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# Code of Conduct

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For an interactive experience with call outs and scenarios further illustrating the information contained in this Code of Conduct, please visit our [interactive Code of Conduct](#).



# A Letter From Our CEO

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Indivior Team,

At Indivior, our brand is built on the foundation of passionate people, expertise, and our ability to bring life-transforming treatment to patients. We are determined to drive change in the fight against the global opioid crisis. This vulnerable patient population requires advocacy and support from many stakeholders along their recovery journey. Our commitment to excellence and dedication to our vision enables us to play an important role in helping people reclaim their lives and build a brighter future.

With leadership comes responsibility. The Indivior brand must be synonymous with trustworthiness and that comes from operating with unwavering integrity, ethics, and quality in all we do.

We place value on our team's ability to successfully execute our mission. Our Guiding Principles are the bedrock of our culture and serve as our "true north" as we strive to earn the public's trust.

Aligned with our Guiding Principles, our Indivior Code of Conduct provides us with the standards for how we operate responsibly and consistently. It helps us adhere to the spirit and letter of industry codes, laws, and regulations in every country we operate. Our Code of Conduct is further reinforced by our written standards and to protect our most important brand - Indivior.

Our Code of Conduct, Guiding Principles and written standards foster a culture of integrity and trust. We take pride in our commitment to positively impact human health and address the global opioid crisis. As a foundational element of our Indivior Global Integrity & Compliance Program, our Indivior Code of Conduct is supported and endorsed by our Executive Committee and Board of Directors.

Thank you for your unwavering focus on our vision, embodying our Guiding Principles, and upholding our Code of Conduct in everything you do. Your dedication enables us to make a difference in lives of people living with OUD and the communities that we serve. It is our individual and collective responsibility to be outstanding stewards of our most important brand, Indivior.

Joe Ciaffoni

Chief Executive Officer

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**“It is our individual and collective responsibility to be outstanding stewards of our most important brand, Indivior.”**

# Our Code of Conduct

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Indivior is committed to responsible corporate behavior; this includes high standards of compliance with applicable laws, regulations, and rules, and maintaining integrity in our relationships with everyone with whom we interact.

## What is the purpose of the Code of Conduct?

The purpose of this Code of Conduct (the “Code”) is to set out the operating standards of Indivior Pharmaceuticals, Inc. and its subsidiaries (together, “Indivior”), its Board of Directors (the “Board”) and Indivior full- and part-time employees and contingent workers (“Workforce”).

Indivior is committed to conducting its business with high standards of integrity and ethics, and in full compliance with relevant laws, regulations, and industry codes in the regions in which we operate. This Code is a foundational document to help us achieve these outcomes. This Code is designed to prevent wrongdoing and promote the following business practices:

- Honest and ethical conduct, including ethical handling of actual or apparent conflicts of interest;
- Complete, accurate and timely disclosure of information in reports and documents filed with the Securities and Exchange Commission (the “SEC”) and other public communications;
- Compliance with governmental laws, rules, and regulations;
- Prompt internal reporting of known or potential violations of this Code to the appropriate personnel identified in this Code; and
- Accountability for compliance with this Code.

## To whom does the Code apply?

The Code applies to the Board and Workforce members. Others may be contractually obligated to comply with the Code (e.g., student interns and consultants). The [Third-Party Code of Conduct](#) applies to external business partners.



## Facing an ethical situation?

Ask yourself:

- Is the conduct consistent with our Code, Indivior policy, procedures and the law?
- Is the conduct aligned with our Guiding Principles?
- Would this conduct build or enhance trust in Indivior and our reputation?
- Would I be proud to share my conduct with family and friends?
- If the answer to any question is “no” or “I’m not sure,” STOP and seek guidance before proceeding.



# Compliance With Legal and Regulatory Requirements

Indivior conducts business in many countries around the world, and our customers, patients, and Workforce members reside in many different countries. Consequently, our operations are subject to national, local, and multinational laws and regulations. Some laws extend beyond the borders of an individual country. It is important to understand how these laws may apply to our operations. Various governments impose legal requirements that restrict companies like Indivior from doing business with identified individuals or entities.

Trade sanctions are an example of cross-border requirements. Indivior's [Global Sanctions Policy](#) informs our compliance with various trade sanctioning regimes (e.g., US Office of Foreign Assets Control, Council of the European Union). We require that any Board or Workforce member who becomes aware that an Indivior third-party vendor, including related individuals, or customer may be subject to sanctions, to notify Legal immediately.

