



# Doing The Right Things Right

Indivior Code of Conduct

[ENTER >](#)





... we foster  
and rely upon  
our strong  
culture of  
integrity.

## A LETTER FROM OUR CEO



### Dear Pioneers:

Our people, culture, expertise and insight, coupled with our innovative technology and stakeholder relationships, uniquely position us to help address patients' unmet needs around the world. Based on a clearly defined set of Guiding Principles, our culture is a key competitive advantage enabling us to progress towards our Vision, create societal value, drive strategic business growth, and – most importantly – make a difference for patients struggling with opioid use disorder and mental health disorders.

As we *focus on patient needs to drive decisions*, our Code of Conduct is in place to help ensure we adhere to the letter and spirit of industry codes, laws and regulations in all of the countries in which we operate.

The Code of Conduct is supported by a clearly defined set of policies and procedures to help guide our behaviors and actions to meet or exceed the expectations of stakeholders and relevant laws, regulatory requirements and voluntary commitments. Through our Guiding Principle *demonstrate honesty and integrity at all times*, we foster and rely upon our strong culture of integrity.

Patients, healthcare professionals and other stakeholders place trust in us and our products. This is a great privilege which comes with great responsibility. We must earn this trust each day by each serving as guardians of our reputation. We must also engage our business partners to help deliver our business priorities in full alignment with our Code of Conduct.

Our Code of Conduct is fully supported and endorsed by our Executive Committee and our Board of Directors.

Thank you for your commitment to continuing to make progress on our Vision, for living our Guiding Principles, and for adhering to our Code of Conduct and related policies and procedures in every interaction.

Mark

<b>A LETTER FROM OUR CEO</b>	<b>3</b>
<b>OUR CODE OF CONDUCT</b>	<b>6</b>
What is the purpose of the Code of Conduct?	6
To whom does the Code apply?	6
Where does the Code fit with Indivior’s overall approach to business?	6
<b>OUR GUIDING PRINCIPLES</b>	<b>7</b>
<b>COMPLIANCE WITH LAWS AND REGULATIONS</b>	<b>8</b>
<b>YOUR GUIDE TO MAKING THE RIGHT DECISION</b>	<b>10</b>
<b>OUR RESPONSIBILITIES</b>	<b>11</b>
Workforce Responsibilities	11
Manager Responsibilities	13
<b>OUR STANDARDS</b>	<b>14</b>
<b>HEALTHCARE PROFESSIONALS AND PATIENTS</b>	<b>16</b>
Relationships With Healthcare Professionals	16
Research and Development	17
Patient Safety	18
<b>COMPLIANCE WITH OUR POLICIES</b>	<b>19</b>
Bribery and Corruption	19
Conflicts of Interest	20
Gifts and Entertainment	22
Working With Governments	23
Tax Evasion	24

Use of Information Technology (IT)	25
Marketing and Promotional Information	26
Personal Information	27
External Communications, Reporting and Social Media	28
Confidential Business Information	30
<b>ENVIRONMENT, HEALTH AND SAFETY</b>	<b>32</b>
Environment and Climate Change	32
Workforce and Contractor Health and Safety	33
<b>RESPECT FOR EACH OTHER AND GROUP ASSETS</b>	<b>34</b>
Diversity and Inclusion	34
Communities	35
Human Rights	36
Use of Indivior’s Physical Assets	37
<b>CORPORATE MATTERS</b>	<b>38</b>
Dealing in Indivior Shares	38
Insider Dealing	39
Political Donations	40
Integrity of the Group’s Financial Records and Public Reports	41
Taxation	42
Competition/Antitrust Laws and Sanctions	43
<b>COMPLIANCE WITH THIS CODE</b>	<b>44</b>

# OUR CODE OF CONDUCT

Indivior is committed to responsible corporate behavior; this includes high standards of conduct in our relationships with Workforce members, contractors, customers, consumers, shareholders, suppliers, governments, competitors and the local communities in which we operate.

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

The purpose of this Code of Conduct (the “Code”) is to set out the Guiding Principles and standards that Indivior PLC and its subsidiaries (together “Indivior” or the “Group”) wish to promote and uphold. Its aim is to promote and ensure the legal and ethical conduct of persons acting on behalf of the Group.

### To whom does the Code apply?

The Code applies to the Board of Directors (the “Board”) and full- and part-time employees and contingent workers (“Workforce”), students, interns, contractors and consultants globally.

### Where does the Code fit with Indivior’s overall approach to business?

Indivior is committed to conducting its business on a foundation of strong ethical and legal principles and standards. These apply to everyone and are central to maintaining the integrity of Indivior.

The Code is supported by policies and standard operating procedures (“SOPs”), which support and underpin the Code and should be complied with at all times.

*Indivior is committed to conducting its business on a foundation of strong ethical and legal principles and standards.*

# OUR GUIDING PRINCIPLES

Every decision we make is informed by our Guiding Principles, and everything we do is intended for the benefit of patients.



