



CODE of CONDUCT

we are responsible



Message from our CEO

Dear Colleagues,

Since its founding in 1887, Perrigo has been committed to operating with integrity. That commitment has helped us earn an outstanding reputation in the business community for “doing the right thing.”

While a solid corporate reputation is developed over years, it must be nurtured through our day-to-day activities. That is why each of us must remain vigilant in making sure we always do the right thing. Perrigo’s success depends on this as even a minor violation of law or regulation can cause significant harm to our business and reputation.

Our Code of Conduct, “We are Responsible,” is a resource to help ensure that we act with integrity and safeguard Perrigo’s reputation. It contains the global standards we must follow to ensure that we uphold our Core Values, and it provides principles to guide our conduct and help us make sound and appropriate decisions.

The Code applies to all of us, no matter what position we hold or the location where we work. It is important that you read and understand the Code and ask questions if you need clarification on any topic. It is equally important that you report any known or suspected misconduct, even when doing so could be difficult, to your supervisor or any of the other resources referenced in the Code.

Remember, we are all responsible for upholding Perrigo’s reputation by doing the right thing. Together, I am confident that Perrigo will continue to maintain its long-standing reputation for integrity and responsible conduct. Thank you for joining me in this effort.

Murray S. Kessler
Chief Executive Officer



“While a solid corporate reputation is developed over years, it must be nurtured through our day-to-day activities.”



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Our Core Values

Integrity

We do what is right.

- We are committed to conducting our business with individual and organizational integrity.
- We comply with applicable laws and avoid conflicts of interest.
- We are reliable, honest and trustworthy in our dealings.

Respect

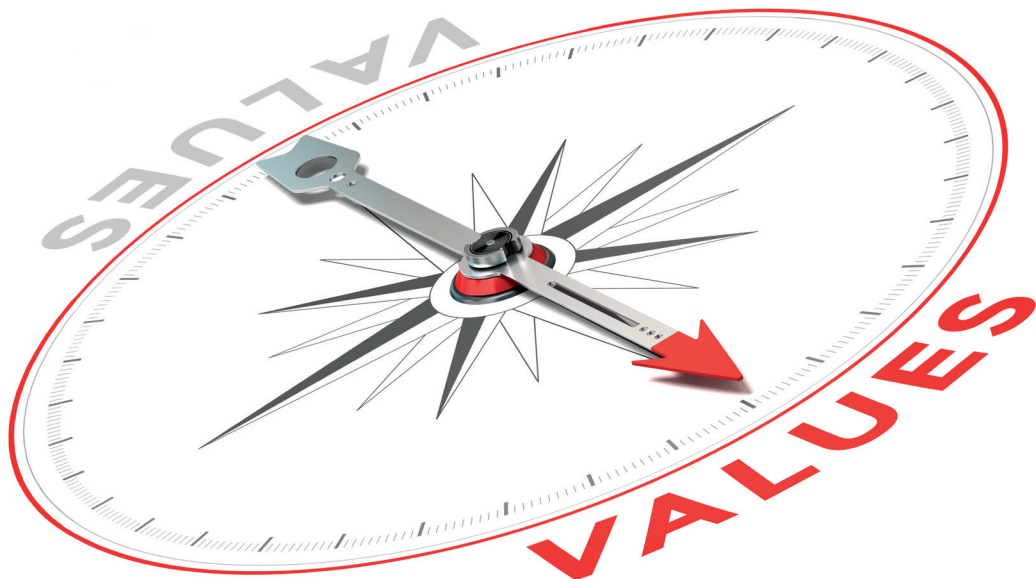
We demonstrate the value we hold for one another.

- We act with respect towards our colleagues and others with whom we interact.
- We communicate openly and candidly and address our differences professionally.
- We emphasize teamwork, value each person's contribution, and collaborate with confidence and trust.

Responsibility

We hold ourselves accountable for our actions.

- We accept personal responsibility for everything that we do, and we lead by example.
- We treat the Company's reputation as our own and try to make wise use of our time and the Company's resources.
- We take responsibility for performing at our best and strive to achieve our own and the Company's potential.
- We are committed to a culture of shared responsibility that promotes a safe, healthy and high performing workforce.



