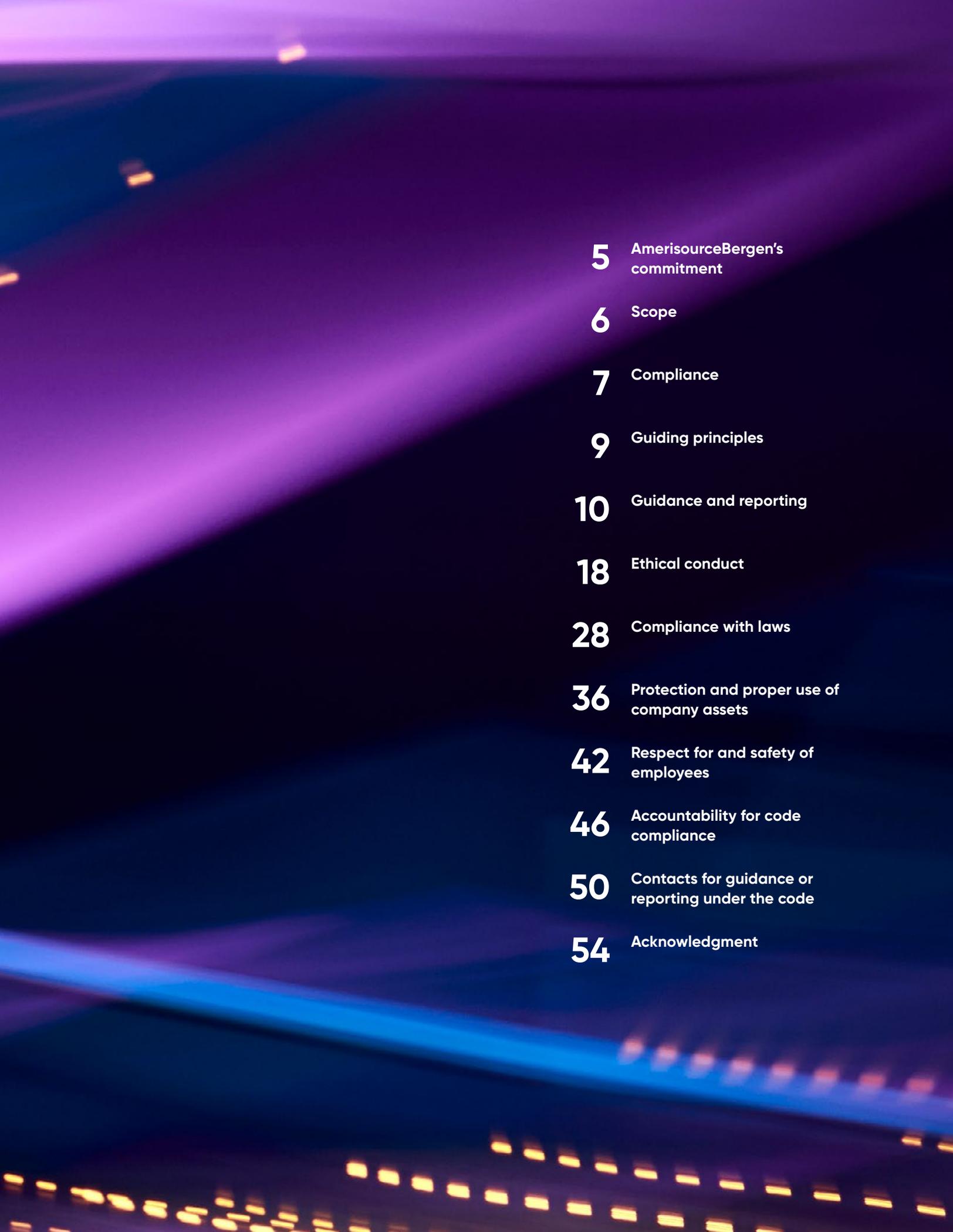


Code of ethics
and business
conduct

About this Code

The Code is intended as a general guide for performing our duties and activities in accordance with sound ethical principles.



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Our commitment

AmerisourceBergen (the Company) is committed to the sound management principle that all business dealings shall be conducted with the highest level of business ethics, honesty, and integrity. This Code of Ethics and Business Conduct (the Code) reaffirms the Company's longstanding commitment to that principle and to maintaining and promoting a culture of compliance. The Code sets forth our standards for business ethics, which have been approved and are supported by our Board of Directors and management. The Code embodies our Company values of integrity and accountability and enables us to execute against our shared responsibility to create healthier futures.

One of the Company's most important assets is its reputation for accountability, integrity, and honesty in dealing with customers, suppliers, and regulatory entities. Our customers, suppliers and other stakeholders expect nothing less than always being treated fairly and with honesty. Every one of us has a responsibility to be aware of the necessity of conducting all business transactions with the highest standards of integrity and accountability. And each of us contributes to creating a culture of compliance at AmerisourceBergen.

This Code provides guiding principles to enable each of us to make appropriate decisions when we encounter ethical issues at work. The Code is the framework for what we stand for and how we operate. The Code is updated annually to reflect new developments in policies, laws, and regulations and to ensure that our Code aligns with our business activities and structure. The Code highlights the role that compliance with laws, regulations and policies and procedures plays in creating our culture of integrity, which is the foundation for high performance among our team members and enables AmerisourceBergen to effectively support the customers and the patients we ultimately serve.

I encourage all AmerisourceBergen team members to read the Code carefully to be sure that you understand your obligations. The Company has a zero-tolerance policy for ethical violations. If you have any questions after reading the Code or during your day-to-day activities, please contact one of the resources identified in this Code.

I also urge our team members to speak up and raise a question if you have a concern about unethical, irresponsible, or potentially illegal activities. Speak up to report wrongdoing, misconduct, or behavior conflicting with our Code of Ethics or AmerisourceBergen policies. At AmerisourceBergen, we have a strict non-retaliation policy, and we do not tolerate retaliation against any team member who reports a potential violation in good faith.

Thank you for your continued commitment to compliance and for all that you do every day. Your support is integral to the ongoing success of our Company and the strength of our shared commitment to compliance and ethical decision-making as we pursue our shared purpose.



Steve Collis

Chairman, President & Chief Executive Officer



Scope

As one of the world's largest pharmaceutical services companies, AmerisourceBergen, including its subsidiaries and affiliates (the Company), is committed to executing its business objectives with the highest ethical standards and to complying with all applicable laws, regulations, and rules. As part of this commitment, the Company has adopted this Code of Ethics and Business Conduct.

All Company directors, officers, and employees (referred to simply as "employees" in this Code) are expected to understand and adhere to the legal standards and ethical principles established in this Code, to conduct themselves with the highest degree of integrity and honesty, and to comply with all applicable laws, regulations, and rules.

The Code is intended as a general guide for performing your duties and activities in accordance with sound ethical principles and in compliance with all applicable laws. The Code is reviewed annually and updated as necessary to ensure it continues to align with the Company's business practices and procedures.

The Code cannot address every ethical issue that might arise during our business activities. You are expected to seek guidance from your supervisor or one of the compliance resources identified below when you need additional assistance understanding your ethical obligations.

In addition to complying with the Code, employees must comply with additional Company policies, procedures, and other guidance as applicable.

Furthermore, each operating company, business unit or department of the Company may have additional policies and procedures that further clarify your ethical and legal obligations.

From time to time, you will receive compliance training related to certain aspects of the Code and other Company policies and procedures.

In 2018, AmerisourceBergen entered into a Corporate Integrity Agreement with the Office of Inspector General of the U.S. Department of Health and Human Services. The Corporate Integrity Agreement outlines certain reporting requirements, review procedures and other conditions with which AmerisourceBergen must comply as part of its settlement with the U.S. Department of Health and Human Services and provides a roadmap for continuous improvement of the Company's compliance program. At hire and annually, you will receive training that specifically outlines the requirements for each relevant employee under the Corporate Integrity Agreement and the Company's compliance program.

The Code is not intended to and does not create a contract of employment or assurance of continued employment.



Guiding principles

The Code reflects the Company's commitment to our shared purpose: **We are united in our responsibility to create healthier futures.** In fulfilling this purpose, we are guided by these principles:

Put people first.

We prioritize the health and well-being of people both inside and outside AmerisourceBergen.

- enable team members to excel and build rewarding careers
- listen and make sure others feel heard
- connect with customers and partners personally and authentically
- operate with the customer and patient in mind

Be part of the solution

Everyone is encouraged to bring forward new ideas.

- be ready to experiment and create
- have a bias for action over complacency
- embrace progress
- know that our most powerful ideas happen when we are united

Celebrate individuality. Act together.

We value everyone's contribution as we strive to achieve shared goals under a singular purpose.

- seek diverse, global perspectives
- eliminate silos
- give everyone a forum to contribute
- foster collaboration

Think big. Be humble.