In addition to this Code, the Board and our Workforce members are expected to comply with all applicable Indivior requirements (e.g., Written Standards) and national, local, and multinational laws and regulations. Where stricter requirements apply (e.g., local laws, industry codes, Indivior Written Standards), the stricter requirements always take precedence and must be adhered to in all circumstances. Contact Integrity & Compliance ([compliance@indivior.com](mailto:compliance@indivior.com)) with questions about any unresolved conflicts between this Code and external requirements.

This Code does not cover every law or situation our Board or Workforce may encounter. Rather, it serves as our compass for acting with accountability, knowledge, good intent, and with integrity at all times. Amidst any uncertainty, seek guidance.

# Our Responsibilities

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## Workforce Responsibilities

We expect and rely on our Board and Workforce members to uphold and enforce this Code, our Guiding Principles, and our related Written Standards. If you believe there is a suspected or potential violation of the Code, our Written Standards, local, national, and multinational laws and regulations, or an activity that could lead to a violation, it is your responsibility to “Speak Up.”

Indivior’s Speak Up program provides a number of different channels for you to raise questions or concerns to Human Resources, Integrity & Compliance, Legal, your supervisor, a member of senior management, or [EthicsLine](#), a telephone and web-based reporting resource available 24 hours a day, seven (7) days a week. [EthicsLine](#) is hosted by NAVEX, a third-party vendor.

A “concern” is defined by the person expressing it. With regard to our Code, it most often refers to a suspected or potential violation of the Code, any law, regulation, or Indivior Written Standard applicable to Indivior’s business and operations.

Indivior will not retaliate against any individual who reports a concern in good faith or participates in Indivior’s investigation of such a concern. Any Workforce member found to have retaliated against anyone for reporting in good faith or participating in an investigation will be disciplined according to Indivior Written Standards. All Workforce members have a responsibility to fully cooperate in an investigation.

Managers have an important responsibility to set an example and consistently act in accordance with, and coach others in line with, our Code and Written Standards. Managers must also take steps to help integrate our Global Integrity & Compliance Program throughout Indivior to learn, adjust, and prevent compliance issues in a timely and ongoing manner.



## Care Enough to Coach

*I have a concern I feel like I should report – a co-worker is doing something that I believe to be ethically wrong – but I’ve heard that my manager has made things difficult for co-workers who have raised issues. What should I do?*

Take action and speak up. It is everyone’s responsibility to report misconduct. Starting with your manager is often the best way to address concerns, but if you do not believe it is appropriate or do not feel comfortable doing so, talk to another member of management or contact any of the resources listed in the Code.

# Our Standards

## Relationships With Healthcare Professionals

The countries in which we operate restrict offering anything of value as an inducement to purchase, recommend, prescribe, prefer, or influence the purchase of pharmaceutical products. This includes providing items of value as a reward for past decisions favorable to Indivior. It is important to note that these requirements and our Written Standards address direct, indirect, implicit, and explicit actions.

As national governments are the largest payor for pharmaceuticals, healthcare laws and regulations are designed to protect the integrity of their respective healthcare programs.

All Workforce members who interact with healthcare professionals and patients must be familiar with and adhere to Indivior's Written Standards. Indivior's requirements have been designed to demonstrate our integrity and assist Workforce members in complying with these laws.

## Research and Development

*We seek to conduct research that produces objective and accurate data that progresses science.*

At Indivior, our research and development processes are robustly monitored and are conducted in line with applicable laws, regulations, and reporting requirements. We maintain appropriate informed consent procedures in connection with Indivior's research and development programs.

We are committed to following Good Laboratory Practices (GLP) and Good Clinical Practices (GCP), which among other responsibilities, seeks to protect research subjects. We also recognize our ethical and regulatory responsibility to demonstrate the ethical and humane treatment of animals involved in our research.

## Patient Safety

*Patient safety is a central focus of our research and customer engagements.*

Promoting and maintaining patient safety and the quality of our products is central to Indivior's culture and patient-focused business model. Indivior maintains a pharmacovigilance system to monitor the safety of the marketed and investigational products in a thorough manner and comply with laws and regulations relating to pharmacovigilance. This includes maintaining the required documents and training of our Workforce members and others required to follow our requirements.

