Code of Business Conduct and Ethics

Office of Global Compliance





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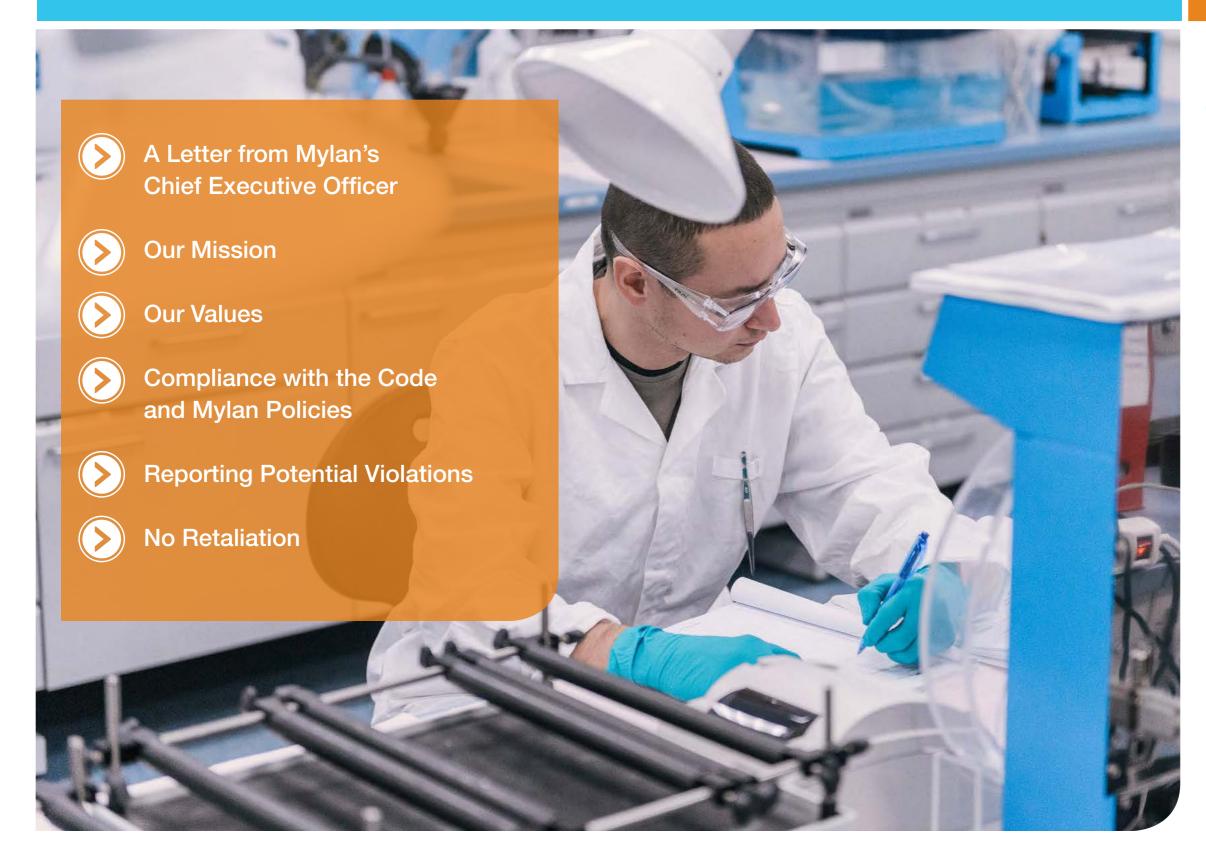


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INTRODUCTION





A Letter from Mylan's Chief Executive Officer

"For more than 50
years, Mylan has
built a culture
and reputation of
HIGH STANDARDS
and doing business
WITH INTEGRITY."





strong culture of compliance requires more than just knowing and following the rules. At Mylan, we are committed to setting new standards in healthcare. Working together around the world to provide 7 billion people access to high quality medicine, we innovate to satisfy unmet needs. We make reliability and service excellence a habit; do what's right, not what's easy; and impact the future through passionate global leadership. Our core values of Innovation, Integrity, Reliability, Service and Teamwork reflect who we are and what is important to us. For more than 50 years, Mylan has built a culture and reputation of high standards and doing business with integrity.

We all can be proud of what we have accomplished to this point, and we must always remember that compliance is a shared responsibility. Every one of us is personally responsible and accountable for our company's reputation and dedication to doing business with integrity. If we all continue to do our part, individually and together, compliance will remain an intrinsic component of our business strategy, to the benefit of each of us, as well as Mylan's customers, shareholders, the patients who use our products, and the communities in which we live and work.

Regards,

Heather Bresch

CEO, Mylan

Our Mission

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t Mylan, we are committed to setting new standards in healthcare. Working together around the world to provide 7 billion people access to high quality medicine, we:

- >innovate to satisfy unmet needs;
- >make reliability and service excellence a habit;
- >do what's right, not what's easy;
- >impact the future through passionate global leadership.

The Office of Global Compliance ("OGC") contributes to this mission by supporting Mylan's core value of doing business with Integrity. As we continue to grow, we make sure all Mylan team members understand and embrace our shared responsibility for compliance, and for meeting Mylan's high ethical standard of "doing what's right, and not what's easy."



Our Values





INNOVATION

We are unconventional,

visionary and bold. We

"connect the dots" others

and bring them to life. We

quo and introduce new

and better ways to help

a higher quality of life.

Having the courage to

change is in our DNA.

people everywhere enjoy

be a force for constructive

love to challenge the status

overlook. We see possibilities



INTEGRITY
Doing what's right is sacred to us. We behave responsibly, even when nobody's looking. We set high standards from which we never back down. This uncompromising ethical stance helps to keep our products pure, our workers safe and the environment clean.



RELIABILITY

Dependable. Reliable.
Call it what you will,
we've made it a habit.
We strive to be there
through thick and thin,
rain or shine, delivering on
every promise, every time.
That's why people around
the corner and across the
world count
on Mylan.



SERVICE

We understand that

"it's not about us" – it's
about helping others –
and we believe there's no
situation we can't handle.

We would do whatever it
takes, work 'round the
clock, cross any river and
spare no effort – all to meet
someone's need. We wrap
our high quality products
in high quality service.



TEAMWORK

Together, we can run faster, reach higher and achieve more than any one of us can alone. We relish opportunities to collaborate because it's invigorating, enlightening and powerful. When we join forces and plow through boundaries, we move mountains.

VALUES

Compliance with the Code and Mylan Policies





e all have the responsibility to ensure that Mylan abides by the law in every country where we do business. Compliance with this Code of Business Conduct and Ethics (the "code"), and applicable law by all Mylan directors, officers and employees is mandatory and is a condition of retention, employment or continued engagement as a contractor or agent. Mylan, at its sole discretion, may take disciplinary action, up to and including termination of employment, against anyone for violating the code, applicable law or company policy. The code is not, and shall not be construed as, a contract of employment or any other assurance of continued employment. Mylan reserves the right to amend or replace the code by action of the Mylan N.V. Board of Directors at any time, without prior notice. The code is administered by the OGC.