We seek to innovate and solve new problems knowing that success isn't guaranteed, nor taken for granted.

- have confidence in our capacity to succeed
- appreciate the importance and privilege of our work
- take informed, calculated risks
- accept failures and move on

Tell the truth. Tell it fast.

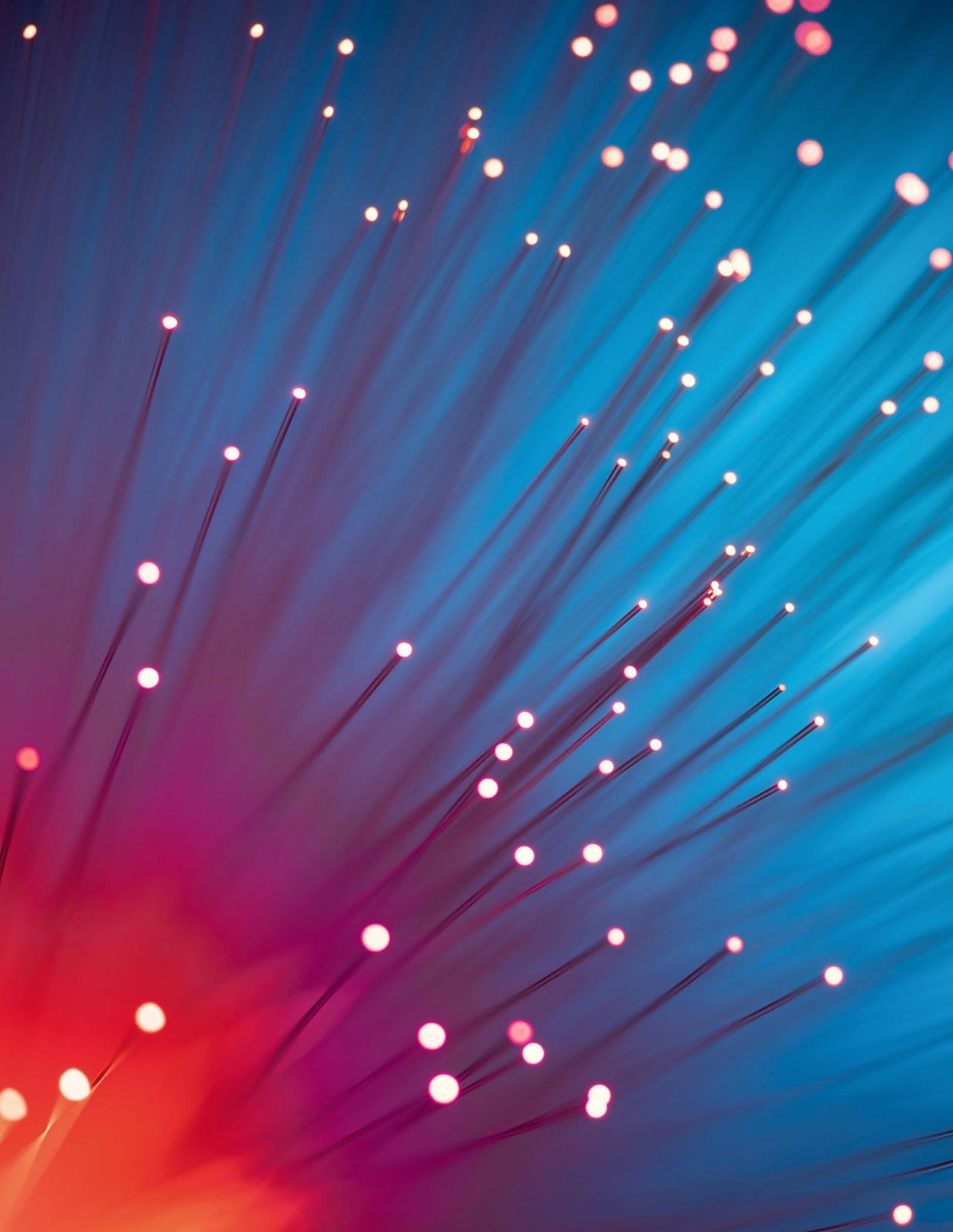
We operate with transparency and respect in all aspects of our work.

- communicate openly and honestly
- be accountable for your actions
- be willing to have difficult conversations
- own mistakes and move forward with empathy and grace

Unite around our customers.

Our vital role in healthcare requires every team member to operate with the customer and patient in mind.

- recognize we all impact the customer
- understand the urgency and importance of customers' needs
- know any moment, big or small, can make a difference



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Guidance and reporting

Every employee is expected to follow these key principles of ethical conduct. To ensure that the Company continues to operate in accordance with the Code and in compliance with all applicable laws, the Company requires that every employee promptly report to the Company any suspected violation of the Code, the laws, regulations and rules applicable to the Company or Company policy.

There are many ways to raise ethical concerns to the Company. AmerisourceBergen's compliance program is operated to ensure that no punishment or retaliation occurs against any employee for raising an ethical concern in good faith.

If you have a question about the Code, Company policies, procedures, and other guidance, need help on how to comply with them in a given situation, have concerns about any aspect of Company operations, or become aware of any actual or suspected improper activities or violations of the Code or other Company policies, you should promptly contact any of the following resources:

- Your Supervisor
- Your local Group Compliance Officer / Lead or local legal team
- The VP, International Compliance and Ethics, Alliance Healthcare
- The Chief Compliance Officer
- The Assistant General Counsel
- The Office of Compliance
- The Chief Legal Officer

A list of the current Group Compliance Officers and Compliance Representatives for all AmerisourceBergen business units is posted to the Office of Compliance Portlet of myAB or contact OOC@amerisourcebergen.com for a list of these individuals.

You can reach the Chief Compliance Officer:

Jennifer Dubas
SVP and Chief Compliance Officer
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7329
jdubas@amerisourcebergen.com

You can reach the Chief Legal Officer:

Elizabeth Campbell
Chief Legal Officer
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7404
ecampbell@amerisourcebergen.com

You can reach the compliance counsel:

Andrew Schinze
Assistant General Counsel
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7443
aschinsel@amerisourcebergen.com

Anonymous inquiries and reporting

The Company also makes available a reporting hotline 24 hours a day, 7 days a week. The hotline is currently called “the Network” provided through EthicsPOINT, a third party which manages the hotline. You can make anonymous reports or inquiries about ethical matters by contacting:

Telephone reporting

AmerisourceBergen by country hotline phone numbers

| | | | | | |
|----------------|-----------------------|-------------|------------------|-----------------|-----------------------|
| United States | 1.855.214.1479 | | | | |
| Argentina | 0.800.345.3121 | Greece | 800.848.1693 | Poland | 800.005.040 |
| Australia | 1.800.961.479 | Hong Kong | 800.963.987 | Portugal | 800.180.750 |
| Austria | 0800.232959 | Hungary | 80.088.476 | Romania | 0800.360.159 |
| Belgium | 0800.76.276 | India | 000.800.919.1226 | Russia | 8.800.100.63.45 |
| Brazil | 0800.047.4581 | Ireland | 1800851273 | Serbia | Online reporting only |
| Bulgaria | 080046249 | Israel | 1-809-399-871 | Singapore | 800.852.6921 |
| Canada | 1.855.214.1479 | Italy | 800.729.258 | Slovak Republic | 0800.002.632 |
| Chile | 800.914.302 | Japan | 0800.500.5703 | Slovenia | Online reporting only |
| China | 400.120.0546 | Kenya | 0800.211.225 | South Africa | 080.098.8815 |
| Columbia | 01.800.5190402 | Korea | 080.880.0362 | Spain | 900.998.491 |
| Croatia | 0800.790.011 | Lithuania | 8.800.00.314 | Sweden | 020.12.70.35 |
| Czech Republic | 800.810.924 | Malaysia | 1-800-81-2630 | Switzerland | 0800 225 153 |
| Denmark | 80.83.02.60 | Mexico | 800.681.9279 | Taiwan | 00801.49.1609 |
| Ecuador | 1-999-119 | Netherlands | 0800.0227093 | Thailand | 1800014575 |
| Egypt | Online reporting only | New Zealand | 0800.633.145 | Turkey | 0800 621 2383 |
| Finland | 0800.412008 | Norway | 800 62 319 | Ukraine | 0800.801.419 |
| France | 0.800.90.94.74 | Peru | 0800.78126 | United Kingdom | 0808.234.1086 |
| Germany | 0800.1819284 | Philippines | 1800.1.322.0345 | Uruguay | 000.413.598.3951 |

Online reporting

www.amerisourcebergen.ethicspoint.com

This hotline provides the opportunity to anonymously report incidents involving actual or suspected improper, illegal, or discriminatory conduct (e.g., fraud, theft, discrimination, violations of compliance policies, safety programs, or regulations including those issued by the US Food and Drug Administration (FDA), the Drug Enforcement Agency (DEA), or government healthcare program requirements, antitrust concerns, and violations of the workplace violence policy or violations of the non-retaliation policy). The identity of anyone who contacts EthicsPOINT and requests anonymity is never known unless the caller wishes to be known.