Indivior is committed to capturing and reporting safety information associated with our products, in full compliance with laws and regulations globally.

Further, Indivior continues to work actively alongside regulatory authorities to combat counterfeiting. This includes a vigilant and active Risk Evaluation Mitigation Strategy (REMS) program for relevant products.

## Healthcare Professionals and Patients

We work to responsibly and ethically enable better patient outcomes.



## Care Enough to Coach

*Am I required to report an adverse event even if I don't believe it was caused by our drug?*

Yes. Any untoward medical occurrence in a patient or clinical trial subject administered or taking one of our products must be reported even if you don't believe it to have a causal relationship.

# Compliance With Our Policies

## Anti-Bribery and Anti-Corruption (ABAC)

*We stand against bribery and corruption around the world.*

Bribery is strictly prohibited. A bribe is a payment or benefit (including gifts) offered for the purposes of improperly influencing a decision or outcome. Bribery also encompasses requesting, agreeing to receive, or receiving a financial or other non-financial advantage, directly or indirectly, to influence improperly your views or actions. "Corruption" refers to fraud, the abuse of entrusted power or position for corporate or private gain (financial or non-financial).

Bribery is unethical and prohibited in all countries in which Indivior operates. The mere offer of a bribe could be illegal under some laws.

We expect our Workforce members to seek immediate guidance from their supervisor, Integrity & Compliance, or

Legal if they believe that they have knowledge of suspected or potential bribery or corruption.

## Conflicts of Interest

*We expect business decisions to be made objectively.*

A conflict of interest occurs when an individual's private interest (or the interest of a member of their family) interferes, or even appears to interfere, with the interests of the Indivior as a whole. A conflict of interest can arise when a Board or Workforce member (or a member of their family) takes actions or has interests that may make it difficult to perform their work for Indivior objectively and effectively. Conflicts of interest also arise when a Board or Workforce member (or a member of their family) receives improper personal benefits as a result of their position at Indivior.

If not addressed or managed, conflicts of interest may have damaging



## Care Enough to Coach

*I am traveling in a country and am told by the immigration official that I need to pay him to be allowed out of the country. What should I do?*

When faced with such a demand, you should explain Indivior's policy, ask to see the person's supervisor and say that you will pay when provided with an official receipt. In exceptional circumstances, in which a Workforce member is faced with a serious medical or safety emergency, the Workforce member must seek prior approval from the Legal Department to make a facilitation payment or, where it is impossible to seek prior approval, record the details of the facilitation payment in accordance with the procedure described in the Anti-Bribery and Corruption Policy.



## Care Enough to Coach

*My sister owns a company that's bidding on a contract with Indivior. I am not involved in the decision process, but if her company was selected, we would be working together on projects. Should I speak up about my relationship with her?*

Yes, you should. While it is good that you are not involved in the decision process, the fact that you will be working together could pose a potential conflict. Let your manager know about the situation, so that appropriate measures to address and resolve the issue can be taken.

# Compliance With Our Policies

consequences for the reputation of both individuals and Indivior. If you become aware of a suspected or potential conflict of interest involving you or another Workforce member, review our [Conflict of Interest Policy](#) and inform your supervisor immediately.

Suspected or potential conflicts of interest must be promptly disclosed and, if necessary, resolved. If you are not satisfied that a suspected or potential conflict of interest has been properly addressed, you should approach senior management, notify Legal, or use the Indivior [EthicsLine](#).

## Gifts and Entertainment

*We require our business interactions to be free of improper influence.*

The giving of personal gifts to healthcare professionals is not permitted. For non-healthcare professionals, we do not provide gifts or entertainment to improperly influence a decision or outcome.

As a principle-based organization, we don't define a value that determines inappropriateness. Consequently, related to your Indivior work, it is important to seek guidance and approval before providing or receiving a personal gift or hospitality to or from an external person or organization.

Refer to country-specific Written Standards for relevant prohibitions or established limits on gifts and

approvals and any associated external reporting required.

## Working with Governments

*We strive to work collaboratively, appropriately, and transparently with government entities.*

In the course of our work, we may interact with government agencies, officials, and public international agencies. In all circumstances, Workforce members must demonstrate integrity and comply with all Indivior and external requirements concerning government interactions.

We cooperate with government authorities and agencies while continuing to protect Indivior's rights and interests. Sometimes, contact with government officials as part of our work triggers disclosure or registration requirements, which we hold ourselves accountable to follow.