Getting started

Why do we have a Code?

Our Code outlines the behaviors we must follow to uphold Perrigo's Core Values and ethical standards. It shows us how to evaluate

ethical dilemmas and provides the contact information we should use when we have questions or concerns.

Who must follow this Code?

All Perrigo employees, officers, directors, temporary employees, contractors, consultants, ("Personnel") are required to act according to the principles set forth in our Code.

Any third party working on Perrigo's behalf, such as agents and suppliers, are also expected to adhere to our Code. We should never ask a third party to engage in any activity that violates the standards in our Code.

Any waiver of this Code for executive officers or directors may be made only by the Board of Directors. These waivers will be promptly disclosed as required by law or regulations. The General Counsel must approve waivers of this Code of Conduct for all others.

How to use the Code of Conduct

- Know your responsibilities.
- Read the Code and familiarize yourself with its standards.
- Know the resources available to you when you have questions or concerns.
- Understand how to use the Decision Tool.

Our Responsibilities

Conduct our business according to ethical and legal standards.

As Perrigo **personnel**, we commit to understand and follow the principles set forth in this Code. This means we are required to:

- Conduct our business according to ethical and legal standards and follow all applicable laws, regulations and policies. Ignorance cannot justify anyone doing the wrong thing.
- Report concerns and known or suspected misconduct immediately. Do not assume that someone else will raise a concern.

As Perrigo **executives and managers**, we have additional responsibilities. Specifically, we must:

- Act as role models, holding ourselves to the standards of ethical business conduct.
- Reinforce our Code through regular communication.
- Create a positive work environment where everyone is comfortable raising questions and concerns.
- Monitor business conduct to ensure compliance with our Code.
- Ensure everyone completes all required trainings.
- Annually certify compliance with our Code and other policies.
- Immediately report any known or suspected misconduct and never retaliate or ignore acts of retaliation against others.



Where do I seek guidance ?

Our Code provides guidance on some common legal and ethical issues that you might encounter. However, it cannot address every situation.

When you face an ethical dilemma, use the Decision Tool on page 18 to evaluate the problem.

While conducting business across borders you may come across situations where another country's local law, custom or practice conflicts with Irish or U.S. law, corporate

policies or this Code. In such circumstances, we must always adhere to the law, custom or practice that is most stringent.

You can contact the following resources for guidance :

- Your supervisor or another manager
- Human Resources
- Your local Compliance Coordinator
- Global Corporate Compliance and Privacy
- Legal Department

How should I report concerns or issues?

If you are aware of or suspect misconduct, you have a responsibility to report it.

Please report your concern to one of the resources on page 19.

Perrigo will investigate all reports promptly, thoroughly and fairly, taking appropriate

action as necessary. You are expected to participate in an investigation when asked, and every effort will be made to safeguard your confidentiality both during and after the investigation.

What if I want to make an anonymous report?

You can submit an anonymous concern, either by telephone or online, to the ethics hotline (our third-party reporting system, EthicsPoint). This system is available 24 hours a day, 7 days a week.

If you choose to make an anonymous report, your anonymity will be protected to the fullest extent possible. Keep in mind, however, that maintaining your anonymity may limit

our Company's ability to investigate your concerns.

Due to data privacy regulations, certain jurisdictions may not allow the use of hotlines to report issues anonymously. If you are in such a jurisdiction, please contact any resources identified above for further guidance.

What if I am concerned about retaliation?

Perrigo will not retaliate and prohibits retaliation against individuals who report, in good faith, a concern about potential illegal or unethical conduct or a violation of the Code or Company policies. A “good faith” report means that you have provided all information you have and you believe it to be true.

In addition, our Company prohibits retaliation against anyone who assists or participates in

the resolution of a report or in an internal or external investigation or proceeding. When requested, we are required to assist and actively participate in these investigations.

Retaliatory acts may lead to disciplinary action, up to and including termination. If you believe you have experienced retaliation, you should report it immediately.

What are the consequences for violating the Code?

Violating the Code may lead to serious consequences, including disciplinary action, up to and including termination of employment or contract.