Every Mylan employee must periodically certify that he or she has read the code and that he or she, to the best of his or her knowledge and belief, understands, has complied with and will continue to comply with the code, applicable law and company policy. The OGC will provide the procedure for such certification. If you have any issue with making the certification required above, contact your local or regional compliance officer, or the OGC.

Mylan has created a repository for currently effective company policies, called "Policies Central." You can access Policies Central via our Intranet, MIKE.

Reporting Potential Violations

ylan provides several options for you to submit concerns to the OGC: either online or via telephone, mail or email. To find the web reporting portal, local hotline phone numbers or email reporting options, go to the Compliance functional space on MIKE, or you can also find this information either on Mylan.com or a compliance poster in your work location. Online reporting is available through our functional space on MIKE. Mylan's confidential "Compliance Line" is accessible 24 hours a day, seven days a week, and you can make a report anonymously, if you choose and where permitted by law.

You are not required to identify yourself when making a report; however, doing so will enable us to ask additional questions if needed to assist with an investigation. We treat all reports with the same level of seriousness, regardless of whether you identify yourself. In certain jurisdictions, anonymous reports cannot be accepted by telephone or online portal; if this is the case in your location you will be so advised and you should pursue a different method of reporting.

All reports received will be reviewed and investigated, as appropriate, under Mylan's Policy on Reporting and Investigating Compliance-Related Matters and the investigation process detailed therein.



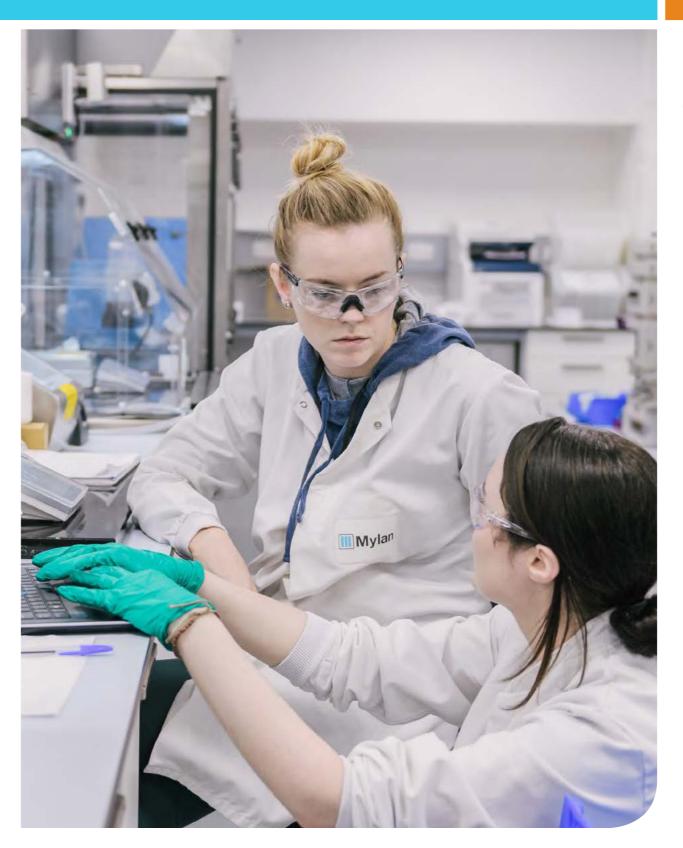
If you believe that your conduct or that of any other person has or may have violated the code, applicable law or company policy, you should report the matter to your immediate supervisor, Human Relations business partner, the Mylan Legal department or the OGC.



No Retaliation

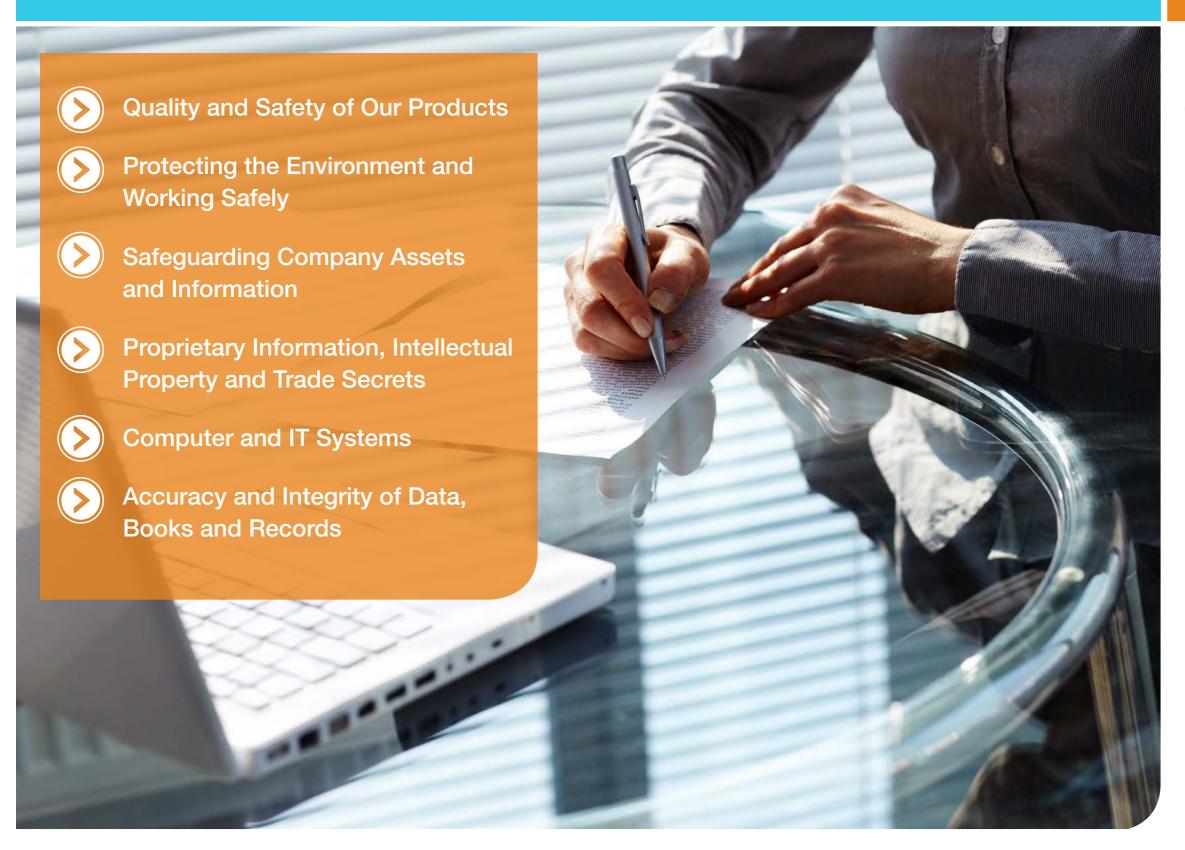
etaliation against any company personnel who reports a compliance-related matter in good faith pursuant to Mylan's Policy on Reporting and Investigating Compliance-Related Matters is strictly prohibited. If you believe you have been, or are being, subjected to retaliation for reporting a matter in good faith, contact the OGC.

All reports of compliance-related matters must be made in good faith and be truthful to the best of the reporting party's knowledge, information and belief concerning the factual matters they report. Making a false report is prohibited.