Focus on Patient Needs to Drive Decisions



Seek the Wisdom of the Team



Believe that People’s Actions are Well Intended



Care Enough to Coach



See it, Own it, Make it Happen

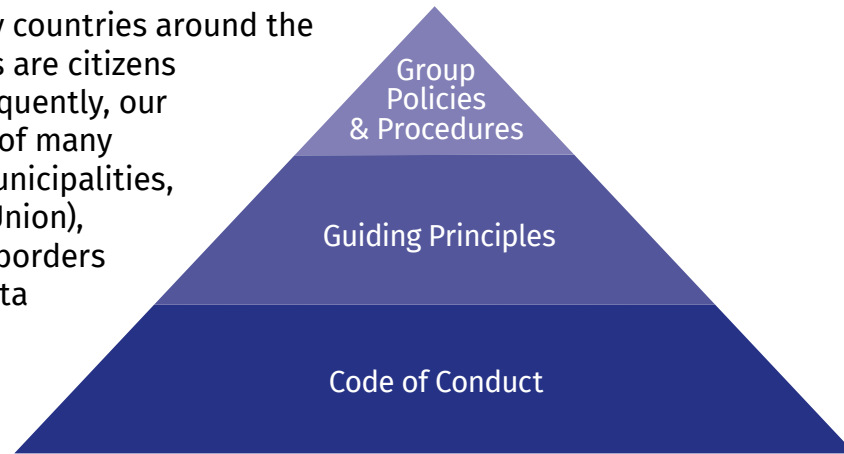


Demonstrate Honesty and Integrity at All Times



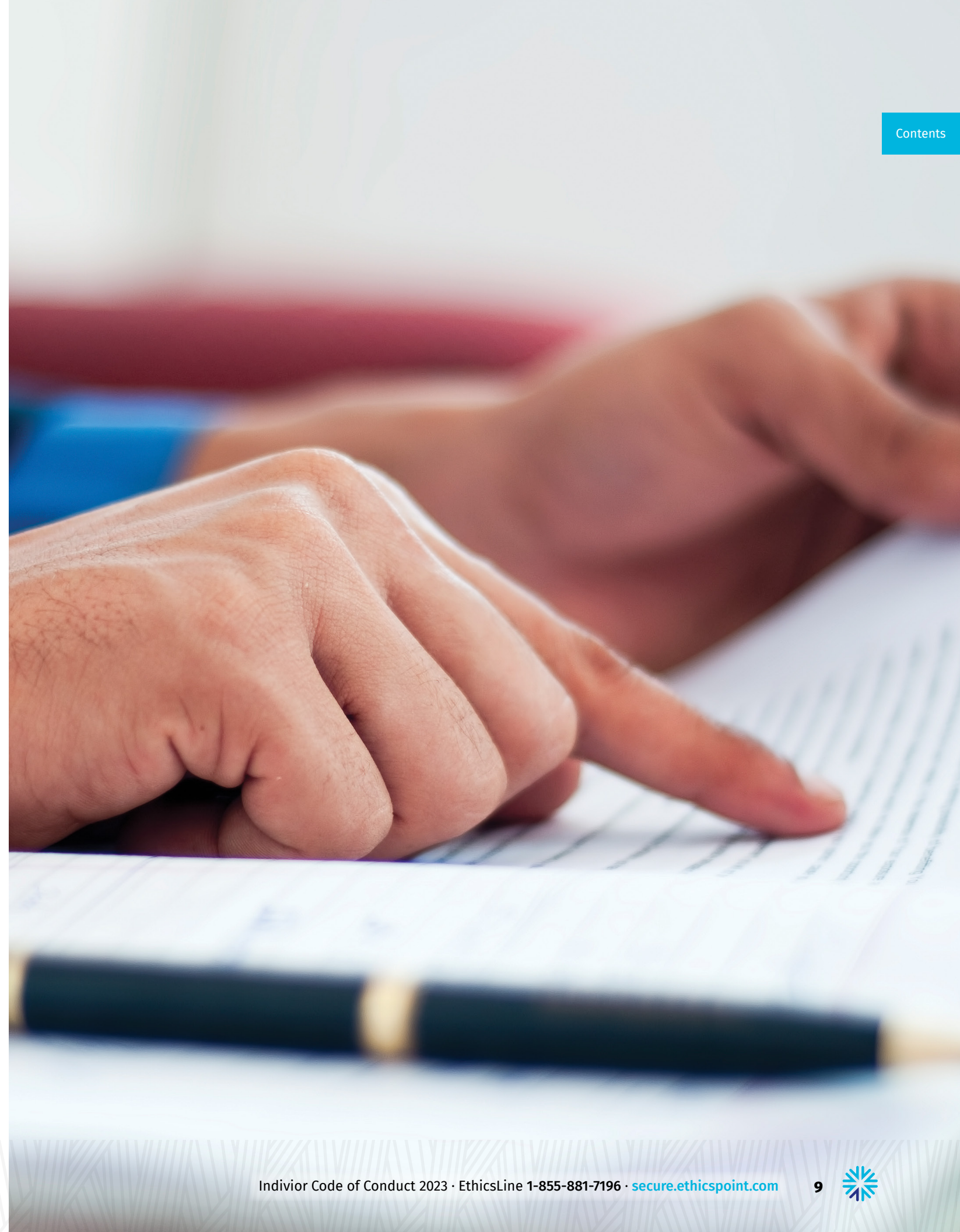
# COMPLIANCE WITH LAWS AND REGULATIONS

Indivior conducts business in many countries around the world, and our Workforce members are citizens of many different countries. Consequently, our operations are subject to the laws of many countries, provinces, states and municipalities, and organizations (e.g., European Union), some of which extend beyond the borders of that country (e.g., EU General Data Protection Regulation, U.S. Foreign Corrupt Practices Act). It is important to understand how these laws may apply to our operations.



In addition to this Code, you are expected to comply with all applicable Group policies and procedures and government laws and regulations. Where stricter local requirements apply, the stricter local requirements always take precedence and must be adhered to in all circumstances. Contact Integrity & Compliance ([Compliance@Indivior.com](mailto:Compliance@Indivior.com)) for any unresolved conflicts between this Code of Conduct and local requirements.

This Code does not cover every law or situation each of our Workforce members may encounter. Rather, it serves as our compass for acting with good intent and with *honesty and integrity at all times*, seeking appropriate guidance when needed.

