

Dear Colleagues,

At INSYS, we believe in doing the right thing for our patients, customers, employees, communities and business partners. Our patients and customers trust the quality, efficacy and safety of our brands and our employees trust that they will always be treated with fairness and respect. This trust is earned through each of our actions every day.

The goal of this Code of Conduct (“Code”) is to ensure that we never take ethical short cuts and that we always act honestly. Ethical conduct is not a simple declaration of principles; rather an ongoing commitment. We are all responsible for reading this Code and ensuring that we understand and follow it. While no policy can anticipate every potential situation, our Code provides guidance for identifying issues and for making ethical decisions.

If you ever suspect a violation of this Code, you must report it to either your immediate supervisor, Compliance department, Legal department or the Human Resources department. When you raise a concern in good faith, you can be confident that you will not face retaliation or retribution. If you have any questions or need additional information, please speak to your manager, a member of the Executive Committee or our Compliance Committee.

Our current and future success depends on you. As we move forward, I want to thank you for your commitment to performing your daily responsibilities with integrity and to always doing the right thing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Saeed Motahari', with a long horizontal stroke extending to the right.

Saeed Motahari
President and Chief Executive Officer