Those violating the Code may also face personal civil and/or criminal liability. We will promptly investigate all potential violations.

For more specific information about non-retaliation,
see the Whistleblower Policy located in
the Global Policies section on Inside Perrigo.



Perrigo's Code

We Are Responsible for Complying with the Law, Policies and Procedures

Acting with integrity is vital for maintaining our reputation with our customers, consumers, shareholders and other stakeholders. As part of a global company, each of us must comply with the letter and spirit of applicable laws, rules and regulations in the countries in which we operate.

Even minor violations of laws and regulations can be costly to Perrigo and subject both the

Company and you personally to civil and/or criminal penalties. Each of us is responsible for understanding the laws and regulations that relate to our responsibilities. When you do not understand them, seek guidance.

This Code references corporate policies that provide more detailed information. You are expected to review and comply with these policies.



Q Where can I find Perrigo's global policies?

A For a listing of Perrigo global policies go to Inside Perrigo > Global Policies.
For additional site-specific policies please contact your manager.
For those sites that do not have access to the SharePoint site please contact Global Corporate Compliance and Privacy at GlobalCorporateCompliance@perrigo.com.

We Are Responsible for Building Trusting Relationships

Building and maintaining vital relationships is critical to our success.

Consumer health and safety

The safety and quality of our products are vitally important. Consumers seek our products because they trust that every product we make will be of the highest quality. It is critical that we follow all quality, safety and Good Manufacturing policies and procedures.

Product packaging and promotional materials

We follow rigorous laws, regulations and corporate policies to ensure that our packaging and promotional materials are accurate and adhere to appropriate marketing and advertising practices.

Current Good Manufacturing Practices

As a pharmaceutical company, we are governed by Current Good Manufacturing Practices and other country-specific quality requirements for developing, manufacturing and packaging our products.

Following these requirements ensures that we retain a strong reputation for product quality.

In the rare situations when consumer safety may be compromised and a recall is required, it is important that you follow all product recall procedures and comply with applicable United States Food and Drug Administration or other country-specific regulations.

Defective products and adverse events

Any concerns about product safety, quality and adverse events must be reported as soon as possible so they can be quickly addressed and resolved.

Procurement

Purchasing decisions should be made based on objective and impartial information. We treat current and potential suppliers fairly during the sourcing process and comply with all laws, regulations and industry codes and Perrigo policies that apply to our supplier interactions.

Q

At a party, a friend mentioned that his mother had a severe headache after taking a Perrigo product. Do I need to report this?

A

Yes, you must report all adverse events related to Perrigo products that come to your attention. Although it may turn out that the event was not, in fact, caused by a Perrigo product, it is important that we investigate all possible incidents.



We Are Responsible for Dealing Fairly with Others

We will succeed based on the quality and value of our products and not by illegal or otherwise improper business practices. Competition laws, also known as “antitrust” laws, generally prohibit agreements with competitors, suppliers or customers that could unfairly limit free and open competition.

Perrigo actions

To promote fair competition, it is important that we do not unfairly differentiate in prices offered to various customers, set unfair prices below cost or make false statements about competitors.

Relationships with competitors

It is important that we use caution when interacting with competitors. Even the appearance of cooperating with competitors can damage our reputation and legal standing. We must never work with competitors to fix prices, rig bids, allocate markets among us, boycott certain organizations or industry segments, or make other non-competitive agreements.

Relationships with customers and suppliers

Agreeing to set resale prices, requiring a partner to buy from us in order for us to buy from them, or requiring a partner to buy certain non-related products or services in order to purchase others are all actions that can damage Perrigo’s reputation and lead to serious consequences for the Company and individuals involved.

For more information, refer to the **Fair Competition and Antitrust Policy** located in the Global Policies section of Inside Perrigo or contact the Legal Department.

A business contact that seems innocent - such as lunch with a competitor’s employee or a business chat at an industry conference - may be viewed as violating antitrust laws.

Q

It is almost the end of the fiscal year and we have money left in our budget. Is it acceptable to use up that budget by pre-paying a vendor for services we know we will need next year?

A

No, pre-paying vendors or other parties for goods and services that have not been completed is not acceptable. Activities must be charged to the fiscal year in which they take place.