OPERATIONAL COMPLIANCE





Quality and Safety of Our Products

All Mylan employees and agents are responsible for reporting adverse events for Mylan products to the Product Safety and Risk Management department within 24 hours or the next business day from the time you learned of the event.







rom its founding, Mylan has been and remains committed to the highest standards of product quality and safety.

Our careful attention to product quality has a direct and substantial effect on our reputation and performance, and allows us to accomplish our mission to provide 7 billion people access to high quality medicine. Our customers seek our products because they trust that every product we make will be of the highest quality.

As a pharmaceutical manufacturer, we are governed by current good manufacturing practices, good laboratory practices, and other similar requirements for making and storing our products. Following these requirements

strictly ensures that we continue to deliver high quality medicines, and retain our strong reputation for quality. Any concerns about product quality must be reported as soon as possible to Quality Assurance so they can be quickly and appropriately investigated, addressed and resolved. Additionally, all Mylan employees and agents are responsible for reporting adverse events for Mylan products to the Product Safety and Risk Management department within 24 hours or the next business day from the time you learned of the event. An adverse event is any undesirable or unexpected experience following administration of a medicine. If you have questions or would like to report an adverse event, visit the global product safety site for further contact information.

Protecting the Environment and Working Safely

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ylan strives to protect the environment and the health and safety of our personnel, and of the communities in which we operate. Mylan's Environmental Health and Safety (EH&S) team is responsible for setting our standards and supporting our sites and businesses.

All Mylan personnel are expected to take responsibility for EH&S compliance. To do your part, you must:

- > Know and comply with all applicable EH&S policies and procedures:
- > recognize potential threats to the environment, and to personal health and safety;
- > help improve EH&S performance; and
- > report concerns about potential non-compliance to your supervisor, to your local EH&S team or Compliance.

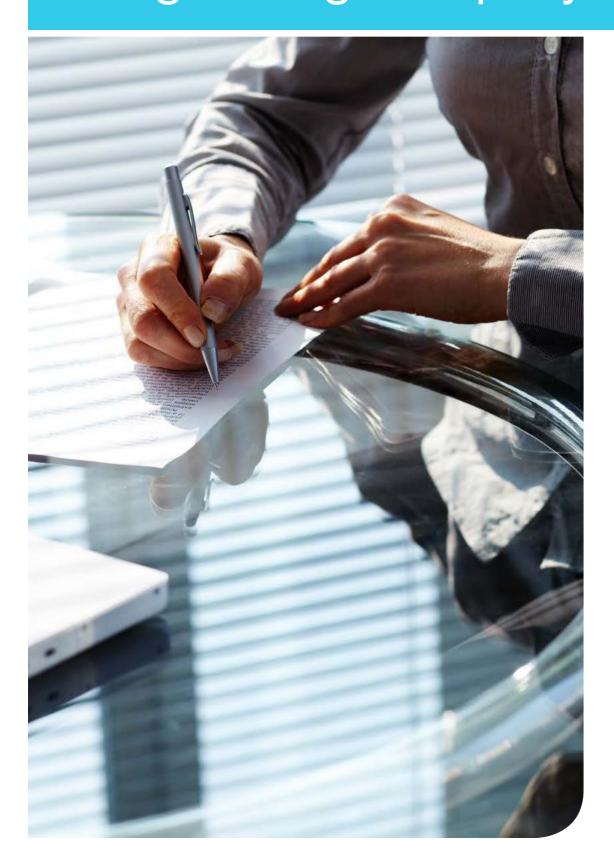


We all must familiarize ourselves with and follow security procedures, and never interfere with, or assist or encourage others to interfere with or defeat, the company's security measures.

Mylan also prohibits violence in the workplace including injuring, or threatening to injure, another person physically or intentionally damaging, or threatening to damage, property of the company or another person.

Mylan prohibits the possession of firearms or other weapons at Mylan sites, except as may be specifically authorized for security purposes by the global chief administrative officer and global general counsel.

Safeguarding Company Assets and Information





ylan assets include both physical assets, such as production equipment, tools, computers, facilities, as well as knowledge-based assets, such as trade secrets, intellectual property and other proprietary information.

Our ability to meet business objectives may be adversely affected by the loss, theft, misuse or damage of company assets. We are responsible for the appropriate use and protection of assets provided to us in the course of our work.

Mylan property must not be used for personal benefit, sold, loaned, given away or otherwise disposed of, regardless of its condition or value, without proper authorization. Mylan property and assets must be used only for Mylan business purposes.

Proprietary Information, Intellectual Property and Trade Secrets



e are responsible for protecting Mylan's proprietary information, intellectual property and trade secrets, and those that are entrusted to Mylan by others.

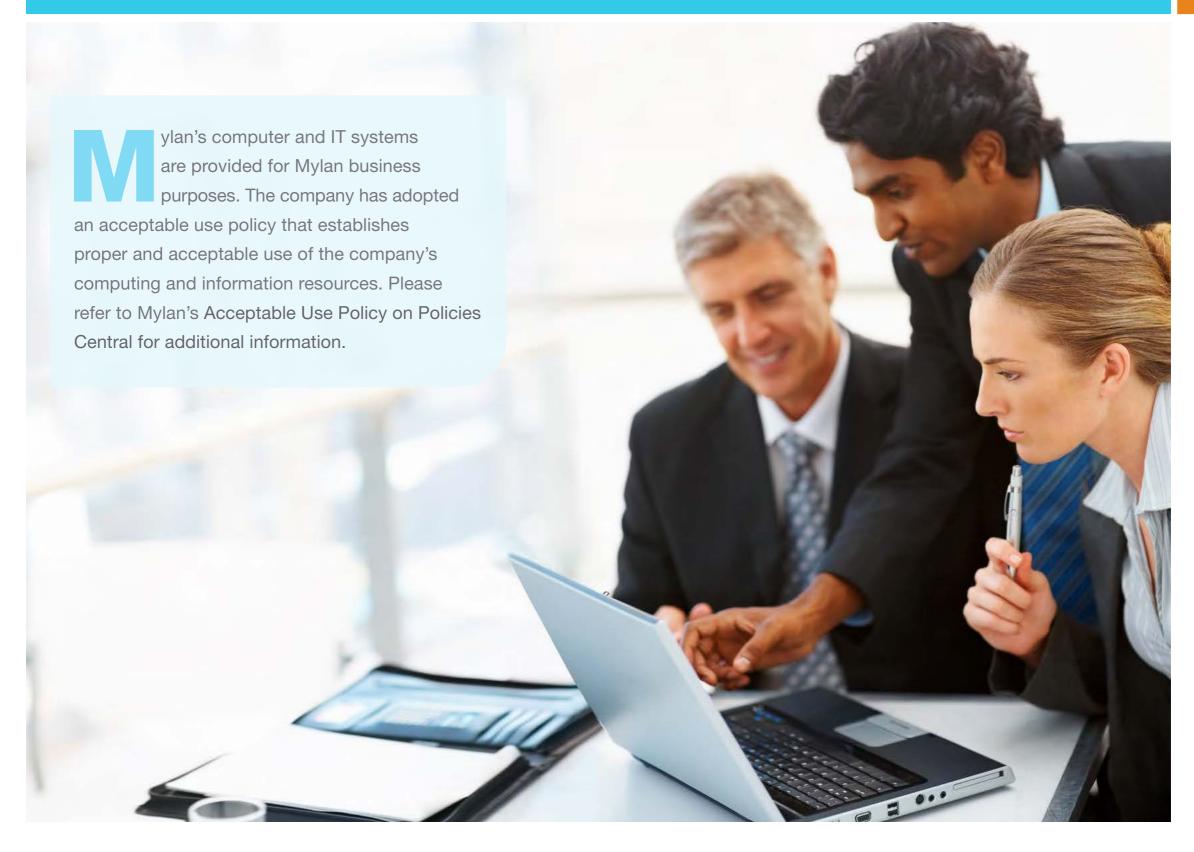
Proprietary information is information that we learn, receive or develop as part of our work and which is not otherwise publicly available. Such information may include, but is not limited to, strategic plans, financial plans, business plans, commercial and regulatory strategies, legal strategies, research and development, sales, marketing, manufacturing and financial information. Other valuable, confidential information may include, but is not limited to, information concerning our pipeline, products, facilities, customers and workforce. Such information is a valuable business asset that must be protected because its unauthorized use or disclosure could destroy its value to the company and give others an unfair competitive advantage.