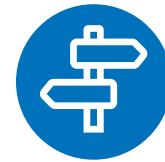




# YOUR GUIDE TO MAKING THE RIGHT DECISION

We believe that people's actions are well intended. We must also strive to ensure our decisions and ultimately our actions are consistently in line with our Code of Conduct and all relevant policies and procedures.

This requires you to have a complete understanding of our Code, policies and procedures related to your area of responsibility. In addition to following the letter of these important documents, it is equally important to embrace the spirit of these guiding resources.



## Facing an ethical situation?

### Ask yourself:

- Is the conduct consistent with our Code, Group 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.

# OUR RESPONSIBILITIES

## Workforce Responsibilities

### Familiarize yourself with the Code.

We expect and rely on our Workforce members to uphold and enforce our Code of Conduct, Guiding Principles, and our related standards. If you know or believe there is a potential violation of our Code of Conduct, policies, laws, regulations, or an activity that could lead to a violation, it is your responsibility to Speak Up.

A "concern" refers to a report of suspected or potential violation of the Indivior Code of Conduct, any law, regulation or Group policy applicable to the Group's business and operations. Concerns also include suspected or potential deviations from procedures related to the topics covered in this Code, including Fraud, Human Resources, Scientific or Medical Misconduct, Quality, Interactions with HCPs/ Government Officials and any transfers of value, Patient Safety, Conflicts of Interest, Information Security, Anti-Bribery/Corruption, or Marketing/Promotional activities. These concerns do not need to be reported to Integrity & Compliance if: (a) they are related to procedures that are captured and remediated via documented control processes within functional areas, with oversight by Integrity & Compliance, or (b) are purely HR-related concerns that are managed/investigated within the Human Resources Department.

If in doubt about reporting, contact Integrity & Compliance for guidance or simply report it via any of the multiple available options. Any recipient of such a report shall promptly notify Integrity & Compliance or EthicsLine of the report and any additional information relevant to the concern. Concerns that are purely HR-related may be reported via any of the multiple avenues of reporting and if made directly to Human Resources would not require notification to Integrity & Compliance.



## Speak Up

Have an ethics question or compliance concern?

Contact Integrity & Compliance.

EthicsLine is available 24 hours a day, 7 days a week in every country in which we operate. Information on how to report a concern can be found by:



**Dialing**  
1-855-881-7196  
in the U.S.

**Visiting**  
[secure.ethicspoint.com](https://secure.ethicspoint.com).

The secure website will provide instructions on reporting from your specific country.





# OUR RESPONSIBILITIES

## Workforce Responsibilities (Cont.)

You can raise questions or concerns with your manager or any functional area manager in the reporting line of succession, Human Resources, Integrity & Compliance, Legal, 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.

Any matter reported to Integrity & Compliance or through the EthicsLine is treated in confidence and is shared only with Workforce members who need to know about these matters for the purposes of an investigation and, if appropriate, corrective action. Reports may be made anonymously where local laws and regulations permit.

It is important that you provide as many details as possible to help ensure the matter can be addressed thoroughly and promptly. You also have a responsibility to fully cooperate in an investigation.

The Group will not retaliate against any individual who reports a concern in good faith or participates in the Group's investigation of such a concern. Any Workforce member found to have retaliated against anyone for reporting or participating in an investigation will be disciplined according to Group policy.



[Confidential Reporting and Non-Retaliation Policy](#)



*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.*

## Manager Responsibilities

### Set an example.

Managers have an important responsibility to set an example and consistently act in accordance with and coach others in line with our Code and policies.

As a leader you must:

- Create a culture of compliance in which our Workforce understands their responsibilities and feels comfortable raising concerns to you or others without fear of retaliation.
- Encourage ethical conduct and compliance with the law by personally leading compliance efforts.

- Consider compliance efforts and outcomes when evaluating and rewarding Workforce members.
- Ensure that Workforce members understand that business results are never more important than compliance with our Code, related standards and acting with integrity.

Managers must also take steps to help integrate our compliance program throughout Indivior to **learn, adjust** and **prevent** compliance issues in a timely and ongoing manner.

Prevent Compliance Issues	Detect Compliance Issues	Respond to Compliance Issues
Identify compliance risks and ensure that processes are tailored to address the risk areas, and are effectively communicated and implemented.	Identify and implement effective control measures to help mitigate and detect new or emerging risks and/or potential violations.	Take prompt action to correct any identified compliance gaps.
Educate Workforce members and third parties on our Code, policies and applicable law as relevant.	Engage in ongoing regular oversight and dialogue to help ensure compliance in your areas of responsibility.	Engage in ongoing coaching, education and development to help mitigate recurrence.
Ensure adequate resources are assigned to achieve compliance.	Ensure that periodic compliance reviews are conducted by your own leaders, in addition to Integrity & Compliance and Internal Audit Services.	Take appropriate disciplinary action according to policy when warranted.  Immediately share any reports of suspected non-compliance with Integrity & Compliance.



# OUR STANDARDS

HEALTHCARE PROFESSIONALS  
AND PATIENTS

COMPLIANCE WITH OUR POLICIES

ENVIRONMENT, HEALTH  
AND SAFETY

RESPECT FOR EACH OTHER  
AND GROUP ASSETS

CORPORATE MATTERS

Contents





# HEALTHCARE PROFESSIONALS AND PATIENTS

## Relationships With Healthcare Professionals

**We will conduct relationships with healthcare professionals responsibly and with integrity.**

Indivior believes that it is very important that all dealings with healthcare professionals are conducted responsibly and with integrity at all times.