## Tax Evasion

*We have a zero-tolerance policy on tax evasion.*

Tax evasion is unethical and can be criminal where a person or entity underpays or avoids paying taxes using illegal methods. Facilitating tax evasion also can be criminal. For example, the UK Criminal Finances Act of 2017 imposed criminal liability for corporations who fail to prevent their staff or contractors from facilitating tax evasion in some circumstances.



## Care Enough to Coach

*In my country, it is a common business practice to give gifts to business contacts in order to build the relationship. If I don't give a gift it could cause offense. What should I do?*

There are certain situations where gifts are acceptable, provided that they:

- Are not provided to healthcare professionals.
- Comply with local law.
- Are not overly expensive or frequent.
- Fall within the local spending limits imposed by Indivior.
- Are approved in accordance with the applicable local procedures.
- Are not likely to cause embarrassment to Indivior if they were to be publicly disclosed.

# Compliance With Our Policies

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Indivior has a strict zero-tolerance policy on tax fraud, tax evasion, and the facilitation of tax evasion. Any actions that breach the tax laws in any country we operate in bring harm to Indivior and will not be tolerated.

Indivior will not tolerate, permit, or allow any person associated with it to engage in the facilitation of tax evasion or tax fraud by any of its customers, suppliers, business partners, contractors, or Workforce members anywhere in the world.

Seek immediate guidance from your supervisor if you believe that someone in our Workforce is attempting to commit or support tax fraud or tax evasion. Any suspicious activity also can be reported via [CCOTaxhelp@Indivior.com](mailto:CCOTaxhelp@Indivior.com) or the Indivior [EthicsLine](#).

## Use of Information Technology (IT)

*We are committed to the secure and responsible use of IT.*

At Indivior, we recognize the critical importance of maintaining the security and proper use of our information systems and devices. This is not only vital to the success of our business operations, but also to upholding public trust and confidence.

## Marketing and Promotional Information

*We are committed to promote our products responsibly and ethically.*

We believe that ethical and lawful product promotion is truthful and not misleading and is intended to support clinicians in making the best treatment decisions for their patients.

Indivior is committed to providing healthcare professionals with accurate and relevant appropriate data and information. As such, Indivior prohibits the use of unapproved marketing information and materials. Indivior has Written Standards that require all product and disease-state information to be pre-approved through defined review processes. In addition, the Indivior expert committees help maintain compliance with applicable regulatory requirements.

Indivior permits direct to consumer marketing only where permitted by local laws, and only after the necessary internal Indivior approvals have been received.



## Care Enough to Coach

*There is some software I want to download onto my work computer that I found through a file-sharing application. It is free and will streamline our work – is it OK to download?*

No. Even if well-intentioned, downloading this software could expose your computer and our network to risks. Check with the Group's IT Department first and obtain advance approval before downloading anything (free or otherwise) onto your computer.

# Compliance With Our Policies

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## Personal Information

*We are committed to the ethical use of all personal information.*

Indivior is committed to ensuring that personal information is processed in accordance with all applicable data protection and privacy laws and regulations.

Personal information may only be used for the purpose for which it was obtained and only disclosed when necessary. It is important that access to personal information is limited to only those with appropriate responsibilities, authority, and need to access such data.

## External Communications and Reporting

*We strive to disclose material information to the market accurately and promptly and we will maintain a regular dialogue with key stakeholders.*

Indivior makes it a priority to disclose material information accurately and promptly to the market in accordance with relevant laws and regulations, and aims to maintain regular dialogue with key stakeholders, including its investors, security analysts, members of the media and other key external stakeholders. By doing so, Indivior's strategy, business goals, and operations are able to be fully understood by key stakeholders. This includes disclosure of correct, up-to-date information on Indivior's progress and other material news that may be relevant to evaluating Indivior.



## Care Enough to Coach

*May I refer external media or investment community inquiries to approved Indivior information?*

No. You should immediately refer the inquiry to Global Impact & Corporate Affairs as only authorized Workforce may respond to these inquiries.



## Care Enough to Coach

*A healthcare professional just sent me a patient's name and date of birth via email. Should I just delete it?*

Yes. You should delete the email containing the patient's protected health information (PHI) and immediately notify Integrity & Compliance ([Compliance@Indivior.com](mailto:Compliance@Indivior.com)) of the event. Deleting the information removes it from your view, but it remains on our servers in compliance with document hold requirements.