Proprietary information, intellectual property and trade secrets must not be used or disclosed without authorization, consistent with applicable law, and we must take affirmative steps to ensure that such information is safeguarded, including but not limited to, execution by the recipient of a written confidentiality agreement approved by the Legal department prior to disclosure. We must take particular care with respect to meetings of industry associations and other situations in which we come into contact with representatives of our competitors.



IF YOU QUESTION WHETHER MYLAN INFORMATION IS PROPRIETARY, INTELLECTUAL PROPERTY OR TRADE SECRET, TREAT IT AS SUCH.

Computer and IT Systems





Office of Global

Compliance



Accuracy and Integrity of Data, Books and Records

All Mylan personnel must comply with all established internal controls at all times. We must accurately enter all assets, liabilities, revenues and expenses of mylan in the company's regular books, records and other standard financial documents.

e are all required to record and report all data and information accurately and honestly. This applies to every business record or document that you prepare or contribute to as part of a team. Such documents include, but are not limited to:

- > Data from tests of products or ingredients, materials or components and related reports;
- > research, manufacturing and quality records;
- > accounting entries and any other information which will or may become part of a financial statement or related filing;
- > purchase orders, invoices and contracts;
- > any mandatory reporting, such as drug price reporting or transparency reporting; and
- > expense reports.

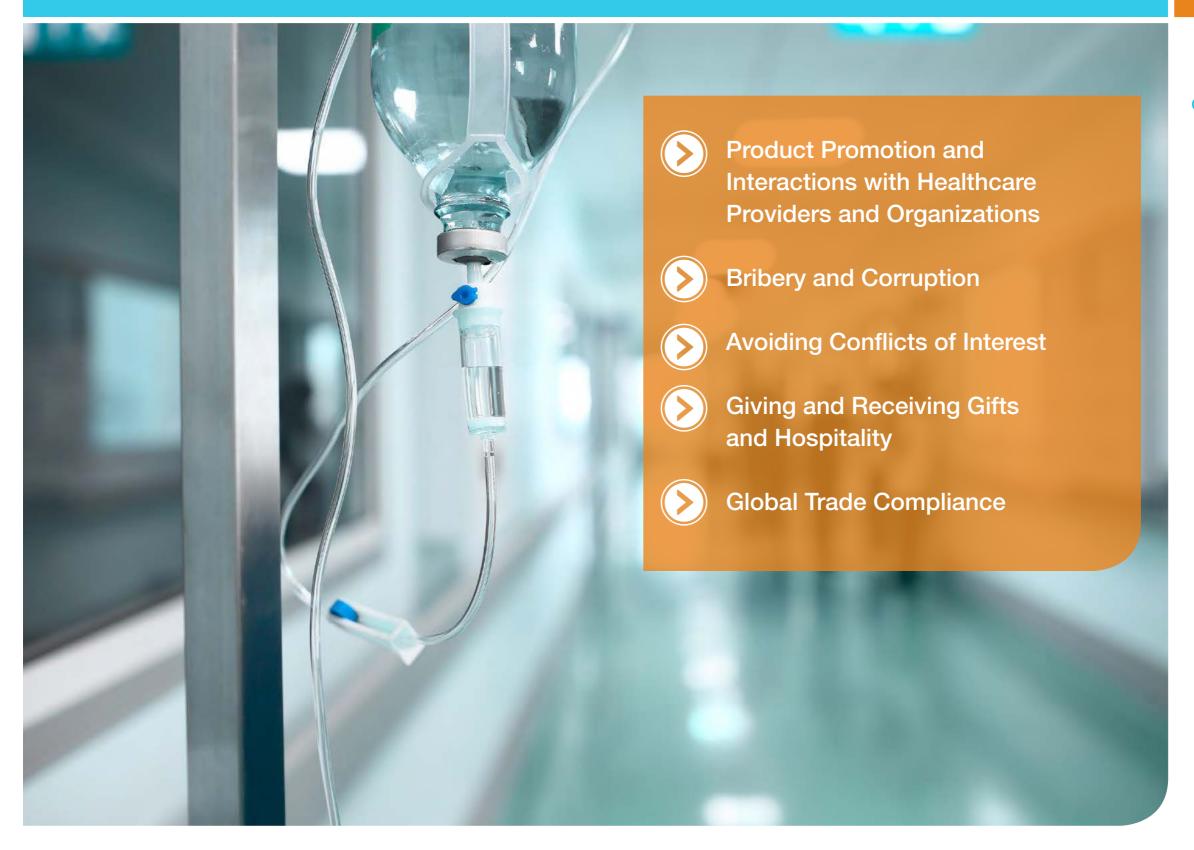
Many laws prohibit making false statements or false claims to government officials and entities. There potentially can be severe civil and criminal penalties, both for you personally and for Mylan, if you violate these laws.

If you prepare or contribute to any business record, or represent or certify to the accuracy of the information contained in such records, you must be diligent in assuring their accuracy and complete integrity.

All Mylan personnel must comply with all established internal controls at all times. We must accurately enter all assets, liabilities, revenues and expenses of Mylan in the company's regular books, records and other standard financial documents. These books, records and documents also must accurately reflect and properly describe the transactions they record. For example:

- > No undisclosed or unrecorded fund, asset, liability or account of Mylan may be established for any purpose;
- > no false or artificial entries may be made in the books, records or accounts of Mylan for any reason, and we must not engage in any arrangement that results in erroneous entries; and
- > no payment on behalf of Mylan may be approved or made with the intention or understanding that any part of it is to be used for any purpose other than that which is described by the supporting documents and in the legitimate interests of Mylan.

