Policy on Obtaining Competitive Information

Obtaining Competitive Information.

General business information about competitors, customers and vendors is important in our efforts to maintain and improve upon our competitive position both in terms of products and technology. However, it is Perrigo’s policy to use only ethical and legal means for gathering competitive information. Employees must not use improper means to develop competitive information, nor may they use misrepresentation, deception, theft, spying or bribery to obtain competitive information. In addition:

- Perrigo employees must not induce present or former employees of competitors, customers or vendors to disclose any of the competitors’ proprietary or confidential information. Even if such information is offered gratuitously, it should be refused.

- Perrigo employees are not to question any fellow employees in a manner that is likely to result in proprietary or confidential information of a previous employer being disclosed.

Use of Competitive Information

Certain competitive information can be used fully and freely. This includes information that is available in trade and other publications, obtainable by analysis of a competitor’s marketed products, or disclosed in formal presentations at public meetings. However, when information is received privately or in small group discussions, use care to determine whether the information is considered secret or a confidential relationship is being breached. If either condition exists, receipt of the information should be avoided.

Recruitment and Hiring

Employees of competitors, customers or vendors will not be recruited or hired for their knowledge of proprietary information of present or former employers. New employees should be advised against disclosing or using any proprietary or confidential information of their former employer, and Perrigo managers should take action to see that they do not. However, all employees can and are expected to otherwise make full use of the skills, experience and general knowledge learned in their previous employment.

For questions or help with understanding this policy, please consult with a member of the Legal Department.

Approved by the Compliance and Corporate Values Committee

June 22, 2007