Each caller is given the opportunity to call back to check on the status of their report. The EthicsPOINT portal also can be used to assist you with questions or concerns about the Code and how it applies to your daily activities.

Investigating and responding to reports

AmerisourceBergen takes ethics and compliance concerns seriously. All reports of potential violations of this Code, Company policy and procedures or applicable laws and regulations are fully and confidentially investigated in a timely manner. All employees must cooperate with any investigation or audit conducted or directed by the Company. The Company may take disciplinary action against you if it is determined that you failed to cooperate in an investigation, including lying during an investigation.

In some countries there may be a specific regulation regarding the investigation procedure for an internal report that may be applicable. In case of doubt, please contact your Local Compliance Officer/Lead or local legal team.

If an investigation substantiates a suspected violation of this Code, Company policy and procedures, or applicable laws and regulations, the Company will take appropriate corrective and disciplinary actions.

AmerisourceBergen has an Auditing, Monitoring, and Risk Assessment process that ensures we assess the effectiveness of the AmerisourceBergen Compliance Program in relationship to risks identified, effectiveness of mitigation efforts, and remediation plans. The Chief Compliance Officer periodically evaluates the effectiveness of the Compliance Program, approves an audit plan, and allocates resources to audit compliance risks and operational compliance across AmerisourceBergen.

Non-retaliation / whistleblower protection

Company policy prohibits retaliation against employees who in good faith report to the Company known or suspected violations of applicable law, regulations, Company policy or this Code. A "good faith" report means that you have provided all the relevant information that you have about the matter, and you believe it to be true. Company policy also prohibits retaliation against anyone for participating in good faith in investigations by the Company of ethics or compliance concerns.

Any employee of the Company who receives a report of a violation of the law, Company policy or procedures, or this Code is responsible for ensuring that the report is handled properly and that the person making the report is treated fairly in the process.

This obligation applies with respect to anonymous reports as well. All individuals responsible for investigating a report that has been made through EthicsPOINT are advised that it is against Company policy to retaliate against the reporting person for making a good faith report, should the person's identity be revealed during the investigation.

Allegations of impermissible retaliation will be investigated, and appropriate corrective action will be taken if the allegations are substantiated. This may include disciplinary action up to and including termination of those responsible for retaliation.

If you believe that you or someone you know has been retaliated against for raising in good faith an ethics or compliance concern or reporting a known or suspected violation of law, Company policy, or procedure of this Code, contact your local Compliance Officer/Lead, local legal team, the Chief Compliance Officer, the Assistant General Counsel, Chief Legal Officer, or the EthicsPOINT portal.

The Company takes its responsibility to prevent retaliation against any whistleblower or other person reporting a suspected violation very seriously because the Company mandates that every officer and employee promptly report to the Company any suspected violation of the Code, Company policy or procedures, or the law. Concern about retaliation does not negate your duty to report a suspected violation to the Company.

Members of management have additional responsibilities

Performing honestly and with integrity is an obligation we all share. Members of management are expected to lead by example and act as role models. As a manager you must: create a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation; encourage ethical conduct and compliance with the law by personally leading compliance efforts; consider compliance efforts when evaluating and rewarding employees; and ensure that employees understand that business results are never more important than ethical conduct and compliance with AmerisourceBergen policies.

You must also strive to create a positive work environment where employees feel comfortable asking for help and raising concerns about this Code, Company policies, or the law. You must be alert to any situations or actions that may violate the letter or spirit of the Code or Company policy or that may damage the Company's reputation. It is important that, as a member of management, you take immediate action to address such situations. As a manager, you must:

- Ensure the employees you supervise understand their responsibilities under the Code, Company policies, and the law.
- Discuss the Code with your employees and reinforce the importance of ethical conduct, compliance with the Code, Company policy, and the law.
- Make sure your employees know they can come to you with questions and concerns, without fear of retaliation, and that you'll listen and respond appropriately.
- Never ignore any type of misconduct or retaliation against an employee.
- Never retaliate against an employee for raising questions or issues, in good faith, to those outside their chain of command or by utilizing the company hotline.
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code, Company policy, or the law.
- Always act to stop violations of the Code, Company policy or the law by those supervised.
- Provide advice and guidance on interpreting the Code and promote the requirements of the Code.

As a manager, if you are approached with a question or concern related to the Code or Company policy, listen carefully, and give the employee your complete attention. Ask for clarification and additional information. Answer any questions if you can, but do not feel that you must give an immediate response. Contact your local Compliance Officer/Lead, the Office of Compliance or submit the concern via EthicsPOINT if you need additional guidance.

What happens if you violate our code?

To maintain the highest standards of integrity, we must commit ourselves to complying with our Code, Company policy and procedures, and applicable laws and regulations. Violations of our Code not only damage AmerisourceBergen's standing in the communities we serve – they may also be illegal. AmerisourceBergen will take the appropriate disciplinary or corrective action in response to each case, up to and including dismissal. In addition, employees involved may be subject to government fines or personal criminal or civil liability.



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Ethical conduct

Avoid and report fraud

Company policy prohibits fraudulent activity in any form. Fraud can take many forms but at its heart involves intentional deceit. In addition to being unethical and a violation of this Code, fraudulent activity is usually unlawful and subjects the violator to possible civil and/or criminal liability. Fraud can include, but is not limited to:

- Misappropriating Company assets.
- Embezzling or committing forgery.
- Unauthorized handling or reporting of Company transactions not in conformance with generally accepted accounting principles.
- Inaccurately and knowingly confirming that the Company's control environment is operating effectively in conformance with Sarbanes-Oxley regulations if it is not.
- Falsifying Company business records or financial statements.
- Paying kickbacks to customers or potential referral sources to influence the use of prescription drugs distributed by a Company business unit.

Any substantiated acts of fraud will result in serious disciplinary action, up to and including dismissal of the employee(s) involved in the transaction and possible criminal prosecution.

Pursue fair dealing

Employees shall deal fairly with the Company's customers, suppliers, competitors, and each other. No employee shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Employees must be careful to avoid making any false, misleading, or disparaging statements about our competitors.

Employees are expected to comply with the applicable antitrust and competition laws in the countries in which the Company conducts its business. If your job involves sales, marketing, promotion, procurement, or sourcing, it's important that you understand how antitrust and competition laws affect your day-to-day work and avoid conduct that might even suggest a violation.

Competition laws can be challenging to grasp, and violations carry serious penalties—both civil and criminal—for the employees involved and AmerisourceBergen. If your job involves sales, marketing, promotion, procurement, or sourcing, you must become familiar with and understand these laws as they apply to your work. For more information or questions about the specific rules that apply to your business, please contact AmerisourceBergen's Chief Legal Officer, the Chief Compliance Officer, the Compliance Officer/Lead, or Legal team that supports your business.

Avoid conflicts of interests

To uphold AmerisourceBergen's reputation, we must be alert to any situations that may create a conflict of interest, whether real or perceived. Every employee must avoid any situation that could impair the employee's ability to make objective decisions on behalf of the Company or that has the appearance of creating a possible conflict between the Company's interests and their personal interests. By way of example, no employee shall take any action which would (i) directly or indirectly be in competition, or appear to be in competition, or foster competition with the business interests of the Company; (ii) interfere with the contractual relations of the Company through personal business activities; or (iii) diminish or disparage the reputation of the Company. Because the Company does business with many government entities, the Company is subject to strict laws and regulations prohibiting lobbying and other activities with government employees and officials that may create a conflict of interest.

Conflicts of interest could include:

- Serving as an officer or director of or having an ownership interest in another company that does business or competes with AmerisourceBergen.
- Maintaining a personal interest in any transaction involving the Company or its subsidiaries which may impair the objective and impartial representation of the Company by the employee.
- Speculating or dealing in goods, commodities or products required, dealt in, or sold by the Company.
- Having a family member that has an ownership interest in another company that does business or competes with AmerisourceBergen.
- Using AmerisourceBergen information for your own personal gain, to benefit a family member or another company for which you serve as an officer or director, or in which you have a financial interest.
- Participating in business transactions for your own personal gain based on information or relationships developed as an AmerisourceBergen employee.
- Failing to disclose that you are closely related to someone, such as a vendor or customer, who has sought or is seeking a financial arrangement with AmerisourceBergen.
- Having a personal business relationship with a commercial entity that administers or delivers healthcare benefits (for programs such as Medicare/Medicaid in the U.S. and National Health Service (NHS) in the U.K.) which may include producing, marketing, reselling, distributing, or providing healthcare related products and/or services.
- Having served as an employee of a government agency or having a close relative who currently is or has been an employee of a government agency.