FRAUD AND CORRUPTION





Office of Global

Compliance



Product Promotion and Interactions with Healthcare Providers and Organizations

Strict regulations govern not only our promotional activities but also our educational and commercial relationships with healthcare providers and organizations, including our interactions with physicians, nurses, pharmacists and others who administer, prescribe, purchase or recommend prescription medicines, and organizations that employ healthcare providers or otherwise provide healthcare services.

Il interactions with healthcare providers and organizations must be guided by applicable laws, regulations and Mylan policies found on Policies Central.

The following general principles govern Mylan's interactions with healthcare providers and organizations everywhere in the world:

- > We will not use any unlawful inducement to sell or to arrange for the recommendation or prescribing of our products.
- > We believe that enduring customer relationships are based on integrity and trust. We seek to gain advantage over our competitors through superior products, quality, manufacturing and service, but never through improper business practices.
- > Mylan's relationships with healthcare professionals ("HCPs") and healthcare organizations ("HCOs") are intended to benefit patient care and enhance the practice of medicine. Interactions should not tempt HCPs to place their own personal interests

- above those of the organizations they represent or the patients who will use or need the company's products.
- > Mylan will not, directly or indirectly, offer or solicit any improper payment, contribution or other transfer of value for the purpose of obtaining, giving or keeping business.

Promotional activities and materials must always comply with all applicable laws, regulations and codes, and our own marketing and advertising review policies, and must be truthful, accurate, not misleading, consistent with approved product labeling and properly substantiated. Promotional activities and materials must never involve promotion of drugs for off-label indications, uses, doses or populations.

All personnel involved in product marketing or promotion must familiarize themselves with the applicable standards for interaction with healthcare providers and all related policies and procedures governing the creation, review, approval and use of promotional materials. Use of unapproved promotional materials is prohibited.

ALL INTERACTIONS WITH HEALTHCARE PROVIDERS AND ORGANIZATIONS MUST BE GUIDED BY APPLICABLE LAWS, REGULATIONS AND MYLAN POLICIES.

Bribery and Corruption



MYLAN
PROHIBITS
BRIBERY
IN ALL
FORMS.

he company has also adopted a global Anti-Corruption Policy, and other policies and procedures to prohibit, prevent, deter, detect bribery and to punish acts of bribery if it does occur. All company personnel share responsibility for adhering to Mylan's anti-corruption policies and procedures. All company personnel, especially those in leadership or management positions, must demonstrate and communicate the company's absolute commitment to these principles.

Company personnel must ensure that payments or benefits offered or given in connection with customary business hospitality, promotional expenses and other bona fide business expenditures are never used to improperly influence the recipient of such payment or benefit; that the recipient is permitted under the law and rules or policies of his or her employer to accept such benefits;

and that any such payments, benefits or expenses are reasonable, customary, not extravagant or excessive, and properly and accurately described in all company records.

Mylan also prohibits any form of commercial bribery. For example, Mylan personnel must not provide, directly or indirectly, anything of value to an agent or employee of a customer, vendor or service provider with the intent of influencing that person's decision in an effort to secure that third party's business.

Violations of the U.S. Foreign Corrupt Practices

Act (the "FCPA"), the U.K. Bribery Act and local anti-bribery laws
may have extremely serious legal consequences for the company
and any individual involved. These consequences can include
imprisonment, potentially unlimited fines, exclusion from industry
and loss of employment.

Please refer to Mylan's Anti-Corruption Policy on Policies Central for additional information.

If you have any questions regarding this prohibition or any particular payment, contact your local or regional compliance officer, the OGC or the Legal department.



Avoiding Conflicts of Interest



All company personnel must, where possible, avoid situations in which an actual or potential conflict of interest may exist.



ylan personnel have an obligation in all business transactions to place the interests of the company ahead of any personal interests. Mylan employees must avoid personal interests that conflict with the interests of Mylan, or that might influence or appear to influence their judgment or actions in performing their duties. Therefore, all company personnel must, where possible, avoid situations in which an actual or potential conflict of interest may exist. Furthermore, Mylan personnel shall promptly and fully disclose any actual or potential conflicts of interest that arise to their local or regional compliance officer, or to the OGC.

Please refer to Mylan's Conflict of Interest Policy on Policies Central for additional information and instructions on how to appropriately disclose and resolve an actual or potential conflict of interest. Situations that may give rise to a prohibited conflict of interest and for which employees should seek guidance from the OGC include, but are not limited to:

- > Personal or family business arrangements with Mylan;
- > diverting corporate opportunities;
- > financial interests in competitors, vendors, suppliers or customers;
- > outside employment with a competitor, supplier or vendor, or that otherwise conflicts with the employee's performance of his or her job duties with Mylan;
- > family member(s) working with a competitor, customer, supplier or vendor; and
- > service with outside organizations, particularly governmental positions.

Giving and Receiving Gifts and Hospitality

Il business decisions that you make on behalf of Mylan must be based on uncompromised, ethical judgment and be independent of actual or anticipated personal gain. Business decisions include, but are not limited to, procurement of materials, supplies and services, as well as sales terms and discounting decisions. All such decisions must reflect the best interest of Mylan.

Mylan prohibits providing anything of value to a person with the intent of influencing that person's recommendations or purchases of healthcare products or services.

No gifts, meals, entertainment or anything else of value may be directly or indirectly given by Mylan personnel to anyone in violation of applicable law.

Providing gifts, meals or entertainment to healthcare providers is generally discouraged and, where allowed, must comply with applicable law and Mylan policies.

Company personnel may not solicit or request gifts, entertainment or other business courtesies from people or organizations doing business with Mylan.



All business decisions that you make on behalf of Mylan must be based on uncompromised, ethical judgment and be independent of actual or anticipated personal gain.

Occasional, unsolicited gifts and business courtesies, such as meals and entertainment, are permissible if they are customary and common business courtesy; modest, based on local standards; and not excessive in value. In addition, local policies may require advance approval before accepting gifts or other business courtesies; ask your compliance officer and check Policies Central for specific guidance. No gifts or entertainment may be accepted that would likely or potentially result in an expectation or belief of the creation of a personal obligation, or that could be perceived as influencing your judgment or decision.

Mylan personnel who are in a position to influence or make procurement decisions must be especially cautious about the receipt of gifts that might affect, or appear to affect, their procurement decisions.



Global Trade Compliance





e are all responsible for complying with trade and export control laws, which are complex and may change quickly as governments adjust to new political and security issues. Violations of trade and export control laws and sanctions can lead to significant fines and penalties, both for Mylan and for any individuals involved.

Many countries have trade control laws that govern the import, export or transfer of certain controlled products, software and technology, as well as the performance of certain controlled services. In addition many trade control laws restrict Mylan's transactions and business relations with certain countries, entities, organizations or individuals.

Some countries in which Mylan does business have in place restrictive trade practices or boycotts against other countries or groups. Mylan may not engage in agreements, provide any information or take any action that would support such restrictive trade practices or boycotts, if doing so would violate U.S. laws.

Company personnel who encounter any of the above subjects in the course of their work for Mylan must be aware of Mylan's Global Import/Export Trade and Customs Policy, found on Policies Central, and related procedures. In particular, all activities involving certain sanctioned countries must be reviewed by the OGC to ensure compliance with trade control laws. Any questions about compliance with these laws, or suspected violations, should be directed to the OGC or the Legal department.