# Compliance With Our Policies

## Confidential Business Information

*We will prioritize protecting confidential information from disclosure.*

Maintaining confidentiality is not just an Indivior requirement – it’s a commitment to maintaining trust with our stakeholders.

Board and Workforce members are required to maintain the confidentiality of information entrusted to them by Indivior or by its customers, suppliers, or partners, except when disclosure is expressly authorized or is required or permitted by law. Confidential information includes all nonpublic information (regardless of its source) that might be of use to Indivior’s competitors or harmful to Indivior or its customers, suppliers, or partners if disclosed. Improper or inappropriate disclosure or use of confidential information could impact the public’s trust in Indivior and put Indivior at risk of legal action, harm our business operations, and harm Indivior’s reputation.

## Business Intelligence Gathering

*We are committed to legal and ethical practices in gathering business intelligence.*

Indivior has access to a wide array of public information about other companies, their products, and services. Provided the information is collected lawfully, it is generally acceptable for Indivior to use this information to make

informed business decisions.

Workforce members are free to gather intelligence about companies from public sources such as websites, published articles, price bulletins, advertisements, brochures, public presentations, and appropriate interactions with individuals in the industry.

Business information about other companies, however, must only be collected and used ethically and in a way that does not violate laws or confidentiality obligations. Care should be taken when speaking to customers of other companies to ensure we do not explicitly or implicitly ask them to share information that is confidential to the other company. Workforce members may not engage a third party to conduct unlawful collection of information for use by Indivior (e.g., by misrepresenting who they are acting for or the purpose of seeking the information).

Indivior does use outside vendors to conduct business information gathering and reporting activities. When a third party is gathering information for Indivior, it is the responsibility of the Workforce member supervising the activity to make sure the vendor collects information legally.

If a Workforce member believes any information has been shared or received counter to these principles, the Workforce member should report the suspected or potential violation to Legal.

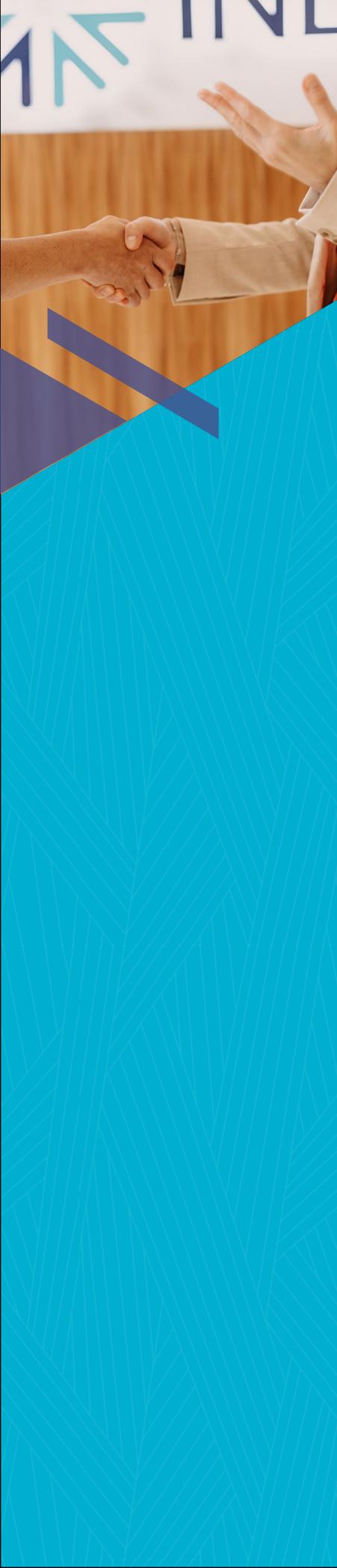


## Care Enough to Coach

*I was interviewing a candidate who used to work for a competitor. She told me about a new marketing strategy her former company is currently developing. Since she no longer works there, is it OK to share this information with our marketing team?*

No. If this information is not publicly available, it is not appropriate to use it for our benefit. This candidate has an obligation to protect the confidential information of her former employer (in the same way that you have an obligation to protect Indivior’s confidential information, should you leave our Company).

In a situation like this, it would be best to stop the candidate before she shares something that could be confidential or proprietary and contact the Legal Department about the incident.