Avoid related business interests

Except for ownership of publicly traded securities (and, in the case of a director, service on another board of directors), employees are prohibited from having any personal financial interest in any individual or business organization that furnishes merchandise, supplies, property or services to the Company. This includes arrangements to receive loans (other than bank loans), commissions, royalties, property, shares, or anything of value from such entities.

Employees are further prohibited, without the prior consent of the Company, from conducting Company business with a business organization in which a close relative of the employee has an ownership interest of greater than 5%.

Employees with procurement responsibilities, including buying, selling, or leasing materials or services on behalf of the Company, must pay particular attention to relationships with suppliers, dealers, and distributors, and should disclose any personal or family relationships with such entities to the Office of Compliance utilizing the appropriate electronic Conflict of Interest form on the EthicsPoint portal.

Other Employment

Officers and employees shall not, without the prior written consent of the Company, accept employment outside the Company or agree to serve on a Board of Directors (or a similar outside position) that could pose a conflict of interest to their responsibilities to the Company. Other employment or service on a Board of an outside entity might pose a conflict of interest if, by taking the employment and/or committing to a Board membership, you would not be able to dedicate the necessary time and attention to your AmerisourceBergen job, you are directly competing with AmerisourceBergen, or you are using the assets or confidential information of AmerisourceBergen for the benefit of that outside activity.

Requests for approval of outside employment or Board Membership that could pose a conflict of interest should be submitted on the appropriate Approval Form via EthicsPOINT.

Outside employment that does not pose a conflict of interest must still be approved by your manager, but an approval form need not be submitted to the Office of Compliance in such situations. Questions about that constitutes a conflict of interest can be raised with our manager or with the Office of Compliance.

Marketing practices: truthful and accurate promotion

An important component of AmerisourceBergen's longstanding commitment to operate our business with ethics and integrity is the accuracy and truthfulness of our marketing materials and other communications. All AmerisourceBergen marketing materials and communications will comply with the following standards:

- Represent yourself and AmerisourceBergen with integrity and protect our reputation as an ethical and trustworthy organization.
- Only make truthful, accurate, and not misleading statements about AmerisourceBergen's goods, services, and pricing.
- Any claims must be properly supported by appropriate medical, scientific, or other evidence.
- Promote the benefits of AmerisourceBergen products or services and never disparage or make false or misleading statements about AmerisourceBergen's competitors.
- Do not use misleading, unfair, or unsupportable comparative advertising.
- Never seek to improperly interfere with the integrity of the relationship between patients and healthcare providers and the independence of the healthcare decisions made by those providers.

All company marketing materials must comply with the requirements of this Code, and all other applicable company policies, as well as all applicable laws and regulations.

Gifts, meals and other hospitality

Gift exchange with customers/suppliers

The Company and its employees may not offer or provide gifts or other incentives to improperly influence relationships or business outcomes. Employees shall not offer, seek, or accept personal gain, directly or indirectly, from anyone seeking or doing business with the Company in exchange for purchasing, recommending, or arranging for the purchase of products or services, or for a commitment to continue to purchase products or services. Giving or receiving cash payments or cash equivalents (such as gift cards or gift certificates) is prohibited.

Business meals and hospitality

Except for restrictions described below that apply when dealing with government employees and/or healthcare professionals, and in accordance with the applicable requirements of any applicable business unit specific policies and procedures, employees may pay for or receive reasonable business-related meals, refreshments, and/or entertainment for or from customers and suppliers that are:

- Incurred only occasionally.
- Not requested or solicited by the customer, supplier, or employee.
- Not intended to or could not reasonably be perceived as affecting business decisions.
- In a setting and of a nature that is conducive to business discussion and not lavish, excessive or inappropriate.

Employees should direct any questions about whether business meals or hospitality offerings are permissible under this Code and applicable AmerisourceBergen policies to their local Compliance Officer/Lead.

Gift exchange, business meals and business hospitality with healthcare professionals

Employees may provide business meals and other business hospitality to healthcare professionals, including purchasing officers of non-government-owned hospitals or pharmacies, only under limited circumstances and in accordance with the applicable business unit specific policies and procedures. Employees may not provide gifts to healthcare providers or members of their staff unless those gifts are designed to commemorate a Significant Life Event, complies with the applicable requirements of any business unit specific policy and procedure, and is approved in advance by the Office of Compliance. Employees may occasionally provide healthcare professionals with an item that is solely relevant to the practice of medicine or pharmacy that is inexpensive, reasonable and has been approved by the Office of Compliance. In addition, in planning or organizing any Continuing Medical Education or other similar seminar or training session for healthcare professionals, employees must comply with applicable business unit specific policies and procedures, and should contact the Legal Department, the Office of Compliance, and/or the relevant local Compliance Officer/Lead for guidance to ensure that the activities comply with all applicable industry guidelines.

Gift exchange, business meals and business hospitality with government employees

Providing hospitality to government officials by employees is strictly regulated by laws, regulations, and rules. AmerisourceBergen policy prohibits giving of gifts or hospitality to government officials without prior notice and approval by the Office of Compliance. The prior approval process, and other information about appropriate dealings with government officials, is outlined in applicable business unit policies and procedures. For additional guidance on this important topic, contact your local Compliance Officer/Lead or local Legal team.

Donations and sponsorships

Donations, customer/industry sponsorships, raffle prizes and giveaways have certain tax implications and legal/regulatory restrictions, and these must be made in accordance with applicable business unit policies and procedures. Sponsorship of appropriate industry-related commercial events must be approved by your manager and must not conflict with this Code. Industry sponsorships that could be perceived as a potential conflict of interest, or that may conflict with any other requirement of this Code, should be submitted to the Office of Compliance for review by using the general disclosure of Conflict of Interest form. When in doubt, contact the Office of Compliance at OOC@amerisourcebergen.com.

Q: My business unit would like to sponsor a charity event organized by one of our customers. Do we need to seek approval from the Office of Compliance?

A: Yes. Sponsorships of customer or industry-related events that could be perceived as potential conflicts of interest or that may conflict with the requirements of this Code or other AmerisourceBergen policies, must be reviewed and approved prior to a commitment to the sponsorship by the Office of Compliance and by AmerisourceBergen's Corporate Citizenship organization.

Gifts to company personnel from the company

All service anniversary gifts and performance-based rewards or recognition are managed through True Blue, AmerisourceBergen's comprehensive recognition program accessible on the myHR portal. In specific businesses or geographies where the True Blue program is not available, local programs may be used instead. Items processed through True Blue, or any local alternative program, will require management approval but will not require approval from the Office of Compliance.

Gifts, favors, and payments for events may be given to employees at the Company's expense if they comply with business unit specific policies and procedures. Gifts to Company personnel must comply with applicable law and the standards of conduct set forth in this Code.

Questions about the appropriate exchange of gifts or other benefits among Company employees should be addressed with your supervisor.

Q: I'd like to give an employee on my team an iPad as recognition for their performance last month. Do I need to submit a Code of Ethics Approval – Gifts e-form?

A: There are two parts to this question. First, the iPad is not a "gift" because it is being given to the employee as recognition for performance. It is a form of compensation. Second, performance-based rewards and recognition should be managed through True Blue or the relevant local procedure where True Blue is not available.

Contributions to political parties or candidates

Under no circumstance will the Company directly or indirectly require that employees contribute to AmerisourceBergen's Political Action Committee, political parties, or candidates for public office.

AmerisourceBergen encourages employees to participate in the political process in an individual capacity, but personal political activity must occur in your own time and at your own expense. It is essential that you do not give the impression that you are acting on behalf of or otherwise representing the Company when conducting personal political activity. Employees may not use Company property or time to engage in personal political activity.