Laws and regulations in the United States and many other countries restrict the offer of anything of value as an inducement to purchase, recommend, prescribe, prefer or influence the purchase of pharmaceutical products that are paid for by a government healthcare program or to supply a reward for such activities.

It is important to note that these requirements address direct, indirect, implicit and explicit actions and that local laws concerning specific activities may vary.

Any conduct that violates these requirements results in any number of negative consequences including, but not limited to:

- Significant financial penalties for the Group, the Board and our Workforce members.
- Sanctions against Indivior’s products, significant reputational damage and imprisonment of the Group’s Workforce members.

It is therefore very important that all dealings with healthcare professionals are conducted responsibly. All Workforce members who are involved in the sales and marketing of Indivior’s products or interactions with healthcare professionals should ensure that they are familiar with the Group’s policies and procedures which have been designed to ensure compliance and adhere to them at all times.

It is also essential that Workforce members, students, interns, contractors, and consultants globally report any suspected or actual breaches of the Group’s policies and procedures concerning healthcare professionals promptly to their line manager, Integrity & Compliance or the Indivior EthicsLine.

*... all dealings with healthcare professionals are conducted responsibly and with integrity at all times.*

## Research and Development

**We will monitor and conduct our research and development processes in line with industry best practice.**

The Group will continue to ensure that its research and development processes are robustly monitored and are conducted in line with industry best practice and the appropriate laws and regulations at all times. These activities will continue to include the maintenance of appropriate informed consent procedures in connection with Indivior’s research and development programs.





# HEALTHCARE PROFESSIONALS AND PATIENTS

## Patient Safety

**The promotion and maintenance of patient safety is a fundamental priority for everyone.**

Indivior regards the promotion and maintenance of patient safety as a fundamental priority and, in common with industry best practice, maintains a pharmacovigilance system for this purpose. The Group will comply with all the relevant laws and regulations relating to this aspect of its activities including maintaining the required documents and records and the training and development of its Workforce members, students, interns, contractors, and consultants.

The Group is committed to the detection and reporting of adverse events and quality complaints associated with its products and is required to do so under the laws and regulations under which it operates.

Indivior’s Board, Workforce members, students, interns, contractors and consultants globally should, if they become aware of any such adverse events, immediately report the information to the Patient Safety mailbox within one (1) business day.

The Group continues to work actively alongside regulatory authorities to combat counterfeiting. It is the responsibility of each Workforce member, student, intern, contractor and consultant to report any incidents of this nature as soon as they become aware of them to the Patient Safety mailbox within one (1) business day.



**Seek the Wisdom**

[Global Safety Information Reporting SOP](#)



**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.*

**The Group is committed to the detection and reporting of adverse events and quality complaints associated with its products ...**

# COMPLIANCE WITH OUR POLICIES

## Bribery and Corruption

**We do not give or take bribes or participate in corrupt activity.**

A bribe is a payment or benefit (including gifts, which are also addressed in this document – [See Gifts and Entertainment](#)) offered for the purposes of influencing a decision or outcome improperly. Bribery is a criminal offense in all countries in which the Group operates.

Laws in the United Kingdom and the United States of America concerning bribery (in particular the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act) apply to all of the Group’s activities anywhere around the world. For example, the UK legislation makes the Group, as well as individuals, criminally liable for any acts of bribery committed by its Workforce, contractors and any other parties performing services on Indivior’s behalf unless it can show that there are “adequate procedures” in place to prevent acts of bribery from occurring.

It is important to remember, when conducting day-to-day activities, that even small payments could be regarded as a bribe under these laws. An example is facilitation payments which, in some countries, are a relatively common way of ensuring that activities involving government officials are expedited promptly.

You should seek immediate guidance from your line manager if you believe that you have been asked to make or receive a bribe. You should seek similar guidance if you believe that a Workforce member has been asked to make or receive a bribe. The Indivior EthicsLine provides a forum for all Workforce members, students, interns, contractors and consultants globally to confidentially express any concerns they may have.



**Seek the Wisdom**

[Anti-Bribery and Corruption Policy](#)



**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 the Group’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 Group 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.*

# COMPLIANCE WITH OUR POLICIES

## Conflicts of Interest

**We make decisions objectively, in an unbiased manner that are free from conflicts of interest.**

Conflicts of interest occur when a personal stake in a matter may affect someone’s ability to make an objective or unbiased decision that is in the best interests of the Group.

They can arise in many different instances and can include:

**1** The recruitment or management of a family member or a close friend.

**2** The holding of financial interests in suppliers, customers, contractors or business partners.

**3** Being a member of the senior management team in a competitor organization or a charity which has approached the Group for funding.

**4** Being a member of a community which has approached the Group for support relating to an education project.

No one should participate in a decision on any matter where they have a conflict of interest. Conflicts of interest can have damaging consequences for the reputation of both individuals and Indivior. If you become aware of a potential conflict of interest involving you or one of our Workforce members, you should inform your line manager immediately. It should be promptly discussed, recorded and resolved as soon as possible. If you are not satisfied that this has been done, you should approach senior management for a discussion about the subject or use the Indivior EthicsLine.

### Consider this...

Simply having a conflict of interest isn't a disqualifier for working with us, but you must disclose any potential conflicts to your manager, Human Resources or Integrity & Compliance so that we can evaluate and ensure that we remain compliant with relevant laws and regulations.

Here are some potential conflicts of interest:

- A neighbor wants to apply for a job with our Group. He asks if you would put in a good word for him with the hiring committee.
- You volunteer with a charity and are asked to approach Workforce members at work for a donation.
- You have a romantic or familial relationship with someone who is either employed by or does business with the Group.



