

WHISTLEBLOWER POLICY

Purpose

Perrigo Company's Code of Conduct requires all of us – Directors, Officers and employees – to comply with the letter and spirit of applicable laws and regulations. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns about unlawful or other inappropriate activities; to encourage proper individual conduct and accountability; and to alert the Company and, where appropriate, the Audit Committee, of ongoing or potential serious problems at an early stage.

It is the responsibility of all Directors, Officers and employees to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.

Conduct Covered

This Whistleblower Policy is intended to encourage the reporting of any (1) unlawful activity, (2) violation of the Code of Conduct, (3) questionable accounting, internal accounting control or auditing practice, or (4) other serious matter, including without limitation:

Policy/ethics violation	Breach of confidentiality	Discrimination
Substance abuse	Conflicts of interest	Industrial accidents
Harassment	Unlawful competition	Workplace conditions
Fraud	Breach of fiduciary duty	Theft

Reporting Procedure

1. *Direct (non-anonymous)*: Serious concerns or complaints regarding financial/accounting matters, unethical or illegal conduct, Code of Conduct violations, or other appropriate matters should be reported directly to the General Counsel at:

Perrigo Company
Attn: General Counsel
515 Eastern Avenue
Allegan, MI 49010

Employment and workplace-related concerns should continue to be reported through normal channels, such as your supervisor, HR representative or the Vice President of Human Resources.

2. *Anonymous*: Employees preferring anonymity may report complaints or concerns regarding any serious matter *at any time* on a confidential, anonymous basis to an independently operated reporting system as follows:

U.S., China, India, UK and Mexico	
<i>By internet:</i>	www.mysafeworkplace.com
<i>By phone:</i>	US: 800-461-9330 International: Call collect (720) 514-4400

Israel	
<i>By internet:</i>	www.ethicspoint.com
<i>By phone:</i>	1-80-921-4405 (toll free)

Treatment of Complaints

- Upon receipt of a complaint, either directly or on an anonymous basis, the General Counsel will (1) determine, in consultation with the Chief Financial Officer, whether the complaint or concern actually pertains to accounting, internal accounting controls, or auditing matters and (2) acknowledge, when possible, receipt of the complaint to the sender.
- Complaints relating to accounting, internal accounting controls, or auditing matters will be reviewed initially by the General Counsel and, where appropriate, the Chief Financial Officer, the Chairman of the Audit Committee or such other persons as the Audit Committee determines to be appropriate. If the complaint is not initially sent to the Audit Committee Chairman, it will be reported to the Audit Committee on a quarterly basis. The review will be conducted in a confidential manner to the fullest extent possible, consistent with the need to conduct an adequate review. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the General Counsel, Chief Financial Officer and/or Audit Committee.
- Complaints relating to alleged misconduct by any Company executive management or that raise legal, ethical or compliance concerns about Company policies or practices will be reviewed initially by the General Counsel and sent to the Lead Independent Director of the Company's Board of Directors. The review will be conducted in a confidential manner to the fullest extent possible, consistent with the need to conduct an adequate review. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the General Counsel and/or Lead Independent Director.
- Employment-related concerns (such as substance abuse, harassment, fraud, theft, conflicts of interest, discrimination, etc.) reported either directly to Human Resources or anonymously will be handled by Human Resources. The review will be conducted in a confidential manner to the fullest extent possible, consistent with the need to conduct an adequate review. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of Human Resources.

Safeguards

1. *Confidentiality* – Violations or suspected violations may be submitted on a confidential basis or anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

2. *No retaliation* – No one who in good faith reports a violation of the Code or any other concern under this Policy shall suffer harassment, retaliation or adverse employment consequences. An employee that retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
3. *Acting in good faith* – Anyone filing or reporting a concern or complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Conduct. If a report is made in good faith but the facts alleged are not confirmed by subsequent investigation, no action will be taken against the reporting person.