We Are Responsible for Protecting Our Shareholders' Assets

We must appropriately use and manage Perrigo's assets, including its equipment, supplies, funds, records, information and reputation. We must always safeguard these assets, avoid waste and make the best use of these assets.

Ensuring accurate books, records and financial reporting

All of us are responsible for ensuring Perrigo's books, records, and accounts accurately reflect Perrigo's financial condition and operations. This includes ensuring proper completion and submission of time sheets, invoices, expense reports, payroll, benefits records and performance evaluations. It also means timely completion and filing of all documents that we are required to submit to regulators.

Safeguarding information

Preserving Perrigo's reputation means that we have a responsibility to protect the confidential and proprietary information we produce daily. This information includes intellectual property, business and financial information (for example, sales, earnings and balance sheet items), business forecasts, business plans, acquisition strategies and other information that might benefit competitors or harm Perrigo or our customers if disclosed. Our responsibility extends to

information entrusted to Perrigo that belongs to our customers or other business partners.

Privacy

Perrigo uses Personal Data for a wide variety of purposes including, but not limited to, payroll, financial transactions, sales and marketing, patient safety data. The Company will comply with applicable privacy laws regarding the proper collection, storing, processing, transferring, and accessing this information. See the **Global Privacy Policy** for further information.

Properly using computers, networks, e-mail and the Internet

Perrigo maintains a wide range of electronic devices and networks to help the organization work as effectively as possible.

While mobile phones, internet access, e-mail and other systems can enhance your productivity, they must be used appropriately to prevent exposure of our data and systems to security risks.

Certain employees and directors have additional responsibilities related to financial reporting and safeguarding Perrigo information. Refer to the Global Policies section of the intranet for additional information.



- Use strong passwords and maintain the confidentiality of your credentials
- Only use hardware and software authorized and distributed by Perrigo IT&S
- Do not display, procure or transmit inappropriate material, including abusive or objectionable language, and information that is illegal or obscene
- Use Perrigo provided secure collaboration tools for business activities

While incidental personal use of Perrigo systems is permitted, do not expect privacy to be guaranteed, except where mandated by law.

More information about the use of Perrigo systems is provided in the **Corporate Information and Security Policy** posted in the Global Policies section on Inside Perrigo.

Social Media use

Social media outlets are popular forums to listen to, learn from and engage with others. Use caution when using outlets such as blogs, social networking sites (e.g., Facebook Twitter, and LinkedIn), etc., especially if making references to Perrigo or our products. There is a big difference between speaking “about” Perrigo and speaking “on behalf of” Perrigo. When speaking about our company on social media or in other public forums, you are only permitted to share publicly available information or reference information on the

Perrigo.com website. All individuals engaging in social activities must follow the **Guidelines on Social Media Communications**.

Keep in mind only a small number of individuals are permitted to speak on behalf of the Company. If you see information posted in an online forum that is critical of Perrigo or our industry, do not respond. Instead, notify Global Investor Relations & Corporate Communications. Please contact this department if you have any questions about whether specific information is public or not.

The vast majority of the information, documents or data used to perform our job duties are for internal use only. We may disclose or communicate this information to individuals outside of Perrigo only when we are specifically authorized to do so.

Q

I was using the Internet at home and came across a blog where sensitive Perrigo information was being shared. What should I do?

A

Disclosure of confidential Perrigo information is prohibited and could jeopardize our business objectives. You should promptly notify your supervisor or the Global Corporate Compliance and Privacy Department.

Inside information/insider trading

It is illegal to buy or sell securities (i.e., stocks, options, etc.) when you are aware of material, non-public (or “inside”) information. Material inside information is any information that, if it were made public, could affect any investor’s decision to buy or sell a Company’s stock.

Making trades based on inside information violates both civil and criminal law. You must protect all non-public information from unauthorized access.

For more information and additional responsibilities for certain groups of personnel, see the **Policy on Insider Trading and Securities Transactions** posted in the Global Policies section of Inside Perrigo.