# Compliance With Our Policies

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## **Dealing in Indivior Shares and Insider Trading**

*We will not trade while in possession of nonpublic information.*

We maintain and are committed to following internal Written Standards and external laws and regulations related to dealings in Indivior's shares and the shares of companies with which Indivior is conducting business.

Some of us at Indivior, through our work, may have access to information that is not publicly known, and that could affect Indivior's share price if it were known. No Board or Workforce member may purchase or sell any Indivior securities while in possession of material nonpublic information regarding Indivior, nor may any Board or Workforce member or sell another company's securities while in possession of material nonpublic information regarding that company. It is against Indivior Written Standards and illegal for any director, officer, or Workforce member to use material nonpublic information regarding Indivior or any other company to obtain profit for themselves; or directly or indirectly "tip" others who might make an investment decision based on that information.

# Environment, Health, and Safety

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## Environment and Climate Change

*Our daily actions support our environmental responsibilities and enable sustainable growth.*

At Indivior, we aim to sustainably grow how we discover, develop, and deliver innovative medicines to patients. To reach our environmental goals, we rely on our Workforce members to follow all Indivior requirements informing our operations. Whether in a research lab, an office, a manufacturing facility, or using a company car, complying with Indivior Written Standards can make a positive impact on our communities and the world.

## Workforce and Contractor Health and Safety

*We take meaningful steps to promote workplace safety.*

Indivior takes important measures to help keep our facilities safe, secure, and free from danger. The effectiveness of Indivior's health and safety Written Standards, management systems and performance provides our license to operate.

It is for these reasons that Indivior has devised a series of health and safety Written Standards that are appropriate to each Indivior location. The Workforce members are responsible for adhering to such Written Standards.



## Care Enough to Coach

*I have noticed some practices in my area that do not seem safe. Who can I speak to? I am new here, and I do not want to be considered a troublemaker.*

Discuss your concerns with your manager or raise the issue on the Indivior EthicsLine. There may be very good reasons for the practices. It is important to remember that raising a concern about safety does not make you a troublemaker, but a responsible Workforce member concerned about the safety of others.



## Care Enough to Coach

*I heard rumors on social media of an environmental concern involving one of our suppliers. I do not work with this supplier and am not sure if this is true. Should I do something?*

Yes. Talk to your manager or other Indivior resource about what you learned. If the environment is being harmed, that means our customers and communities could be harmed, too. We need to know about any harmful practices right away, so share your concerns.

# Respect for Each Other

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## Diversity and Inclusion

*We promote an inclusive and respectful culture that is free from bullying, harassment, and discrimination.*

Indivior recognizes that effective management of our global business involves the full consideration of diversity in our management procedures. We embrace diversity because it demonstrates our integrity, enhances performance, and also mirrors the diversity of the patients we serve.

Laws such as the UK's Equalities Act 2010 and the U.S.'s Title VII of the Civil Rights Act of 1964 prohibit discrimination on the basis of race, ethnicity, national origin, religion or religious beliefs, gender or gender identity, sexual orientation, age, or disability.

It is everyone's responsibility to foster an inclusive environment.

Discrimination, harassment, or bullying of any kind is prohibited. Indivior prohibits abusive, humiliating, or intimidating behavior. Everyone has an obligation to act if they observe or witness inappropriate behavior. Individuals may discuss incidents with their supervisor, or report confidentially either to Human Resources, Integrity & Compliance, Legal, senior management, or by using the Indivior [EthicsLine](#).

## Communities

*We are committed to fostering public health and safety in the communities where we work and live.*

Indivior recognizes that it has an important responsibility to work closely and have regular dialogue with regulators, legislators, healthcare professionals, and communities affected by substance use disorders, mental illness, and overdose. We also recognize our facilities are, and our Workforce members live and operate, in communities around the world. When conducting business, we are mindful that our business activities can and will positively impact communities. Indivior requires our Workforce members to also take appropriate care in meeting the expectations of our communities. This includes requirements informing public health and safety.

## Human Rights

*We respect the human rights of every individual.*

Respecting human rights wherever Indivior operates is the right thing to do and is linked to achieving Indivior's overall business aims and objectives.

Respecting human rights is also an important element of Indivior's obligations that are outlined in the OECD Guidelines for Multinational Enterprises, laws such as the UK Modern Slavery Act 2015, and the Universal Declaration of Human Rights, which Indivior supports.