### 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.



### Seek the Wisdom

[Conflict of Interest Policy](#)



# COMPLIANCE WITH OUR POLICIES

## Gifts and Entertainment

**We do not receive or supply gifts or entertainment to improperly influence a decision or outcome.**

**The giving of gifts to healthcare professionals is not permitted.** In connection with receiving or supplying gifts or entertainment, it is important to remember that even the suggestion that corruption has been committed can have serious consequences for both Indivior and the individual or individuals concerned. You should be aware that if a benefit or gift has been offered for the purposes of improperly influencing a decision or outcome, a criminal offense has been committed under the laws and regulations which apply to Indivior.

It is also important to note that the financial amount involved may not necessarily be large (the cost of a lunch for instance). Consequently, it is important to remember to seek guidance and approval before accepting or giving a gift or hospitality. Refer to specific local policies and procedures for relevant prohibitions or established limits on gifts and approvals and reporting required.

*... even the suggestion that corruption has been committed can have serious consequences ...*



### 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 companies.
- Are approved in accordance with the applicable local procedures.
- Are not likely to cause embarrassment to the Group if they were to be publicly disclosed.



### Seek the Wisdom

[Anti-Bribery & Corruption Policy](#)

## Working With Governments

**We will operate within applicable laws and regulations at all times.**

In the course of our work, we may interact with government agencies, officials and public international agencies. In all circumstances, Indivior Workforce members must apply our Guiding Principle of integrity and comply with all relevant laws and regulations, including any special requirements associated with government transactions.

We make every effort to cooperate with government authorities and agencies while continuing to protect Indivior's rights and interests. When we are asked to provide Group information, or make public announcements, we do so truthfully, accurately and timely.



# COMPLIANCE WITH OUR POLICIES

## Tax Evasion

### We will comply with Indivior’s zero-tolerance policy on tax evasion.

Tax evasion is a crime that occurs when a person or entity underpays or avoids paying taxes using illegal methods. Facilitating tax evasion is a crime. The UK Criminal Finances Act of 2017 introduced offenses for corporations failing to prevent their staff or contractors from facilitating tax evasion.

The Group operates a strict zero-tolerance policy on tax evasion including the facilitation of tax evasion. Any actions that breach the tax laws in any country we operate in brings harm to the Group and will not be tolerated.

The Group 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.

You should seek immediate guidance from your line manager if you believe that a Workforce member, student, intern, contractor or consultant is attempting to commit tax evasion. Alternatively, any suspicious activity can be reported via [CCOTaxhelp@Indivior.com](mailto:CCOTaxhelp@Indivior.com) or the Indivior EthicsLine.

*Any actions that breach the tax laws in any country we operate in brings harm to the Group ...*

## Use of Information Technology (IT)

### We will use information technology responsibly.

“IT” refers to the Group’s computers (including laptops and tablets), telephone and cellphone or mobile telephone equipment and associated hardware and software. Workforce members may make reasonable personal use of Group IT, subject to the stipulations recorded below, providing this does not become unreasonably excessive or intrusive for their Workforce members, students, interns, contractors and consultants globally, and does not disrupt or interfere with normal business operations.

You should be aware that certain activities, such as the downloading or copying of unauthorized software or visiting certain websites, may compromise the Group’s IT systems through, for instance, importing malicious software (also known as malware). The Group discourages the installation of non-business applications, and you should not download software without the permission of an authorized member of the Group’s IT Department. You should not use Group IT to view or visit inappropriate websites or other online services. These include online facilities that contain information which is illegal or offensive. Adult entertainment services should never be visited using Group IT.

You should also be aware that use of the Group’s computer resources may be monitored and accessed by the Group where permitted by local and/or regional laws and regulations.



### 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.*



### Seek the Wisdom

[Computer Resources](#)  
[Acceptable Use Policy](#)



# COMPLIANCE WITH OUR POLICIES

## Marketing and Promotional Information

### Information and data that we supply about our products will be appropriate and meant to improve patient treatment and care.

Indivior believes that the promotion of Group products should only be conducted according to clinical appropriateness and never, under any circumstances, as the result of other motivations.

Indivior’s goal is to ensure that healthcare professionals are provided with appropriate data and information relating to its products that improves end-user treatment and care. Consequently, the Group prohibits use of any unapproved marketing information and materials. Indivior has put in place policies and procedures that require all product information materials to be reviewed by the appropriate individuals before use.

The information supplied with Indivior’s products and the associated communications (such as product labels) is an area which is subject to various laws and regulations in the countries that Indivior operates and it is essential that the Group complies with these requirements. Failure to do this may lead to punitive sanctions against the Group, its Workforce members and its products.

Indivior will only market its products directly to consumers where this activity is permitted by local laws and regulations and only after the necessary internal Indivior approvals have been received.

It is also essential that Workforce members, students, interns, contractors and consultants globally report any suspected or actual breach of the Group’s policies and procedures concerning the promotion and marketing of its products promptly to their line manager, Integrity & Compliance or the Indivior EthicsLine.

## Personal Information

### Personal information will be held in confidence, maintained securely and never disclosed inappropriately.

Indivior believes that it is very important that personal information is held in confidence, maintained securely and not disclosed inappropriately to third parties. Indivior is committed to ensuring that any personal information that we hold is maintained in accordance with the regulations, data protection and privacy laws applicable in the countries in which the Group operates.

Personal information should only be used for the purpose for which it was obtained and only disclosed on a need to know basis. It is important that everyone ensures that only people with the appropriate responsibilities and authority (such as members of the Human Resources and Governance teams) have access to personal information.

Everyone in possession of personal information as part of their role should:

- Commit to ensuring that it is only used for legitimate business purposes.
- Ensure that it is retained only for as long as is necessary and then deleted or disposed of securely.