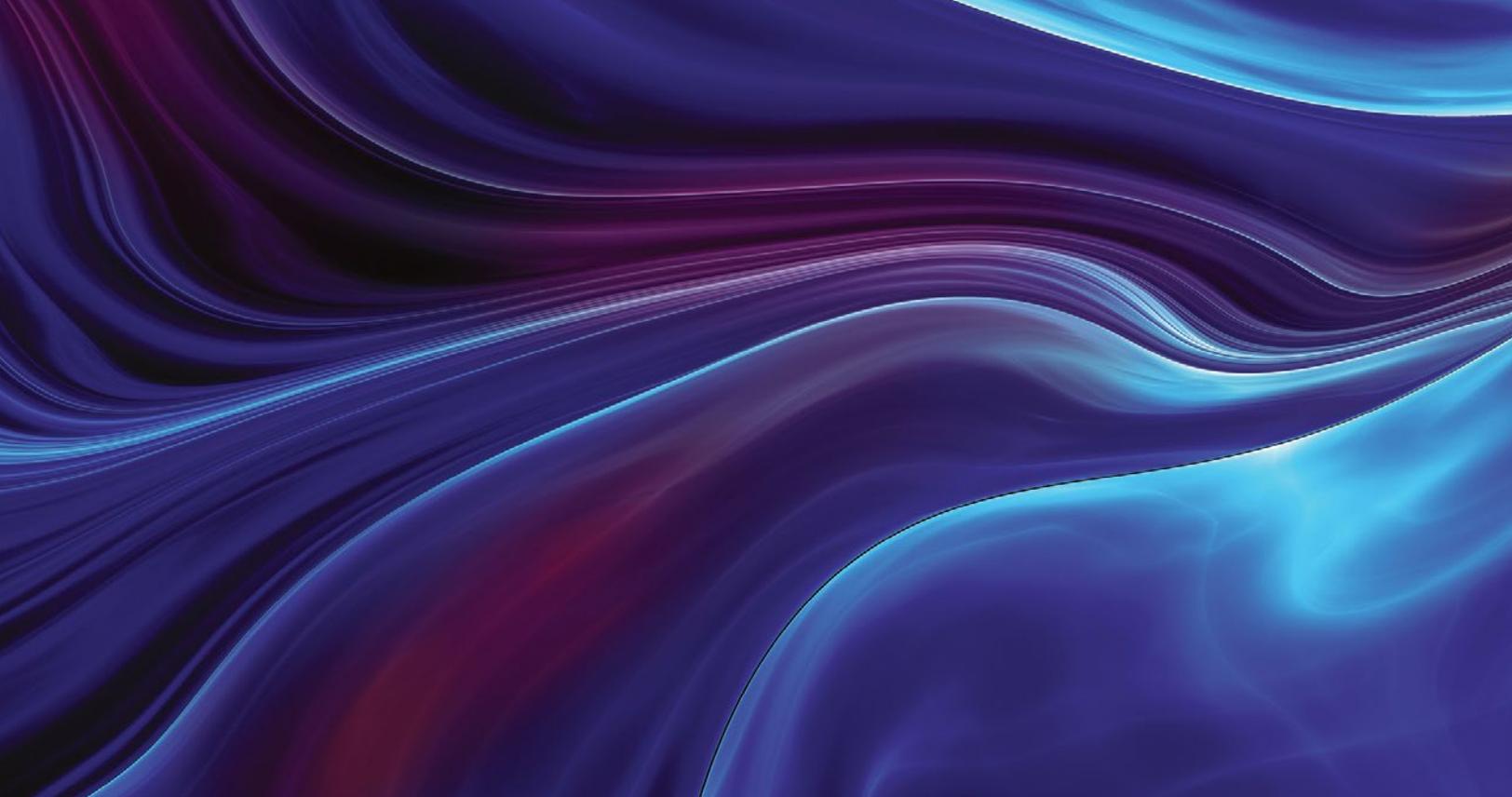
Government contracting

The Company conducts business with many government entities, officials, and employees, including U.S. federal, state and local government agencies and hospitals. The Company also transacts business with government agencies, officials, and employees in countries other than the United States. Given the dual role of governments as both regulators and customers of the Company's business, it is critical that employees adhere to the various laws, regulations, and principles applicable to government contracting in the relevant location.

Special rules and regulations apply when doing business with U.S. federal, state, local, and international government agencies and officials, so you should take extra steps to understand and comply with the requirements of the agency from which you are soliciting business.

When dealing with government officials and employees, avoid any conflicts of interest or conduct that could appear improper. Any attempts, even if well intended, to influence a government official or employee by means of payments, gifts, or other favors are prohibited under the laws of many countries, including the U.K. Bribery Act and U.S. anti-bribery and anti-corruption law as discussed in this Code. In addition, as discussed in more detail later in this Code, you cannot offer anything of value to any person or entity to induce them to purchase, recommend the purchase of, or make a referral for any type of healthcare goods or services for which payment may be paid, in whole or in part, by Medicare, Medicaid, or a similar government healthcare payment program in the U.S. or another country.

You also must ensure that your records of business dealings with government agencies and entities are complete and accurate, and that you do not submit inaccurate or other improper claims for payment to the government or cause the Company to do so.



Failure to comply with these laws, regulations, and principles could subject the Company and individual employees to administrative, civil, or even criminal fines and penalties. In addition, violation of the fraud and abuse laws could result in the exclusion of the Company or individual employees from participation in U.S. federal healthcare programs or similar programs in other countries.

If you have questions about the proper procedures to follow in interacting or contracting with government agencies or entities, you should contact the Chief Compliance Officer and/or Assistant General Counsel.

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Compliance with laws

Employees must comply with all applicable laws, regulations and rules, including but not limited to those described below.

Fraud and abuse laws

In the United States, both federal and state laws generally prohibit offering or providing anything of value to a person or entity to induce them to purchase, recommend the purchase of, or make a referral for any type of healthcare goods or services for which payment may be paid, in whole or in part, by Medicare, Medicaid or another U.S. federal healthcare program. In many U.S. states, this prohibition also extends to healthcare goods or services that are reimbursed by commercial insurers or by the patient. There are similar laws in other countries that prohibit transfers of value to physicians, pharmacists, or other individuals or entities to induce or reward the referral of healthcare goods or services. Such payments are sometimes called “kickbacks.” Examples of payments or other transfers of value that may be considered unlawful kickbacks under the laws of the U.S. and other countries include:

- Upfront cash payments
- Free products and services
- Reimbursement of personnel costs
- Gifts, entertainment/hospitality or lavish meals

U.S. federal law also prohibits making or causing others to make false or fraudulent claims for payment under government programs such as Medicare. Violations of U.S. anti-kickback and false claims laws may result in severe punishment, including civil and criminal sanctions for the Company and the individual involved, and potential exclusion from U.S. federal healthcare programs. There are similar sanctions that may apply to violations of anti-kickback and false claims laws in other countries.

The general prohibition under the U.S. federal anti-kickback statute on offering incentives to customers and suppliers does not apply to offering appropriate rebates or other discounts that comply with the requirements of the Discount Safe Harbor and any other applicable laws or regulations. Discounts and rebates are permissible under the Discount Safe Harbor if they are clearly identified, and the customer is made aware of its obligation to account for and properly report any discounts in accordance with the reporting requirements of the fraud and abuse laws. You must contact the Company lawyer assigned to your subsidiary or operating group before proposing any such rebate or discount arrangements to ensure that the proposal is legally permissible.

In other countries where AmerisourceBergen does business there may be similar types of restrictions and laws on rebates or discounts; contact your country Compliance representative for specific country details.

Anti-Bribery and Anti-Corruption laws

AmerisourceBergen prohibits bribes, kickbacks, or corruption in any form. No employee or anyone acting on an employee's behalf may offer, pay, request, or accept bribes, kickbacks, or improper gratuities of any kind to or from any individual, whether that individual is a government official or a private party. AmerisourceBergen prohibits its employees from engaging in money laundering or other improper use of currency. This prohibition on bribes, kickbacks, and corrupt activities including money laundering applies regardless of differing business cultures and traditions in the various locations where AmerisourceBergen conducts business.

The laws of the United States (through the U.S. Foreign Corrupt Practices Act), the United Kingdom (through the U.K. Bribery Act 2010) and other countries prohibit directly or indirectly giving anything of value to government officials or private parties to gain an improper business advantage. A bribe or kickback can take many forms, including cash payments, gifts, expensive meals, or other favors such as providing free services to an individual in exchange for a favorable business decision. As part of its commitment to ethical business practices, AmerisourceBergen prohibits its employees from offering, authorizing, providing, or promising to pay bribes or kickbacks. These prohibitions apply equally to agents, consultants, and independent contractors acting for or on behalf of the Company. Agents, consultants, and independent contractors must abide by the Company's commitment to Anti-Bribery and Anti-Corruption compliance and will be subject to due diligence and monitoring requirements based on the level of compliance risk associated with their activities.

Violations of Anti-Bribery/Anti-Corruption laws may result in criminal prosecution and severe penalties for the Company and any employee or other person who participates in the violation. You are expected to bring any questionable practices raising bribery or corruption concerns immediately to the attention of the Chief Compliance Officer, the Chief Legal Officer or report them anonymously through the EthicsPOINT Portal. Such questionable practices would include any request from a government official for a bribe, or any unethical or illegal conduct by the Company or any employee as it relates to bribery or kickbacks. You are encouraged to seek assistance from the Office of Compliance, the Legal Department or the other available resources described in this Code if you have any question about whether a certain type of conduct is permissible under the Anti-Bribery and Anti-Corruption laws that may apply to your activities.

Antitrust and competition laws

Antitrust and competition laws prohibit efforts to limit competition between companies that otherwise would be competing for business in the marketplace. Prohibited efforts and actions include price fixing, bid rigging, and market division arrangements that unreasonably restrain trade.

