

LANNETT COMPANY

SUPPLIER CODE OF CONDUCT

Lannett Company, Inc. and its subsidiaries (“Lannett”) are committed to conducting business in an ethical, legal and socially responsible manner. Lannett expects its Suppliers to share this commitment, and therefore, has established this Supplier Code of Conduct.

Lannett is committed to ensuring that all of its suppliers, regardless of location, comply with this Supplier Code of Conduct and enforce these principles throughout their own supply chains. To the extent the supplier is subject to other written local standards or requirements regarding employment, environment or business practices; the supplier should adhere to the most stringent applicable requirements.

THE PRINCIPLES CONTAINED IN THIS SUPPLIER CODE OF CONDUCT CONSTITUTE MINIMUM AND NOT MAXIMUM STANDARDS. LANNETT ENCOURAGES SUPPLIERS TO EXCEED THE MINIMUM REQUIREMENTS WHERE POSSIBLE TO PROMOTE BEST PRACTICES AND CONTINUOUS IMPROVEMENT THROUGHOUT ALL OF THEIR FACILITIES. SUPPLIERS ARE REQUIRED TO ADVISE LANNETT IF ANY OF THESE REQUIREMENTS CANNOT BE MET.

LANNETT RESERVES THE RIGHT TO CANCEL ALL CURRENT AND FUTURE PURCHASE ORDERS WITH ANY SUPPLIER FOUND TO BE IN VIOLATION OF THE SUPPLIER CODE OF CONDUCT.

Child Labor

Suppliers will not employ any person younger than either the applicable legal minimum age for working or fourteen years of age, whichever is greater. Children and young persons under eighteen will not be employed in hazardous conditions.

Voluntary Employment

Suppliers will maintain employment on a voluntary basis and must not use forced, prison, bonded, indentured or involuntary labor.

Treat Employees with Respect and Dignity

Suppliers will treat all employees with respect and dignity and may not use monetary fines or deductions from wages as disciplinary practices. Employees may not be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

Non Discrimination

Suppliers will not discriminate in the hiring, firing, or implementing of changes in the terms and conditions of employment, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, disability, veterans’ status, or political opinion.

Freedom of Association

Suppliers will respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference.

Health and Safety

Suppliers will provide a clean, safe and healthy working environment, designed to prevent accidents and injury during the course of work. Suppliers will provide employees, including new or reassigned workers, regular and recorded health and safety training. The work environment must comply with applicable laws and regulations and provide access to clean restrooms, potable water, sanitary areas for food storage, adequate medical facilities, safety personal protective equipment, well-lighted and comfortable work stations, safe storing of chemicals and well-known emergency plans with clear and accessible aisles and exits.

Compensation and Benefits

Suppliers will fairly compensate their employees by paying wages and providing benefits that meet or exceed the applicable, legally mandated minimum requirements in the country in which the suppliers operate. Employees should be provided with a clear, written account of each pay period that reflects any wage deductions and that complies with applicable laws. Suppliers will maintain employee work hours in compliance with

local standards and applicable laws of the jurisdictions in which they operate. Employees must be informed at the time of hiring if mandatory overtime is a condition of employment. Employees are to be permitted reasonable days off and applicable leave of absence privileges.

Legal and Ethical Business Practices

Suppliers will display ethical, sound and legal practices and conform to applicable local and national laws, treaties, rules, regulations and other industry practices. If industry practices conflict with applicable laws or regulations, suppliers must, at a minimum, comply with the applicable legal requirements.

Environmental Responsibility

Suppliers will comply with all applicable environmental laws and regulations. Suppliers will obtain, maintain and keep current all required environmental permits and registration and any operational and reporting requirements shall be followed.

Human Clinical Trials

As part of our new and abbreviated drug approvals Lannett conducts human clinical trials. It is Lannett’s desire to work with vendors that uphold ethical, scientific and clinical standards as required by FDA, EMA and other regulatory bodies with the same or similar standards throughout the globe. All studies must be designed and conducted in accordance with our FDA standards and local applicable laws and regulations in order to ensure the safety of subjects who participate in clinical trials.

Good Manufacturing Practices

Suppliers will follow current Good Manufacturing Practices for methods used in, and the facilities or controls used for, the manufacturing, processing, packing, or holding of all products, materials, active ingredients, excipients and components manufactured for or distributed to Lannett. These practices ensure that such drug products meet the requirements for safety and have the identity and strength and meet the quality and purity characteristics that it purports or is represented to possess.

Bribery and Corruption

Suppliers will not give or receive gifts or gratuities other than those that are nominal and consistent with local practices. In addition, suppliers will not make bribes or improper payments of any kind. Suppliers will comply with all anti-corruption laws, including those that prohibit the payment, promise, offer or authorization of money, gifts or other items of value to influence government officials or to secure any improper business advantage.

Conflicts of Interests

Supplier will avoid any personal, business or other activity that may involve, or may appear to involve, a conflict of interest with Supplier’s obligations to Company. Supplier has a duty to timely disclose to Lannett all actual or potential conflicts of interest related to their business relationship with Lannett, as well as situations that could be perceived as a conflict of interest.

Confidentiality

Suppliers will protect all confidential and proprietary information of Lannett, its customers, contractors and other suppliers, including, but not limited to, all nonpublic information that might be useful to competitors or harmful to Lannett or its customers, contractors and other suppliers if disclosed. Supplier will not use any information about Lannett for Supplier’s personal benefit. Supplier will enter into a Mutual Non-Disclosure Agreement with Lannett at Lannett’s request.

Subcontracting

Supplier will not use contractors or subcontractors for the production/manufacture of Company products or components thereof without Company’s express prior written consent, and only after the contractor or subcontractor has entered into a written commitment with Company to comply with this Code of Conduct.

Monitoring and Compliance

Lannett may engage in monitoring to confirm compliance with this Code of Conduct and applicable laws, rules and regulations, including on-site inspections, reviews of books and records. Suppliers will maintain on-site all documentation that may be needed to demonstrate compliance with this Code of Conduct.