If you have any concerns about the Group’s processes and procedures concerning personal information, please discuss them with your line manager or with the Legal Department.



### 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.*



### Seek the Wisdom

[Data Privacy Policy](#)

# COMPLIANCE WITH OUR POLICIES

## External Communications, Reporting and Social Media

**We will conduct regular dialogue with our stakeholders and will address any material information requests or concerns accurately, promptly and diligently.**

Indivior aims to ensure that it is in regular dialogue with its investors and other external stakeholders and to address any concerns or information requests that they may have about its activities accurately and promptly. Indivior does this to ensure that the Group’s operations are fully understood, with correct, up-to-date information being disseminated about the Group, to protect and manage its reputation.

The Group is also required to comply with the laws and regulations that apply to companies with shares that are publicly listed and traded. These govern when, how and in what form Indivior PLC discloses and reports information to the investment community and the outside world. They prohibit, for example, selective disclosure of trading or other inside information which, when made widely available, would be likely to have a significant effect on the share price of Indivior PLC.

It is extremely important that these regulations are complied with and failure to do this can lead to significant and punitive sanctions for individual Workforce members and the Group.

### Consider this...

- Prior to engaging on social media, ask yourself:
- Am I authorized to post this information?
  - Does my post comply with laws, regulations, and self-regulatory industry codes?
  - How could this affect our stakeholders?
  - How could this affect Indivior’s reputation?

In common with other publicly-listed companies operating internationally, Indivior maintains Global Impact & Corporate Affairs, Governance and Investor Relations teams, based in Slough, UK and Richmond, VA. They are responsible for responding to external inquiries and compliantly conducting the Group’s communications with its investors, the media and other stakeholders via Indivior’s official channels, including social media accounts.

Indivior and its Workforce must at all times ensure that all of their communications related to Indivior or its products, whether oral or written, comply with relevant laws, regulations, and self-regulatory industry codes. Indivior has established appropriate governance, controls and responsible Workforce to help ensure this compliance. Refer to “Seek the Wisdom” for relevant governance on corporate and personal use of social media.



### 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.*



### Seek the Wisdom

[Social Media Workforce Engagement Policy](#)  
[Review and Approval of Corporate Communications Policy](#)



## COMPLIANCE WITH OUR POLICIES

# Confidential Business Information

### We will make every effort to protect confidential information from disclosure.

The business information that Indivior holds and maintains includes commercially sensitive technical and non-technical data about the Group's activities which it uses during its day-to-day business.

Consequently, this needs to be protected from disclosure because improper or inappropriate use might:

- Harm the Group's activities if it comes into the possession of a competitor.
- Put Indivior, its Board, Workforce members, students, interns, contractors and consultants at risk of legal action if, for example, inadvertent or deliberate release of information materially affects the share price of Indivior PLC or affects the value of intellectual property that is jointly owned by a business partner.
- Damage Indivior's reputation.

It is therefore important that Indivior's policies and procedures concerning the disclosure and maintenance of confidential information are adhered to at all times. For example, confidential information should only be shared with other organizations (such as advisors and consultants) after the appropriate confidentiality agreements have been signed.

Particular attention should be paid to copying, storing and disposing of information. It is important, for instance, that copies of documents containing confidential material that are no longer required are either shredded or disposed of in a secure manner unless the documents are subject to a litigation hold issued by the Indivior Legal Department. It is also important that office procedures are maintained and adhered to particularly during evenings and weekends.



### 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.*





# ENVIRONMENT, HEALTH AND SAFETY

## Environment and Climate Change

**We will strive to achieve environmental performance standards in line with good practice and address the challenges presented by climate change.**

Indivior's stakeholders, including many of its significant shareholders, pay close attention to the Group's environmental performance and its approach to addressing climate change. This aspect of the Group's affairs is subject to a variety of laws and regulations and is regularly monitored in some instances by the authorities. The effectiveness of Indivior's environment and climate change policies, management systems and the Group's performance is directly linked to Indivior's license to operate at some locations (particularly in Hull) and the management of its reputation. Indivior aims to achieve the highest standards of environmental performance through the development and implementation of its policies and systems. It is very important that these procedures are adhered to at all times to ensure that the Group's objectives are achieved. You should therefore be aware of all the relevant environmental protection measures that relate to your job and take care to ensure that you and your Workforce members abide by their requirements. Any suspected or potential policy or system contraventions should be reported immediately to your line manager. Indivior also recognizes it has a responsibility to find ways to minimize its greenhouse gas emissions and to approach the challenges presented by climate change in a responsible way. Indivior relies on the expertise of its Workforce members to enable the Group to innovate in this important area and is always looking for ways to improve its performance. Suggestions and ideas from anyone in the Group about how to do this are always welcome and should be discussed with your line manager in the first instance.



**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 Group 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.*

## Workforce and Contractor Health and Safety

**Our workplace will be safe, secure and healthy.**

Indivior believes that it is very important to ensure that each and every Workforce member, student, intern, contractor and consultant globally is working in a place that is safe, secure, healthy and free from danger at all times. The effectiveness of Indivior's health and safety policies, management systems and the Group's performance is linked to Indivior's license to operate at some of its locations and is subject to a range of laws and regulations. At all Group locations, Indivior's approach to this important area is linked to its Workforce member relations, its relationship with other stakeholders and the management of its reputation.

It is for these reasons that Indivior has devised a series of health and safety policies and procedures which are appropriate to each Group location. Everyone should ensure that they are familiar with these rules and procedures and adhere to them at all times.

Workforce members, students, interns, contractors and consultants globally who become aware of possible or actual breaches of Group health and safety policies and procedures should report this information immediately to their line manager.