You must be particularly careful when you interact with any employees or representatives of the Company's competitors. Under no circumstances should you discuss or make an agreement with a competitor regarding:

- Prices or pricing strategy
- Discounts
- Terms of the Company's customer relationships
- Sales policies
- Marketing plans
- Customer selection
- Allocating customers or market areas, or
- Contract terms and contracting strategies

Other practices not involving competitors may result in civil violations of the antitrust and competition laws depending upon their business justification and effect on competition. These practices include:

- Exclusive dealing
- Bundling/package offerings
- Resale restrictions, and
- Selective discounting

You should contact the Legal Department with any questions about the legality of practices or conduct under the antitrust and competition laws.

Human rights compliance and fair labor practices

AmerisourceBergen is committed to complying with all applicable laws and regulations related to human rights compliance, fair labor practices, and prohibiting slavery, forced labor, child labor, human trafficking, and sexual exploitation in any locality where the Company operates. AmerisourceBergen has a longstanding commitment to fundamental human rights and to improving life by creating solutions that enrich the lives of those we serve: our customers, patients, suppliers, partners, employees, and communities around the world.

The Company firmly supports and upholds the dignity and worth of each individual and the promotion of an inclusive, harmonious, and diverse work environment where employees of all backgrounds are treated with fairness, dignity, and respect. We believe in accountability, integrity, and honesty in dealing with customers, suppliers, and regulatory entities. As such, our commitment to human rights extends beyond our own operations throughout our entire value chain. Our suppliers must also uphold the human rights of workers and treat them with dignity and respect.

AmerisourceBergen is also committed to prohibiting modern slavery and human trafficking in its business and supply chain. Such prohibited coercive labor practices can take several forms, including requiring workers to pay referral fees for their employment or denying workers access to their identity or immigration documents.

Employees and anyone working on the Company's behalf (including our suppliers) should never engage in human rights abuse in the form of slavery, forced or indentured labor, corporal punishment, sexual exploitation, or child labor. The Company has adopted a Human Rights Policy which is aligned with the principles of several globally recognized standards, and which reaffirms the Company's commitment to prohibiting child labor and forced labor in all its forms, and to recognizing employee freedom of association, the right to collective bargaining, and protection from employment discrimination.

International trade control laws and sanctions

Because the Company delivers products, services, and technology to recipients in many countries around the world, the Company must adhere to various laws controlling the importation and exportation of goods. For example, it may be illegal to trade with certain countries or with individuals and entities subject to trade sanctions. Various customs laws also place restrictions of the importation and exportation of goods into certain countries. If your job involves trade with other countries, you need to be familiar with the processes and requirements that apply to your work. Each of us must be vigilant to ensure that we comply with applicable international trade laws and regulations in the countries where we do business. Consequences for violations of these laws can be severe for both AmerisourceBergen and the employees involved.

Whether a product or technology may be exported from one country to another depends on many factors, such as the nature of the item, its countries of origin and destination, and its end use and end user. The Company may be required to obtain import or export licenses and to verify the recipient's eligibility to receive any items outside the country of origin.

The Company also must comply with all applicable international trade laws and economic sanctions and embargoes, including, but not limited to:

- (i) U.S., U.K., European Union, or other restrictions on trade with Iran, Cuba, North Korea, Syria and certain other countries or regions subject to economic sanctions and embargoes.
- (ii) restrictions on doing business with individuals or entities on the Specially Designated Nationals list maintained by the U.S. government or other similar lists maintained by the U.S., U.K., or other governments; and
- (iii) restrictions on exporting certain products to countries or for end-uses or to end-users that may be prohibited under U.S., U.K., or other applicable law without required licenses.

Just as the Company is unable to trade with ineligible persons, entities, or countries, neither the Company nor any of its employees may ask a third party to take part in this activity on the Company's behalf.

The Company is prohibited from engaging in or appearing to support boycotts against certain countries or companies that are not sanctioned by the U.S. government. We may be required by law to report any request to participate in an unsanctioned boycott to various governments. For that reason, if you believe you have received an improper boycott request or have any questions about unauthorized boycott activities, it is crucial that you notify the Legal Department or the Office of Compliance immediately.

For further guidance on import and export controls, trade sanctions, embargoes, anti-boycott laws and regulations, or any other international trade law matters, please contact the Legal Department.

Insider trading

During your employment with or service to the Company, you may become aware of material information about the Company that has not been released to the public and which may be material to an investor's decision to buy or sell the Company's stock or other securities. Material, non-public information may include, for example, plans for mergers or acquisitions, marketing strategies, financial results, or other confidential business dealings.

It is the Company's policy that no employee shall (i) while in possession of material, non-public information trade in any of the Company's securities; (ii) disclose material, non-public information to others outside the Company who are unauthorized to receive such information; or (iii) recommend the purchase or sale of securities to anyone based upon material, non-public information. The Company has adopted quarterly trading blackout periods during which directors, executive officers, and certain designated employees may not buy or sell Company securities in accordance with the Company's Insider Trading Policy.

If you have any questions about a proposed sale or purchase of the Company's stock or other securities, please speak to the Chief Legal Officer or the Corporate Secretary before executing your trade.

Global data privacy and security

With the increasing digitization of employee, health, financial and other personal information, the Company's attempts to appropriately collect, secure and dispose of personal information faces far greater scrutiny from regulators, customers, and other stakeholders. In addition, legal, financial, and reputational costs of highly publicized data breaches continue to grow, so ensuring the adequacy of AmerisourceBergen's data privacy and security compliance has become a top priority throughout our global operations.

To appropriately guide and oversee AmerisourceBergen's compliance with privacy laws, regulations and best practices, the Company has established an Office of Privacy. The Office of Privacy and its associated Privacy Council are responsible for the development and implementation of a privacy compliance program designed to ensure AmerisourceBergen's compliance with applicable privacy laws and regulations – most notably, but without limitation, HIPAA and GDPR.

AmerisourceBergen is committed to protecting employees' confidential information, in accordance with applicable laws and regulations including, for example, data related to medical, family, and other personally identifiable information. The Company is also committed to safeguarding confidential information obtained from suppliers, customers, and other third parties.

Inquiries regarding data privacy/security should be directed to the Office of Privacy at privacy@amerisourcebergen.com.

Confidential patient information

Certain Company subsidiaries collect, maintain, or have access to patient information, such as medical conditions, medical history, medication history and related financial information. In the United States, you may not use, disclose or discuss patient-specific information with others where prohibited by applicable law (HIPAA and in some cases, state law) or by contractual obligations that bind us. Additional privacy laws, rules, or regulations may apply to our employees when dealing with data for patients located outside the United States. For instance, under GDPR and similar laws in the UK and other countries in which AmerisourceBergen conducts business, health information is one of the categories of personal data afforded extra protections, and additional rights are afforded to individuals with respect to their health information. You are therefore under a legal obligation to protect the patient information to which you have access, or which is in your control, in accordance with AmerisourceBergen policies and procedures.

Certain employees will receive training regarding the use of patient information as appropriate for that employee's responsibilities. For more detailed instructions regarding use, disclosure, and protection of patient information, refer to the

Company's Privacy / HIPAA Policies and Procedures or contact the Office of Privacy at privacy@amerisourcebergen.com.

Government audits and investigations

The Company's policy is to cooperate fully with all government investigations. To ensure that all government inquiries and investigations are handled in a coordinated and efficient manner, all government requests for information, audit and investigation, as well as service of subpoenas and search warrants, should be reported immediately to the Legal Department for handling.

Environmental responsibility

AmerisourceBergen is committed to protecting the health and wellbeing of our people and the planet by conducting our business in an environmentally, socially, and ethically responsible manner. Moreover, AmerisourceBergen is responsible for complying with applicable environmental laws and regulations.

As an organization we work together to build upon our commitment to being environmentally and socially responsible by supporting our employees in upholding our environmental and social goals and working with our suppliers and partners to identify opportunities for improvement. AmerisourceBergen has a particular focus on: resilient operations, climate adaptation and energy management, waste management, recycling, and sustainable packaging. For more detailed information, consult the AmerisourceBergen Global Sustainability report at www.sustainability.amerisourcebergen.com.

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Protection and proper
use of company assets

Use of company property

Every employee has a duty to protect the Company's assets and ensure that the Company's property is used for a proper business purpose for the benefit of the Company. Employees must use the Company's communications and technology resources, including telephone, email, computer, and internet systems, in an appropriate and responsible manner. Please contact Corporate IT for guidance on the appropriate use of Company property, including the Company's information technology resources and computer equipment.

Accuracy and integrity of business records

The Company is committed to creating and maintaining business records that are accurate and complete. No inaccurate or misleading entries shall be made in the books and records of the Company. Falsification of any Company record is strictly prohibited. "Off-the-books" accounts and/or "slush funds" shall not be established for any purpose. No false or misleading information shall be submitted on any invoice, billing statement, or claim submitted to a patient, customer, health care program or any other third-party payer for payment.

