

Global Anti-Corruption Policy

Mylan's policy is to comply with the United States Foreign Corrupt Practices Act (the "FCPA"), the United Kingdom's Bribery Act of 2010 (the "UKBA"), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and all other national and local anti-corruption laws in force wherever Mylan and its Company Personnel do business. Mylan is committed to implementing and enforcing effective compliance systems to prevent and detect bribery and corruption, and to taking prompt and effective remedial action as may be required.

Company Personnel must not engage in acts of bribery or corruption under any circumstance. Company Personnel are prohibited from offering, promising, making, accepting, soliciting, authorizing or providing, directly, or indirectly through third parties, any payments, gifts, or anything of value to any person for the purpose of corruptly or improperly influencing or rewarding any action, inaction, or decision by such person, or for the purpose of obtaining or retaining business or securing an improper business advantage. This prohibition extends to bribery of Government Officials, both foreign and domestic, and to bribery of individuals or organizations operating entirely in the private sector. Mylan also prohibits facilitation payments, which are payments, even in nominal amounts, made to government officials to expedite or secure routine, non-discretionary actions, such as processing visas, licenses or permits. This prohibition does not include official application fees or assessments charged by and payable to an agency or bureau.

It is also our policy to keep accurate accounting books and records, and to maintain a system of internal accounting controls to ensure that all transactions are properly authorized.

All Company Personnel are expected to comply with all applicable laws, including anti-corruption and bribery laws around the world. Bribery and corruption of any form will not be tolerated by Mylan. All Company Personnel have the personal responsibility to understand and abide by this Policy, and all related policies and procedures that form a part of Mylan's anti-corruption compliance program insofar as they relate to Company Personnel's duties. All Company Personnel, especially those in leadership or management positions, must demonstrate and communicate Mylan's absolute commitment to these principles. All Company Personnel, including agents of the company, who are assigned Mylan's anti-corruption training must complete the training within the time frame allowed. Failure to comply with the terms of this policy may subject the individual to disciplinary action, up to and including termination of employment, and/or legal action against the individual as permitted by law.