**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.*



# RESPECT FOR EACH OTHER AND GROUP ASSETS

## Diversity and Inclusion

**Our workplaces will be inclusive, respectful to everyone and free from bullying and harassment.**

Indivior recognizes that effective management of a global business involves full consideration of diversity matters in its appointment and management procedures for Workforce members, students, interns, contractors and consultants globally at all levels. Laws such as the UK’s Equalities Act 2010 and the U.S.’s Title VII of the Civil Rights Act of 1964 state that these include factors (described in the law as protected characteristics) such as race/national origin, religion or religious beliefs, gender or gender identity, sexual orientation, age or disability.

Indivior also regards and values Workforce members, students, interns, contractors and consultants globally, at all levels of the business which is comprised of people drawn from different socioeconomic backgrounds. It is everyone’s responsibility to create an inclusive environment which leads to a constructive and productive workplace at all times. This means that everyone should listen to others, respect differing views and value their input.

Harassment or bullying of any kind has no place in the Indivior workplace. The Group prohibits abusive, humiliating or intimidating behavior. Everyone should ensure that they do not behave in this way and that others do not either.

Everyone has an obligation to act if they observe or witness behavior which is inappropriate. This may mean discussing the matter directly with the person or persons involved, discussing it with your line manager, seeking advice from other sources that are available or reporting it confidentially either to Human Resources, Integrity & Compliance, Indivior’s senior management or by using the Indivior EthicsLine.

*... listen to others, respect differing views and value their input.*



### 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.*



### Seek the Wisdom

[Diversity & Inclusion Policy](#)

## Communities

**We will conduct community relationships sensitively and respect human rights at all times.**

Indivior recognizes that the Group has an important responsibility to work closely and have regular dialogue with regulators, legislators, healthcare professionals and communities affected by substance use disorders and mental illness. The Group aims to improve awareness of substance use disorders and mental illness issues and to conduct its relationships with its communities in line with legal, best practice and regulatory requirements. The Group aims to conduct these activities sensitively and with mutual respect and to develop projects which are impactful in the long term.

Successful community relationships are the product of a responsible approach which is tailored to the particular circumstances of each stakeholder group. It is important that everyone involved in this aspect of the Group’s activities understands that these relationships are vital to the success of the business in the short, medium and long term and to the Group’s aim to address substance use disorders and mental illness issues in an effective and robust manner.

### Consider this...

The Universal Declaration of Human Rights contains 30 articles which outline the rights to which everyone should be entitled, including the right to:

- Not be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
- Be free from slavery, servitude and forced labor.
- Be free from arbitrary arrest or detention.
- Freedom of movement.
- Freedom of thought and religion.
- Freedom of expression.
- Freedom of peaceful assembly and association.
- An adequate standard of living.
- Just and favorable conditions of work.

# RESPECT FOR EACH OTHER AND GROUP ASSETS

## Human Rights

### We will respect the human rights of every individual.

Human rights are the basic freedoms that everyone should enjoy regardless of matters such as faith, creed, race, origin, gender, age, disability, sexuality and other diversity matters. Respecting human rights wherever Indivior operates is clearly linked to achieving the Group’s overall business aims and objectives.

They are also an important element of the Group’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).

The actions Indivior takes to support and respect human rights play a significant role in developing and maintaining the Group’s relationships with its communities, Workforce members, students, interns, contractors, consultants, business partners and governments and present significant opportunities and risks to the reputation of the business and its stakeholder relationships. Consequently, it is important that everyone understands Indivior’s approach to human rights, the policies and management systems that it has put in place to manage this aspect of the business effectively.



Seek the Wisdom

[Modern Slavery Statement](#)

## Use of Indivior’s Physical Assets

### We will maintain group property and equipment in a safe and secure manner.

Everyone is responsible for making sure that Indivior’s property and equipment are safe, secure, properly maintained and cared for appropriately.

It is important, in particular for health, safety and security reasons, that the Group’s assets are not:

- Lost
- Stolen
- Damaged
- Wasted
- Used incorrectly or for inappropriate reasons

The key principle that should be applied at all times is that Indivior’s physical assets should not be borrowed, donated or given to other organizations or individuals unless this has been appropriately authorized. They should only be used for the authorized purposes for which they are designed. They should be cared for, kept secure and regularly maintained in line with the policies and procedures that Indivior has provided.



Seek the Wisdom

[Mobile Device Policy](#)

[Information Security Risk Management Policy](#)

[Computer Resources Acceptable Use Policy](#)



# CORPORATE MATTERS

## Dealing in Indivior Shares

**We will adhere to applicable internal and external guidelines that relate to dealings in the Company's shares.**

Indivior's shares are traded on the London Stock Exchange. This means that the Group's Board, Workforce members, students, interns, contractors and consultants globally are required to follow standards of practice and procedures when dealing in Indivior PLC's shares and other securities ("Securities") and those of companies that Indivior is conducting business with.

Indivior has adopted a Group-Wide Dealing Policy. All Workforce members must ensure that they are familiar with its requirements.

In addition, certain members of the Board, Workforce members, students, interns, contractors and consultants globally are considered "Restricted Persons" and must comply with the additional restrictions as set out in the Group's Dealing Code. Restricted Persons must not deal during closed periods and must seek clearance to deal at all other times.

The governing frameworks outline the clearance procedures that are required to be followed by people who are affected by them when dealing in Indivior Securities or those of its business partners. They prohibit insider dealing (trading or encouraging trading on the basis of inside information). They also ban the passing on of unpublished price-sensitive information.

Any queries regarding dealing in Indivior shares should be directed to the Company Secretary.