Any employee who has knowledge or information regarding any false entries, slush funds or fraudulent activities must immediately report them to their supervisor. If reporting to your supervisor is not appropriate or would be ineffective, or if you have any questions regarding the proper use of Company assets, books and/or records, contact the Group Compliance Officer for your subsidiary or operating group, the Chief Compliance Officer, the Assistant General Counsel or the EthicsPOINT portal.

The Company is required by law to maintain certain types of business records for specified periods of time. Failure to retain documents for the required time periods could subject the Company to penalties and fines, place the Company in contempt of court, make it appear as if the Company is obstructing justice, or put the Company at a serious disadvantage in litigation.

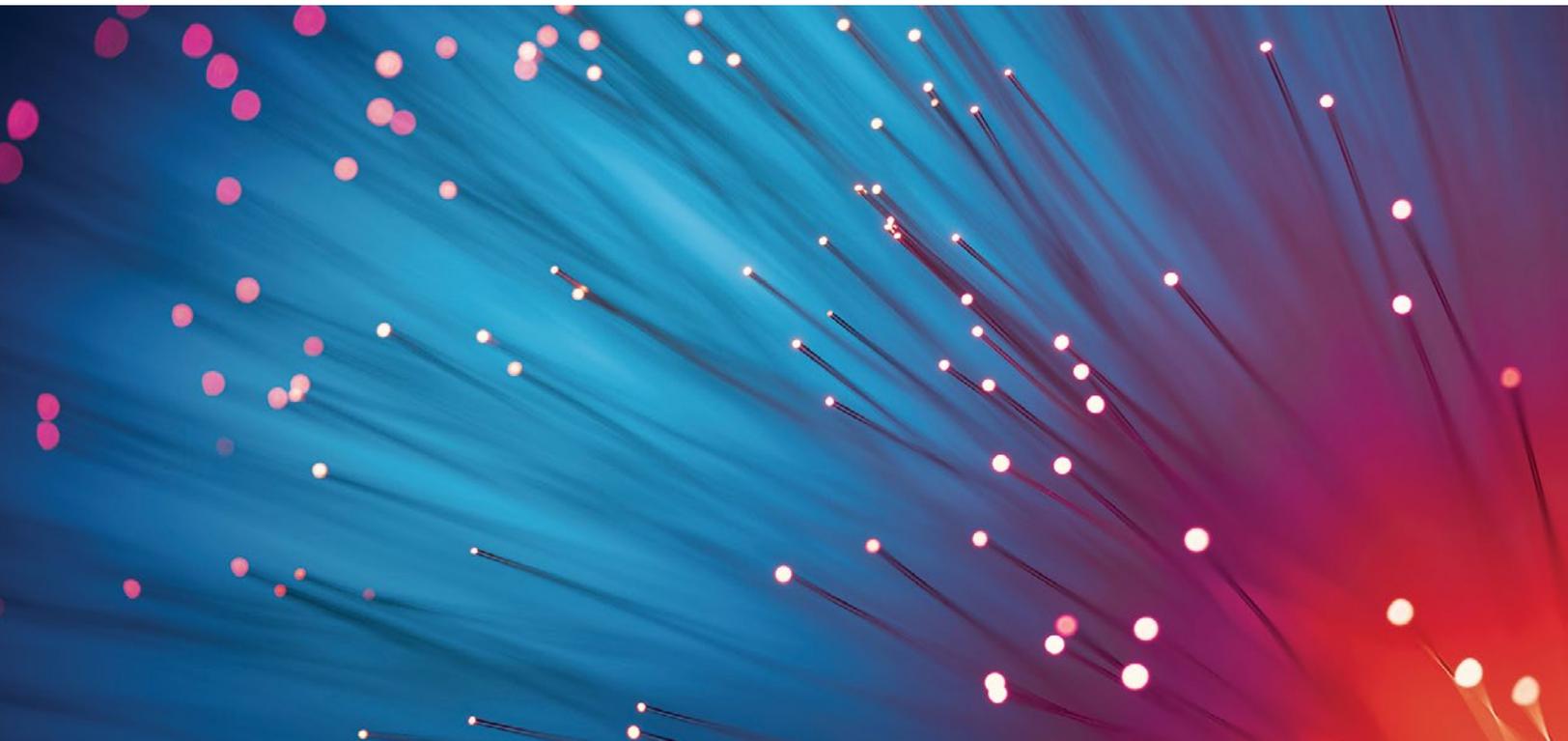
If you have questions about the records retention policies, please contact the Corporate Records Administrator at: RecordsManagement@amerisourcebergen.com.

Confidential information

Confidential business information is a valuable corporate asset to the Company that, if inappropriately disclosed, could harm the Company and its employees, customers, and stockholders. Confidential information includes, but is not limited to: personnel data, customer lists, pricing, and cost data, scientific or technical information, research data, strategic plans, marketing strategies and techniques, data processes, procedures, formulas, or improvements thereto and proprietary computer software.

All employees shall hold in strictest confidence any information deemed confidential by the Company. Employees shall not disclose confidential information to any person, except in connection with and for the benefit of the Company's business and in strict compliance with Company rules, policies, and directives, or otherwise as expressly permitted in writing by the Company.

If your employment or contractual relationship with the Company ends for any reason, you still are bound to protect the confidentiality of information you obtained while you were a Company employee. You must hold it in the strictest confidence and not use it to benefit yourself or any third party.



Business communication and disclosures

All business communications may eventually become public through a variety of means, including government requests for information, litigation, or other means. Therefore, all communications, including email, must be composed in a professional manner which, if reviewed by a third party, would reflect favorably on the Company and you. In your business communications:

- Do not use libelous, defamatory, offensive, racist or obscene remarks
- Do not include negative personal opinions or speculation, and
- Do not make legal conclusions

The Company is committed to fair disclosure to investors in compliance with all applicable securities laws and New York Stock Exchange regulations. All disclosures made by the Company to our stockholders or the investment community should be made only by authorized personnel and should be accurate and complete and, where applicable, fairly present our financial condition and results of operations in all material respects.

No employee should communicate with the media regarding Company business, operations, or customers unless specifically authorized. Any media requests should be forwarded to the Vice President of Corporate & Investor Relations. Similarly, any use of social media by an employee communicating on behalf of the Company must be approved in advance by the Corporate & Investor Relations Department.

Social media

Social media includes the employee's own or someone else's blog, journal or diary, personal website, social networking or affinity website, web bulletin board, or a chat room.

Use of social media presents certain risks and carries with it certain responsibilities. When using social media, employees should be respectful, honest, and accurate, and post only appropriate and respectful content that does not relate to Company business unless specifically authorized. In no case may an employee disclose AmerisourceBergen's confidential or proprietary information on social media accounts.

Company's ownership of intellectual property

Ideas, discoveries, developments, and inventions by employees also are valuable corporate assets of the Company. Therefore, each employee must promptly disclose to the Company in writing and in a form satisfactory to the Company all ideas, concepts, discoveries, developments, inventions, processes, improvements or knowledge (collectively, "Intellectual Property") made, conceived or reduced to practice by the employee, either solely or jointly with others, during their time of employment with the Company, relating to any of the Company's businesses, or to any work which the employee may do for the Company, or at its request. All such Intellectual Property is the property of the Company.

Each employee, by acknowledging this Code of Ethics, assigns all Intellectual Property to the Company for its sole use and benefit, without additional compensation and will, during their employment with the Company and after termination of employment for any reason, assist the Company in every proper way (at the Company's expense), to obtain and protect patents, copyrights or other intellectual property protection for any or all Intellectual Property by executing and delivering to the Company any and all applications, assignments, and other instruments, by giving evidence and testimony, and by executing and delivering to the Company all drawings, blueprints, notes, and specifications deemed reasonably necessary by the Company.



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Respect for and
safety of employees

Equal employment opportunity

The Company is committed to providing an equal opportunity work environment where employees are treated with fairness, dignity, and respect. The Company is an equal opportunity employer in all its policies regarding recruitment, hiring, transfers, promotions, compensation, benefits, layoffs, recalls and other terms and conditions of employment. All policies shall be administered without regard to race, color, religion, sex, sexual orientation, gender identity, genetic information, national origin, age, marital status, disability, veteran status, or membership in any other class protected by applicable law. All personnel decisions shall be made by using objective standards based upon the individual's qualifications and performance as they relate to the job. The Company also provides reasonable accommodations to applicants and employees who need them for medical or religious reasons, as required by law.

Diversity, equity, and inclusion

The Company is committed to advancing diversity, equity, and inclusion in our culture and in our communities. We are all responsible for creating a workplace culture of inclusion that prioritizes equitable treatment, integrating differences, inclusive decision making, psychological safety, trust, and belonging. Aligned with our purpose to create healthier futures, we are committed to the responsibility to promote health equity in our communities.

Harassment / Workplace violence

The Company is committed to providing a workplace that is free from harassment and intimidation and is safe for all employees. The Company does not tolerate degrading or humiliating jokes, slurs, intimidation, verbal or physical contact of a sexual nature, or other harassing conduct that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. The Company has a zero-tolerance policy for workplace violence.