Product diversion

As a pharmaceutical company, it is important that our raw materials and finished products are not diverted for any purpose, including the manufacturing of illegal drugs. We must account for all materials and products, and safeguard these materials from unauthorized access.



We Are Responsible for Avoiding Conflicts of Interest

We must act in Perrigo's best interests. We must not use the Company's property or information, or our position within the Company, for personal gain. This includes avoiding direct and indirect competition with the Company as well as situations that could be perceived as conflicts.

Outside employment and service

We must not request or accept salaries, fees, commissions or other compensation from anyone (including organizations) with current or potential business ties to Perrigo or one of our competitors. We also cannot serve with an organization that has current or potential business ties to Perrigo, even if compensation is not paid. Exceptions require the approval of the Board or a Board committee (for directors or executive officers) or the General Counsel (for all other employees).

Financial interests

We cannot hold a financial or other interest in Perrigo's suppliers, customers or competitors, except for a holding that is not likely to provide the appearance that our business judgment is compromised. Exceptions must be reviewed by Perrigo's General Counsel to ensure that the interest will not interfere with responsibilities to Perrigo. A financial interest does not include security holdings of a supplier, customer or competitor in mutual or index funds or similar investments where the individual does not have direct investment control.

Vendors with close personal or financial ties

Individuals should avoid conflicts of interest when working with vendors that have close personal or financial ties to personnel. For example, when a vendor employs a relative or a personal friend of a Perrigo employee, that employee should not be involved in any decisions related to the vendor. When in doubt, please refer questions to the Global Corporate Compliance and Privacy Department.

Gifts, hospitality and payments

Receiving Gifts

We must not request or accept gifts including cash or cash equivalents or favors greater than nominal value from individuals or organizations with current or potential business ties to Perrigo. Any gift received valued at more than nominal value must be returned to the provider. Perishable items greater than nominal value can only be accepted for a group of employees where the average value per participating employee is nominal.

If you are unsure what constitutes a conflict, please contact your manager or check one of the other resources on page 19.

Giving Gifts

We must not give gifts or favors greater than nominal value to individuals or organizations with current or potential business ties to Perrigo.

In some instances, gift giving of any type may not be appropriate due to applicable national and regional industry association codes or applicable laws, regulations and other industry standards.

If you have questions regarding giving and receiving of gifts, contact the Global Corporate Compliance and Privacy Department.

Hospitality

Any hospitality provided or received with customers, suppliers and other business partners should be reasonable, in compliance with the **Corporate Travel and Entertainment Policy** and not likely to give the impression that the hospitality will influence an individual's judgment.

Payments

You should not provide to or receive from current or potential customers, suppliers or external business partners any form of payment, such as cash or gift certificates.



Q

What is considered to be “nominal value”?

A

Any gift with a value that is insignificant or small; a token gesture; anything that when given is or can be perceived as highly unlikely to affect one's judgment or decisions. Typically, small promotional items, such as inexpensive pens or coffee mugs with a company logo, qualify as having nominal value. If you are unsure, ask your manager or check one of the resources on page 19 for help.



We Are Responsible for Fostering a Positive Work Environment

Perrigo is committed to maintaining a work environment where everyone feels comfortable, valued and safe, no matter where you are in our global organization. This means that we respect our colleagues, their property, their self-esteem and their contributions to the overall success of Perrigo.

Non-discrimination/Diversity

We are committed to providing a positive work environment that promotes equal employment opportunities and is free from all forms of illegal and improper discrimination and harassment, including sexual harassment.

We seek to ensure that each one of us is treated with fairness and dignity. We are fully committed to providing our applicants and employees equal employment opportunities in compliance with all applicable national, regional, state and local laws governing non-discrimination in employment in every location in which the Company operates.

That means we recruit, hire, train, promote, compensate, develop and retain the most qualified people from a diverse candidate pool. Accordingly, any unfair treatment by or directed to any personnel, applicant, guest, customer or supplier that is based on or motivated by race, color, age, sex, sexual orientation, religion, national origin, citizenship status, genetic information, height, weight, non-disqualifying-disability, marital status, veteran status, gender identity, gender expression, or any other status protected by law or by Perrigo policy is not acceptable and is forbidden.