**Care Enough to Coach**

*My family sometimes asks me about Indivior and wonders if they should buy our shares. Since I am proud of our Company, I usually tell them what I know about our business and encourage them to buy shares. Is this a problem?*

*Yes. If you give a friend or relative information about Indivior that is considered "Inside Information," and that person buys or sells shares based on this information, both of you could be found liable of market abuse or insider dealing. You are also under a duty of confidentiality with respect to any confidential information you receive and you must not use or disclose such information without prior authorization. Make sure any information you share is publicly available.*



**Seek the Wisdom**

[Indivior PLC Group-Wide Dealing Policy](#)  
[Indivior PLC Dealing Code](#)

## Insider Dealing

**We will not deal based on "inside information"**

You are prohibited from dealing in Securities on the basis of "inside information." Inside information is information which is not publicly available, which is likely to have a non-trivial effect on the price of Indivior Securities and which an investor would be likely to use as part of the basis of his or her investment decision. Dealing on the basis of inside information is illegal.



**Seek the Wisdom**

[Indivior PLC Dealing Code](#)





## CORPORATE MATTERS

### Political Donations

#### We will comply with applicable laws and regulations regarding political donations.

A political donation or contribution is the supply of financial or other Group resources to support the activities of a political party or organization. In many countries, political donations made by companies are tightly regulated. In the UK, for example, Company law states that shareholders must approve the amount of political expenditure incurred by the Group at its Annual General Meeting.

In some countries such as the United States, companies are permitted by local laws and regulations to contribute funds to political organizations that address an issue that directly affects its business activities.

It is important that everyone ensures that the Group operates within the applicable laws and regulations concerning political donations and adheres to the Group's policies and procedures.

### Integrity of the Group's Financial Records and Public Reports

#### We will properly maintain our Group's books and records.

The books and records of the Group must accurately reflect the nature of the underlying transactions and no undisclosed or unrecorded liabilities or assets shall be established or maintained. Books and records must be maintained in all respects according to law and the accounting principles, policies and procedures that the Group has adopted.



#### Care Enough to Coach

*At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Did I do the right thing?*

*Expenses must be recorded in the period in which they are incurred (even if an invoice has not yet been received) and should not be recorded in advance. Because the work was not started, this would be a misrepresentation and, depending on the circumstances, could amount to fraud. Your manager should never ask you to record things which are not accurate. Raise this to management or through the Indivior EthicsLine right away.*





## Taxation

### We will comply with applicable tax laws and regulations.

All the countries in which the Group operates have laws and regulations concerning taxation and it is essential that we comply with these laws at all times.

Management of the Group's taxation affairs is the responsibility of the Finance, Legal and Governance teams. All communications and dealings with the taxation authorities should be addressed and referred to these departments.

You should contact your line manager in the first instance, if you suspect that the Group has or is about to breach its own policies and procedures or any applicable laws concerning taxation. These instances may also be referred to the Finance, Legal or Governance teams or reported confidentially to the Indivior EthicsLine.

## Competition/Antitrust Laws and Sanctions

### We will compete fairly.

The Group is required to adhere to a variety of local, national and international laws and regulations concerning antitrust and competition matters. It is also required to adhere to similar requirements concerning sanctions. Competition and antitrust laws require the Group to conduct its competitive activities fairly and prevent the Group from gaining an unfair advantage through conducting unethical and illegal activities. These might include colluding with competitors to fix prices and operating a cartel. Other examples are the dissemination of deceptive and misleading information about competitors and improperly sharing confidential and proprietary information about them.

Sanctions are put in place to prevent individuals or companies from conducting business transactions. They can be put in place for a variety of reasons such as preventing illegal activity and inhibiting acts of war and terrorism. Sanctions are sometimes politically motivated and can be put in place nationally or internationally (for example, by the United Nations).

It is essential that the Group and its Workforce members adhere to these requirements at all times. Not doing so risks serious financial and reputational consequences and criminal penalties against the Group and its Workforce members. It is important that all Workforce members, students, interns, contractors and consultants globally report any suspected or actual breaches of these requirements to their line manager, the Group's Legal Department or confidentially to the Indivior EthicsLine.

We will not share confidential and proprietary information with competitors, suppliers or other third parties in a way that improperly influences them or their activities.



### 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 our Group.*



## COMPLIANCE WITH THIS CODE

All members of the Board, Workforce members, students, interns, contractors and consultants are required to comply with this Code. It is the responsibility of the Board to ensure, so far as is reasonably practicable, that the principles and ethical values embodied in this Code are communicated to all Workforce members of the Group.

Members of the Board, Workforce members, students, interns, contractors and consultants must comply with any rules set out in this Code. Breach of any of the principles within the Code may result in disciplinary action. A serious breach – such as if you are found to be in wanton breach of the Code and your actions cause reputational risk or damage and/or financial loss to the business – may amount to gross misconduct. This may result in summary dismissal and contract cessation. Fines to a Group Company will impact on the profit and loss and performance payments of that 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 comes to light.

You will be required to certify, annually, that you understand the Code and that you (and those you supervise who do not have an Indivior email address) are in full compliance with this Code for the operations for which you have responsibility. On an annual basis by Internal Audit Services, the Board monitors the findings of this certification. Those who do not have an Indivior email address will have the Code communicated to them. Those that supervise these Workforce members will be required to sign that these groups are in full compliance with the Code.

The Board will not criticize management for any loss of business resulting from adherence to this Code. Indivior undertakes that no Workforce member, student, intern, contractor or consultant globally will suffer as a consequence of bringing to the attention of the Board or senior management a known or suspected breach of this Code nor will any Workforce member, student, intern, contractor or consultant globally suffer any adverse employment or contract decision for abiding by this Code.