## Care Enough to Coach

*One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?*

You should notify your manager or another resource or contact the Indivior EthicsLine. Sending these kinds of jokes violates our values as well as our policies that relate to the use of email and our standards on diversity, harassment and discrimination. By doing nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

# Corporate Matters

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## Political Donations

*Our political donations are intended to support patient access/needs and improved health outcomes.*

In many countries, political donations made by companies are highly regulated .

It is important that Indivior operates within the applicable local, national, and multinational laws and regulations concerning political donations and that Workforce members adhere to Indivior's Written Standards .

## Integrity of Indivior's Financial Records and Public Reports

*We recognize our legal and investor obligations to maintain accurate financial records.*

The books and records of Indivior must accurately reflect the nature of the underlying transactions . Books and records must be maintained in all respects according to law and the accounting principles and Written Standards that Indivior has adopted .

Each Board and Workforce member who contributes in any way to the preparation or verification of Indivior's financial statements and other financial information must ensure that Indivior's books, records, and accounts are accurately maintained . Each director, officer, and Workforce member must cooperate fully with Indivior's accounting and internal audit departments, as well as Indivior's independent public accountants and counsel . Each Board and Workforce member who is involved in Indivior's disclosure process must be familiar with and comply with Indivior's disclosure controls and procedures and its internal control over financial reporting . Indivior's [Code of Ethics for Senior Financial Officers](#) applicable to the senior financial officers responsible for managing Indivior's financial operations and overseeing its compliance with relevant laws, regulations, and rules related to financial reporting .

## Taxation

*We are responsible for complying with applicable tax laws and regulations.*

Management of Indivior's taxation affairs is the responsibility of the Finance and Legal functions . All communications and dealings with the taxation authorities should be addressed and referred to these departments to help ensure compliance with all applicable local, national, and multinational laws and regulations concerning taxation .



# Corporate Matters

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## Competition/Antitrust Laws and Trade Sanctions

*We are committed to fair competition.*

Indivior is subject to a variety of, local, national, and international laws and regulations concerning antitrust, competition, and trade sanctions.

Indivior believes that competitive activities should be conducted fairly, ethically, and in compliance with applicable law. Among other things, Indivior accordingly prohibits collusion with competitors, dissemination of deceptive or misleading information about competitors, or improperly acquiring or sharing competitors' confidential or proprietary information.

Trade sanctions are put in place to prevent individuals or entities from conducting business transactions that threaten the interests of sanctioning countries. They can be put in place for a variety of reasons such as preventing illegal activity and inhibiting acts of war and terrorism. Sanctions can be put in place nationally or internationally.

Indivior and our Workforce members are not permitted to do business with individuals or entities subject to sanctions. Indivior performs routine screening of individuals and entities with whom we do business against over a thousand sanction lists. Additionally, Workforce members are required to immediately notify Legal or Integrity & Compliance if they learn that a sanctioned individual or entity may be involved in an Indivior business activity.



## Care Enough to Coach

*I recently attended an industry conference. While I was there, I had lunch with my friend, who works for a competitor. She suggested that if I could get Indivior to charge more for one of our products, she could make sure her company charged the same price for a similar product. What should I do?*

In a situation like this, you should stop the conversation and tell your friend that this is not a proper business discussion. You should also excuse yourself from the meal and promptly report the conversation to the Legal Department. An agreement like this is improper and could not only violate antitrust and competition laws but also result in severe consequences for both the individuals involved and Indivior.

# Compliance With This Code

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The Board and Workforce members are required to comply with this Code. It is the responsibility of the Board to gain assurance, so far as is reasonably practicable, that the principles and ethical values embodied in this Code are communicated to the Workforce.

Fines to Indivior would impact the profit and loss and performance payments of our business. In addition, Indivior reserves the right to seek redress and damages from the individual(s) who have been found to have breached this Code, irrespective of the position and location the individual(s) might hold, in or out of Indivior, at the time the breach of this Code is identified.

The Board (in the case of a violation by a director or executive officer) and the Chief Legal Officer (in the case of a violation by any other person) in consultation with the Chief Integrity & Compliance Officer may, in its discretion, waive any violation of this Code. Any waiver for a director or an executive officer shall be disclosed as required by SEC and Nasdaq rules.

You will be required to certify, annually, that you understand the Code and that those you supervise are in full compliance with this Code for the operations for which you have responsibility. ■