Prohibition against harassment

Perrigo prohibits harassment of any kind based on any of the characteristics listed in the section “Non-discrimination/Diversity”. Harassment includes verbal, physical, written or other conduct that is reasonably considered unwelcome, offensive, intimidating or disparaging to any individual. Furthermore, Perrigo will not tolerate retaliation against any person who raises concerns about discrimination or harassment.

Safe workplace practices

We are committed to providing a safe work environment at Perrigo through strict standards and a robust safety program. It is important that everyone promotes safety and reports possible safety hazards.

Ensuring our safety also means avoiding the use of illegal drugs, alcohol or other medications and substances that could compromise your or others’ safety or product quality and to protect the Company’s reputation, property, and operation.

Health and well-being of personnel and their families

We are committed to providing resources and programs that support the health and well-being of personnel and their families. People with a commitment to healthy habits live longer, happier and more productive lives.



We Are Responsible for Conducting Business with Respect for Local Conditions

Each country presents unique challenges and concerns. We must be mindful of different approaches to conducting business while ensuring that we follow local laws, regulations and corporate policies while demonstrating Perrigo's Core Values and standards.

Anti-corruption

We must not engage (giving, receiving or offering) directly or indirectly (through a third party) in bribery, facilitation payments, kickbacks or any other form of corruption. Even the appearance of engaging in such activities can expose Perrigo to legal action and severely impact Perrigo's reputation. We must also maintain accurate books and records and a system of internal controls.

If anyone ever directly or indirectly solicits a payment from you, contact Perrigo's General Counsel for assistance. Additional anti-corruption information is provided in the **Anti-Corruption Policy** and **Procedure for Engaging Third-Parties in High Risk Countries**, both of which are available in the Global Policies section on Inside Perrigo.

Import/export and boycotts

If your job responsibilities are in any way related to the import or export of materials and information, it is important that you are familiar with import/export laws and Perrigo's related policies and procedures. This includes the transmission of technical data across national borders using the Internet or other electronic means.

Also, at times governments may impose boycotts or restrict trade as part of foreign policy and national security activities. Please contact the General Counsel immediately before taking any action if you receive any boycott-related requests.

Import - Includes bringing goods and materials that we purchase from a foreign or external source into another country.

Export - Includes products, software, technology or information that is shipped, physically or electronically, to another country.

We Are Responsible for Supporting Our Communities and the Public

The communities in which we operate provide us with a strong workforce, useful resources and respectful neighbors. In return, we must show that we are a responsible corporate citizen. This means that we should respect and protect the environment from adverse impacts as a result of our operations, engage in the political process in a responsible manner, and fulfill our obligations to provide appropriate information to regulatory and legal authorities and the public. See our Corporate Social Responsibility Report that is available on Inside Perrigo for further details.

Political contributions and activities

Various laws restrict a company's involvement in campaigns, lobbying and other political activities. Therefore, we cannot use Perrigo's funds or assets to support a political party, committee or candidate. Perrigo will not reimburse personnel for political contributions, and Perrigo does not make political contributions.

Although Perrigo encourages you to exercise your right to participate in the political process, it is important that you do so as individuals, without suggesting Perrigo's support, and that you do so responsibly and in compliance with all applicable laws. You may not use Company time, funds, facilities or assets for political purposes.

External communications

External communication must only be conducted by authorized individuals. If communicating with the media, financial analysts, regulators, law enforcement and the general public is not part of your job description, you should refer any external contact to the appropriate personnel within Perrigo:

Media or community leaders

Direct all inquiries or requests for interviews to Perrigo's Global Investor Relations & Corporate Communications team

General Public

- Refer inquiries or concerns about product quality or availability to the appropriate Consumer Affairs team.
- For external speaking engagements, you must secure prior approval from your business segment or functional leader, as well as Global Investor Relations & Communications.
- All materials for speaking engagements must be reviewed by Global Investor Relations & Corporate Communications.

Financial analysts or shareholders

Direct all requests to Perrigo's Vice President of Global Investor Relations & Corporate Communications or Perrigo's Chief Financial Officer.

Regulatory Agencies

If you receive any contact from a Regulatory Agency, take the person's contact information and immediately notify your manager.