FAIR COMPETITION, PRICING AND ANTI-TRUST

Office of Global Compliance





Fair Competition





ylan is committed to complying with applicable antitrust and fair competition laws. To uphold this commitment, Mylan personnel shall at all times comply with applicable fair competition and antitrust laws of the countries in which we do business.

Antitrust and fair competition laws and regulations around the world are intended to preserve fair, honest and vigorous competition in the marketplace. Although antitrust and fair competition laws vary from place to place, and some practices that may be allowed in certain places may also be forbidden in others, generally, these laws prohibit (1) agreements between competitors to improperly monopolize or divide markets, control prices, limit production, or otherwise unreasonably restrain trade or engage in unfair business practices, (2) unilateral conduct that constitutes monopolization, attempted monopolization and abuse of a dominant position in any market, and (3) discriminatory pricing.

Due to the complex nature of antitrust and fair competition laws and regulations and the potential civil and criminal consequences of violating them, company personnel are required to consult with the Legal department, their local or regional compliance officer, or the OGC if they encounter a situation that may implicate any of these laws or regulations.

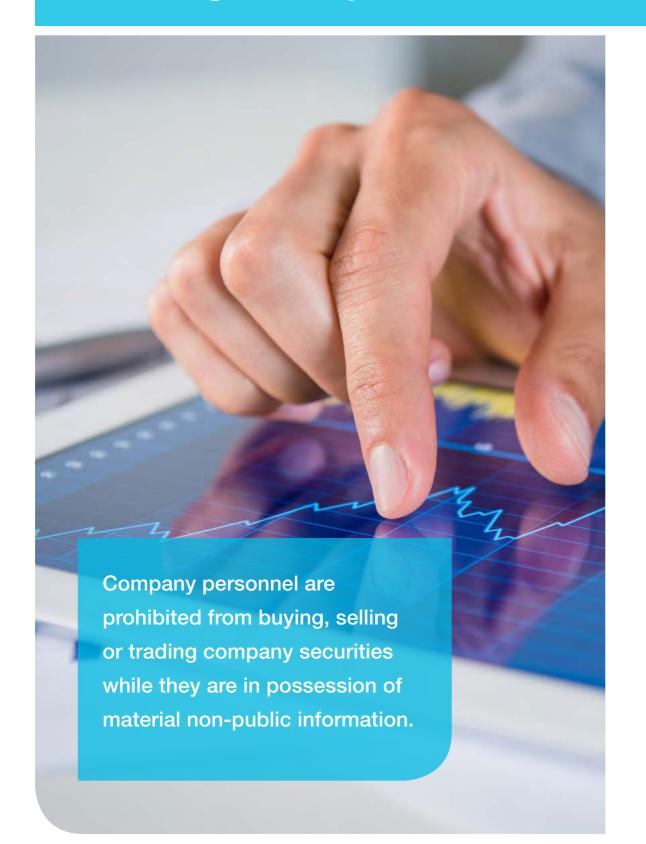
We will not attempt to improperly obtain or use a competitor's proprietary information. This includes information pertaining to a competitor's prices, bids or proposals in circumstances where there is reason to believe that the release of such information would be illegal or unauthorized.

CORPORATE AND SECURITIES LAWS





Trading in Mylan Securities



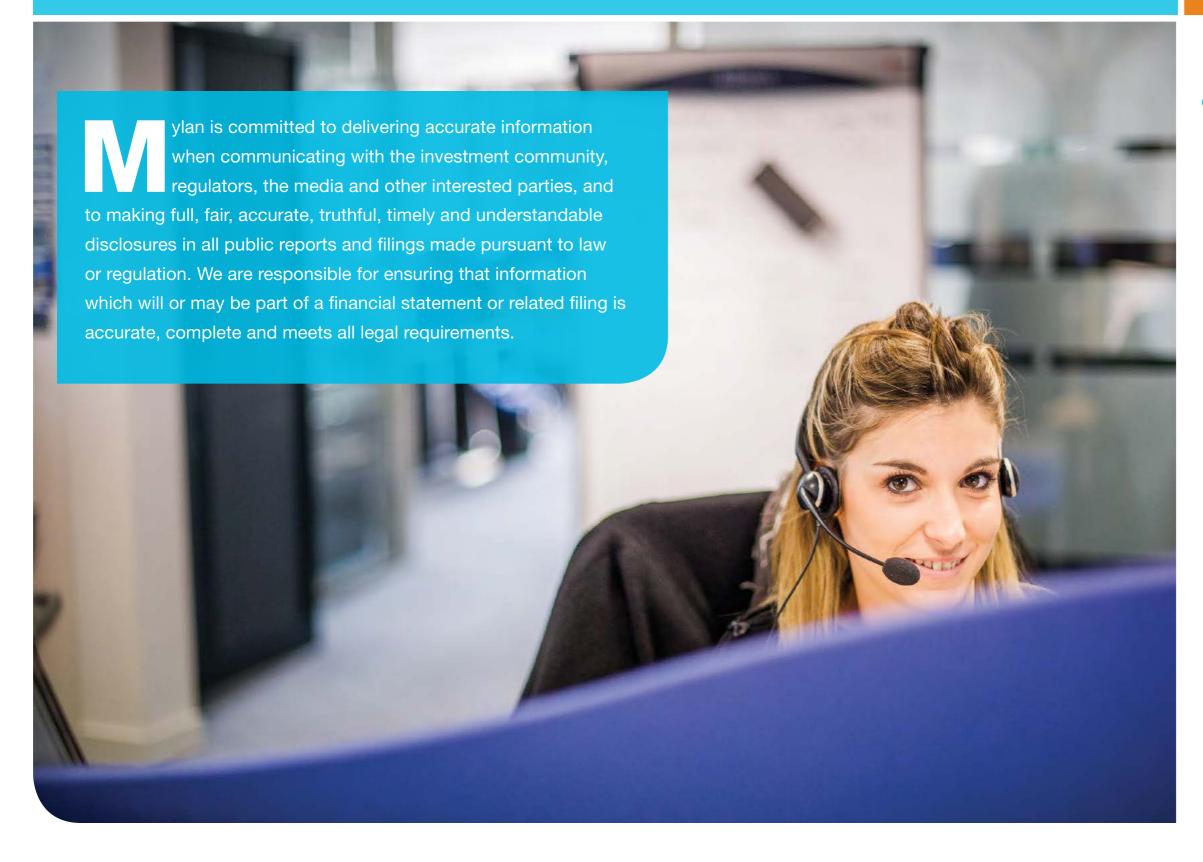


ompany personnel are prohibited from buying, selling or trading company securities while they are in possession of material non-public information. It is irrelevant whether or not such information is the basis for your transaction; your possession of it while making the transaction is sufficient for you to be in violation of this code, company policy, and potentially subject to civil and criminal sanctions.

Company personnel are also prohibited from causing or recommending that others – including but not limited to family members – buy, sell, hold or trade company securities if they possess material non-public information.