The Company prohibits harassing, offensive or threatening language in any electronic communications.

Substance abuse

The Company is committed to maintaining an alcohol-free and drug-free work environment. You must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, or using, possessing, or selling illegal drugs while on Company time or property, will result in disciplinary action.

Some employees may be taking prescription or over-the-counter drugs that could impair judgment or skills required for job performance. If you have questions regarding the effect of such medications on your job performance or you observe someone who appears to be impaired in their job performance, please consult with your supervisor, or call EthicsPOINT. On occasion, the consumption of alcohol may be permitted at Company-sponsored or approved social events. Employees who choose to consume alcohol at such events are expected to act responsibly and refrain from becoming intoxicated or impaired.

Employee privacy

The Company is committed to protecting employees' medical, family, and personal information by refraining from discussing private matters when there is not a legitimate business "need to know."

Except as required by applicable law, employees should have no expectation of privacy in information they send, receive, access or store on any of the Company's systems, devices, or network. The Company reserves the right to review workplace communications, including but not limited to internet activity, email, instant messages, social media or other electronic messages, computer storage and voicemail, as well as employees' company-provided workspace, at any time in accordance with applicable laws.



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Accountability for code compliance

The Company expects its leadership to lead by example and to demonstrate the ethical behavior required by the Code in all facets of their work and their interaction with employees and the public. The Company also ensures accountability for and adherence to the Code by asking employees to review the Code annually, conducting background checks on certain employees, reviewing contracts for compliance with the Code, investigating reports of violations, and taking disciplinary actions where appropriate.

Annual acknowledgment

Upon beginning employment with the Company, every officer and employee will be asked to confirm that they will comply with this Code. A copy also is available on myAB United, EthicsPOINT, and on AmerisourceBergen's public website. Compliance with this Code, Company policies and procedures and all applicable laws is a condition of employment with the Company. You will be asked to review the Code at least once a year.

Review of contracts

The Company requires that all significant contracts be reviewed by a Company lawyer before being signed. Legal review helps the Company:

- Avoid contracts that are inappropriate or unlawful
- Identify and minimize unfavorable contract provisions, and
- Enter contracts that are appropriate for the business circumstances and in compliance with the Code

Legal review also ensures that the contract is signed by a Company officer or employee with the proper level of authority.

The Legal Department has developed standard forms of agreements for certain business matters that may be used without legal review provided they are used in accordance with the accompanying instructions. Any material deviation from any standard form requires legal review.

Contact the Company lawyer assigned to your subsidiary or operating group if you have any need for contract review or if you have any questions pertaining to a contract. In certain situations, it is strongly advisable, or required, to have a written agreement. Your Company lawyer can assist you in determining if a written contract is required.

Disciplinary actions

The Company may take disciplinary action against you if it is determined that you:

- Authorized or took part in activities that violate the Code, Company policies and procedures or the law
- Failed to report a violation of the Code, Company policies and procedures or the law
- Made a false report regarding a suspected violation to harm or retaliate against another person
- Failed to complete mandatory compliance training and/or complete the acknowledgment for this Code
- Failed to cooperate in an investigation, including lying during an investigation, or
- Retaliated against an individual for reporting a suspected violation in good faith

The type of action taken will depend on the nature, severity and frequency of the violation and may include any or all the following: reprimand, probation, suspension, reduction in salary or bonus, demotion, or dismissal. In addition, the Company may sue an offending employee to recover any ill-gotten gains and, where applicable, seek prosecution of an offending employee and any other parties involved in accordance with applicable laws.

If you have reason to believe that an employee has violated this Code, you should immediately report the violation using one of the reporting options listed below.

Code of ethics approval forms

To streamline the process for reporting and approval of potential Code-related conflicts, the Office of Compliance has published Electronic Code of Ethics Approval forms in the EthicsPOINT Portal. These forms will guide employees through the approval process for:

- Significant Life Event Gifts
- Sponsorships
- Outside employment
- Privacy matters
- Advisory Board requests
- Other general conflicts of interest

Waiver

Any waiver of the application of this Code to directors or executive officers of the Company shall be made only by the full Board of Directors or the Governance and Nominating Committee. All waiver requests must be presented in writing to the Corporate Secretary. The Corporate Secretary shall respond to all waiver requests within 30 days. All waivers shall be promptly disclosed to the stockholders of the Company.

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Contacts for
guidance or reporting
under the code



If you have a question about the Code, Company policies, procedures, and other guidance, or need help on how to comply with them in a given situation, or if you have concerns about any aspect of Company operations or become aware of improper activities or violations of the Code, you should promptly contact any of the following resources:

- Your Supervisor
- Your local Group Compliance Officer / Lead or local legal team
- The Chief Compliance Officer
- The Chief Legal Officer
- The Chief Privacy Officer

You can reach the following officers or departments at the addresses below:

Chief Compliance Officer

Jennifer Dubas
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7329
jdubas@amerisourcebergen.com

Chief Legal Officer

Elizabeth Campbell
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7404
ecampbell@amerisourcebergen.com

Assistant General Counsel

Andrew Schinzel
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7443
aschinzel@amerisourcebergen.com

Chief Privacy Officer

Sheila Hawes
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7437
shawes@amerisourcebergen.com

Vice President, International Compliance and Ethics, Alliance Healthcare

Wingmen Chung
Alliance Healthcare
2, The Heights
Brooklands
Weybridge
KT13 0NY
Telephone: +44 (0)1932 834818
wingmen.chung@alliance-healthcare.net

Vice President, Sr. Compliance Officer

Jennifer Dubas
AmerisourceBergen
1 West First Avenue
Conshohocken, PA 19428
Telephone: 610.727.7329
jdubas@amerisourcebergen.com

For anonymous inquiries or reporting:

Telephone reporting

AmerisourceBergen by country hotline phone numbers

| | | | | | |
|----------------|-----------------------|-------------|------------------|-----------------|-----------------------|
| United States | 1.855.214.1479 | | | | |
| Argentina | 0.800.345.3121 | Greece | 800.848.1693 | Poland | 800.005.040 |
| Australia | 1.800.961.479 | Hong Kong | 800.963.987 | Portugal | 800.180.750 |
| Austria | 0800.232959 | Hungary | 80.088.476 | Romania | 0800.360.159 |
| Belgium | 0800.76.276 | India | 000.800.919.1226 | Russia | 8.800.100.63.45 |
| Brazil | 0800.047.4581 | Ireland | 1800851273 | Serbia | Online reporting only |
| Bulgaria | 080046249 | Israel | 1-809-399-871 | Singapore | 800.852.6921 |
| Canada | 1.855.214.1479 | Italy | 800.729.258 | Slovak Republic | 0800.002.632 |
| Chile | 800.914.302 | Japan | 0800.500.5703 | Slovenia | Online reporting only |
| China | 400.120.0546 | Kenya | 0800.211.225 | South Africa | 080.098.8815 |
| Columbia | 01.800.5190402 | Korea | 080.880.0362 | Spain | 900.998.491 |
| Croatia | 0800.790.011 | Lithuania | 8.800.00.314 | Sweden | 020.12.70.35 |
| Czech Republic | 800.810.924 | Malaysia | 1-800-81-2630 | Switzerland | 0800 225 153 |
| Denmark | 80.83.02.60 | Mexico | 800.681.9279 | Taiwan | 00801.49.1609 |
| Ecuador | 1-999-119 | Netherlands | 0800.0227093 | Thailand | 1800014575 |
| Egypt | Online reporting only | New Zealand | 0800.633.145 | Turkey | 0800 621 2383 |
| Finland | 0800.412008 | Norway | 800 62 319 | Ukraine | 0800.801.419 |
| France | 0.800.90.94.74 | Peru | 0800.78126 | United Kingdom | 0808.234.1086 |
| Germany | 0800.1819284 | Philippines | 1800.1.322.0345 | Uruguay | 000.413.598.3951 |

Online reporting

www.amerisourcebergen.ethicspoint.com

Acknowledgment of receipt and understanding

I certify that I will comply with the AmerisourceBergen Code of Ethics and Business Conduct.

I will seek guidance on ethics and compliance issues when I am uncertain about which actions to take.

I certify that I am not aware of any conflict of interest or prohibited activity as set forth in this Code.

I certify that I am not aware of any violations of applicable law or the Code. If I am presently aware, or become aware, of any violations or suspected violations of applicable law or the Code, I certify that I will inform the Office of Compliance, the Legal team, other Company resources identified in this Code, or the AmerisourceBergen reporting hotline at www.amerisourcebergen.ethicspoint.com or by calling the country's hotline number.

Signature

Printed name

Date

AmerisourceBergen Company / Location

AmerisourceBergen

We are united in our responsibility
to create healthier futures.