Law enforcement

Direct inquiries to Security or the Legal Department.

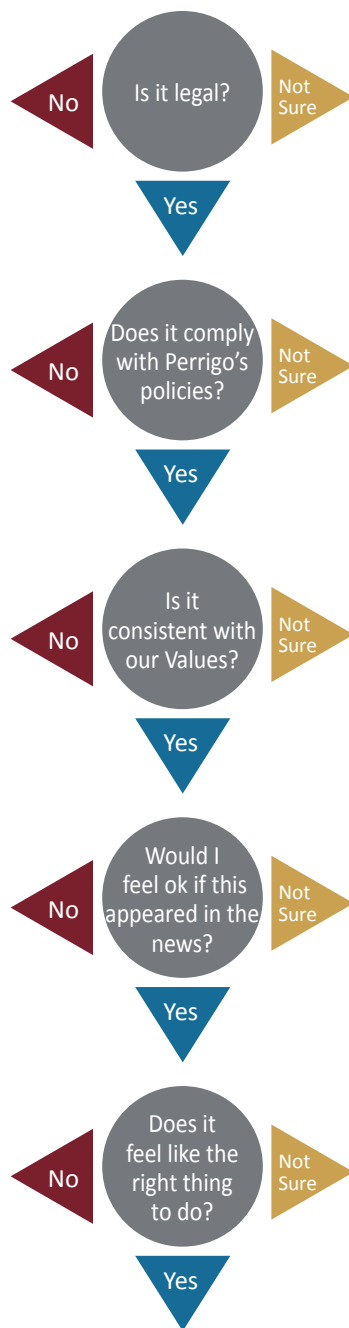
Our standards regarding improper payments, gifts and political contributions apply when we are engaged in business dealings globally.



Decision Tool

Use this Decision Tool when you face a difficult decision. If you are still unsure what course of action to take, talk to your manager, Compliance Coordinator, Global Corporate Compliance and Privacy or Legal to seek clarification. Also, see the resources listed on page 19.

Do not do it!
There may be
serious
consequences



**Consult your manager,
Compliance Coordinator,
Global Corporate
Compliance and Privacy
or Legal for guidance.**

Thank you for doing the right thing

Resources

The resources below are available to assist you with questions about the Code of Conduct or other policies as well as concerns about business conduct:

Perrigo Intranet Site

For a listing of Perrigo global policies, go to Inside Perrigo > Global Policies.

For additional site-specific policies, please contact your local manager.

Your Supervisor or Manager

This person is your principal resource since they know your job duties and how they may be impacted by certain policies or situations.

Another Senior Manager or your Local Compliance Coordinator or Compliance Committee Member

If your supervisor or manager is unavailable, or if you are uncomfortable discussing the issue with this person, you should contact another senior manager, your Local Compliance Coordinator or Compliance Committee Member.

Human Resources Department

If you have questions about employment or employee relations issues, contact the HR Department.

Finance Department

If you have questions about financial or accounting matters, contact the Finance Department.

Global Corporate Compliance and Privacy or the Legal Department

If you have questions regarding the interpretation or implementation of specific corporate policies, please contact these departments.

The Board of Directors

If you believe your concern can only be addressed by Perrigo's Board of Directors, we invite you to send your concern to our Board. When doing so, please mark the outside of the envelope with "confidential." You can choose to remain anonymous when submitting your concern.

Mail your concern to: Perrigo Board of Directors, in care of the General Counsel, Perrigo Company plc, Treasury Building, Lower Grand Canal Street, Dublin 2, Ireland.

Ethics Hotline

You can also submit a concern, either directly or anonymously (where allowed by local regulations), by telephone or online, to an independent third-party reporting system:

EthicsPoint

- Online at www.Perrigo.EthicsPoint.com
- Please see www.Perrigo.EthicsPoint.com for a local telephone number



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INTEGRITY
RESPECT
RESPONSIBILITY

**WE
ARE
RESPONSIBLE**

REPUTATION

CORE VALUES
CONDUCT
PRINCIPLES

CODE

INTEGRITY
RESPECT
RESPONSIBILITY

11/2018