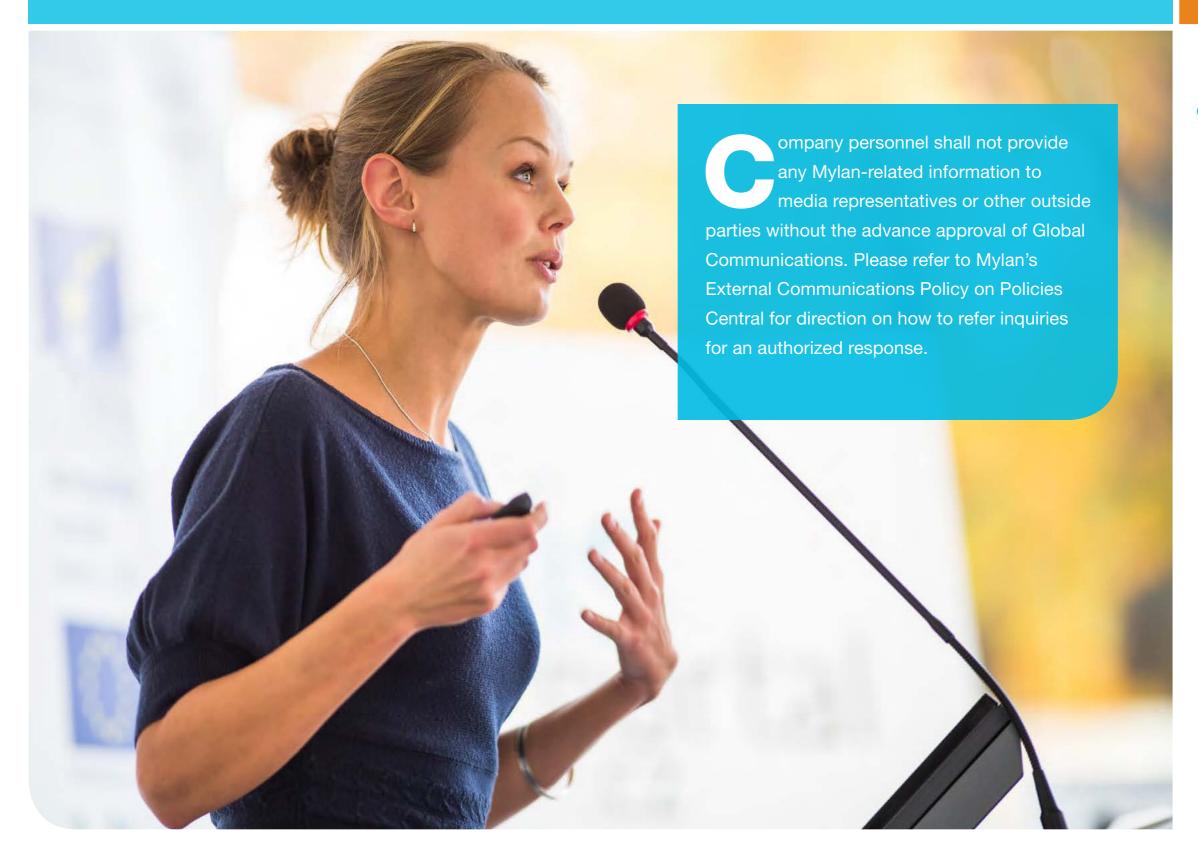
Please refer to Mylan's Policy on Trading Company Securities and Insider Trading Policy on Policies Central for additional information.

