, and live better.

We are committed to upholding high standards of corporate conduct in our business dealings around the world. This commitment to operating ethically and responsibly helps us earn and maintain the trust of customers, regulators, and society as a whole.

**We expect our suppliers and employees to conduct Lilly business consistent with these standards and the Lilly values of Integrity, Excellence, and Respect for People as reflected in the statements 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 rather we 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 do not allow our suppliers to offer gifts or donations on Lilly's behalf without prior written approval.
- » 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 affirm and support 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 are committed to uphold the human and employment rights of workers and to treat them with dignity and respect. For example, we do not use forced, bonded or indentured labor or involuntary prison labor and no worker should pay for a job or be denied freedom of movement. We do not use child labor (except as consistent with applicable law, such as cooperative learning programs). In addition, we pay employees consistent with applicable wage laws, including minimum wages, overtime hours and any mandated benefits, and communicate with employees in a timely manner regarding the basis on which they are being compensated. We also encourage open communication and direct engagement with workers to resolve workplace and compensation issues.
- » We protect the workplace, including Lilly's physical assets and electronic resources, from loss, theft, or damage. Theft, security emergencies, and personal injuries must be reported 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 follow all approved standards, procedures, and processes and complete all required training before performing an activity or task.
- » 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's 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 protect, respect, and do not knowingly violate the information rights of others.
- » 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 keep our promises and are respectful of an individual's privacy, and we demonstrate, in every business operation, in every location around the world, that people can trust us with their personal information, whether it is obtained from an employee, a customer, or another individual. We take reasonable precautions to safeguard personal information against loss, misuse, theft, unauthorized access, disclosure, modification, or destruction.
- » 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, assessment by third party risk management, and appropriate supporting contractual documentation before purchasing goods or services.
- » When involved in contracting, we verify that the contract accurately reflects the nature, value, risk and content of the proposed Lilly transactions and relationships. Any instances of observed conduct or circumstances that are inconsistent with applicable contractual requirements should be discussed with Procurement, the Third Party Management Office, or a Lilly sponsor.
- » 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.

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## 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 or the Lilly Ethics & Compliance Hotline ([www.lillyethics.ethicspoint.com](http://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.
- » Report any known or suspected death or suspect product immediately (within 24 hours of receipt). Report any other adverse event or product complaint within one business day.

### **In the US:**

- Call The Lilly Answers Center (TLAC), 1.800.LillyRx (1.800.545.5979) or use an alternative reporting method as determined by the Lilly component.

### **Outside the US:**

- Select your location from the globe link in the upper right corner of Lilly.com then click on "Contact" or "Contact Us" in top menu bar to access the appropriate local reporting method.

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.