Public Disclosures



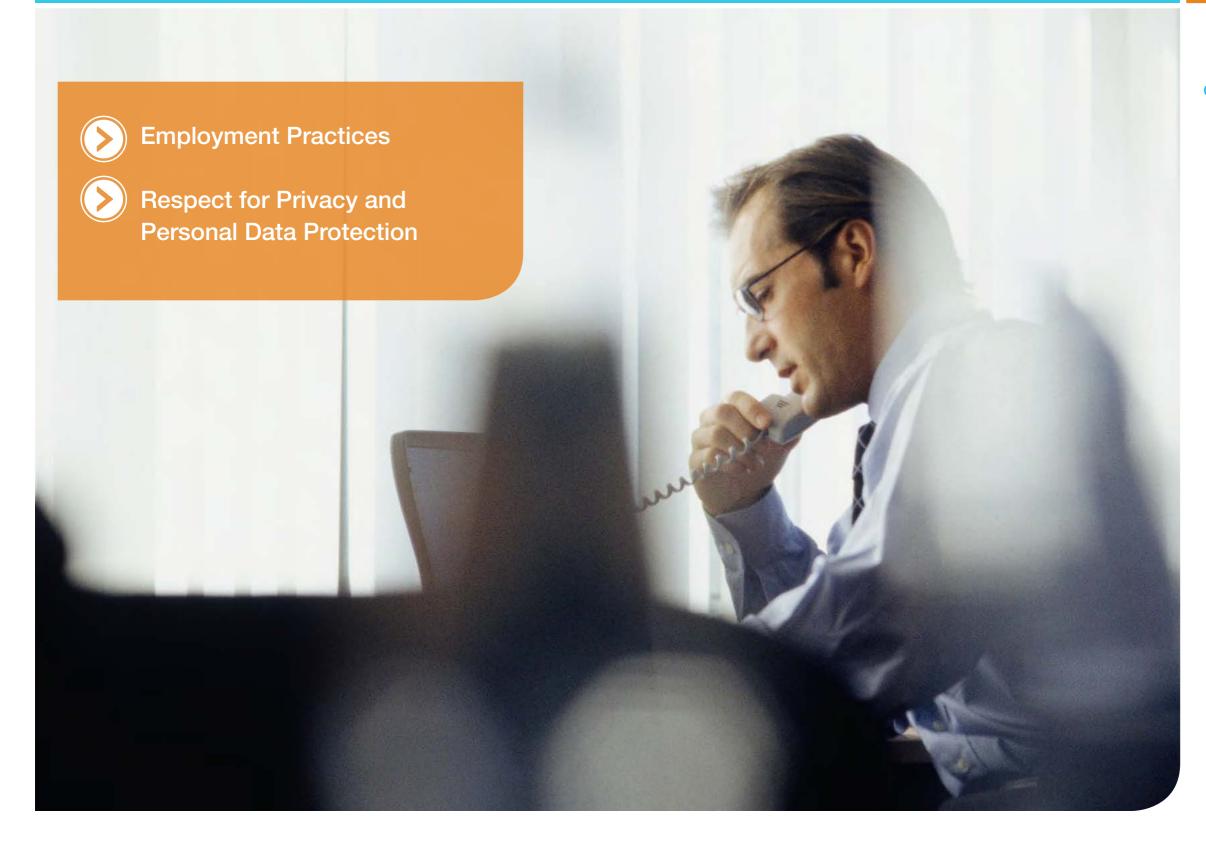


External Communications





FAIR EMPLOYMENT PRACTICES

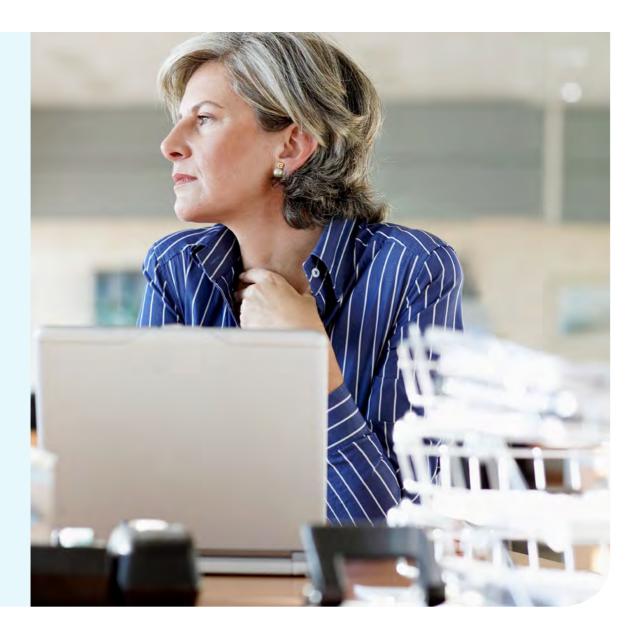




Employment Practices



ylan strives to create a work environment that is productive, healthy, safe and free from unlawful discrimination, harassment and retaliation. Prohibited sexual harassment includes, but is not limited to, unwelcome sexual advances, propositions, requests or demands for sexual favors, and other verbal, visual or physical conduct of a sexual nature. Harassment based on other personal characteristics or traits, such as a person's age, race, color, religion, sex, sexual orientation, national origin, citizenship, marital status, mental or physical disability or handicap, military service or veteran status, or any other characteristic protected by law, also is prohibited. Mylan is an equal opportunity employer as a matter of law, ethics and good business practice.



Respect for Privacy and Personal Data Protection





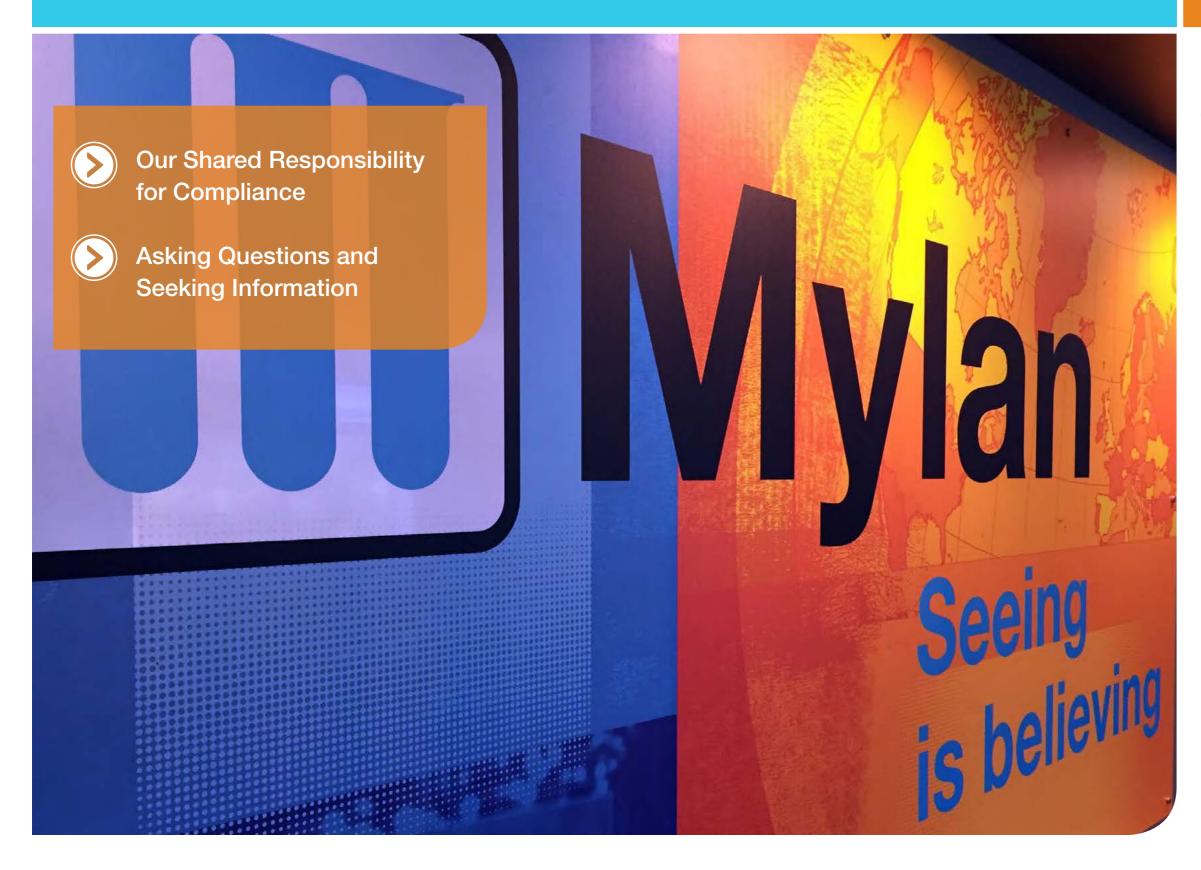
Il of our employees, and outside parties with whom Mylan has dealings (patients enrolled in clinical trials, medical practitioners, contractors, etc.) are entitled to their privacy. Mylan is committed to protecting their personal data.

"Personal data" means any information that can be used to identify an individual, whether directly or indirectly (e.g., name, date of birth, photograph, address, email address, social security or government identifying number).

Personal data protection gives individuals whose data are held the right to control the collection, processing, use, disclosure and storage of data relating to them. These data must be used fairly and for a specific, clear and legitimate purpose, and must only be retained for as long as is necessary for the purpose for which they are processed.

Because data protection and privacy legislation varies from country to country, and because Mylan operates across many locations, Mylan has adopted an Employee Data Protection Policy and Fair Processing Notice, applicable to all our employees around the world. Mylan also has entered into intercompany agreements to ensure appropriate collection, storage, transfer and use of personal data.

CONCLUSION





Shared Responsibility



ACCOMPLISH ITS BOLD MISSION IF WE ALL UNDERSTAND AND EMBRACE OUR SHARED VALUES, ESPECIALLY OUR COMMITMENT TO DOING BUSINESS WITH INTEGRITY AND IN COMPLIANCE WITH ALL APPLICABLE LAWS.

s employees of Mylan, we all are responsible, individually and together, to ensure good compliance, and to understand and follow the principles set forth in this code.

To accomplish this, we all must:

- > Be familiar with applicable laws and Mylan company policies, and follow them at all times;
- > seek guidance when we have questions;
- > take responsibility and hold each other accountable; and
- > raise concerns, ask questions and take action against improper conduct by reporting it.

Executives and managers also must:

- > Maintain a work environment that encourages open communication;
- > ensure that all personnel under your supervision complete assigned compliance training;
- > be familiar with the resources available to assist in the resolution of legal and ethical questions and concerns; and
- > enhance our culture of compliance by encouraging ethical behavior, setting a strong tone of support for compliance and leading by example.

IN SHORT, WE "DO WHAT'S RIGHT, NOT WHAT'S EASY."



Asking Questions and Seeking Information

