

**IMPAX LABORATORIES, INC.**  
**CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT**

Impax is committed to establishing itself as a leader in the development, manufacturing and marketing of specialty prescription pharmaceutical products, while attaining the highest levels of quality, safety and business ethics. To achieve this goal, Impax recognizes that its business partners must also maintain appropriate ethical and professional standards, including compliance with applicable labor laws.

**Verifying of Supply Chains and Supplier Audits**

Impax personnel conduct regular cGxP compliance audits of its direct material and service providers as part of its overall commitment to the quality of its products. Impax has not employed a third party to evaluate and address risks of human trafficking and slavery in its supply chain.

**Certification**

Impax contracts with its direct material and service providers and specifies within those contracts that its business partners must comply with all applicable laws, the providers' standard operating procedures, and consistently high standards of professionalism. Impax does not currently require its direct suppliers to certify that materials incorporated into the company's products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

**Standards**

The company's Code of Business Conduct and Corporate Compliance Program require Impax employees to comply with all applicable laws and regulations, as well as company policies and procedures. Impax has not established specific standards for its employees regarding slavery and human trafficking.

**Training**

Impax is in the process of ensuring that all employees who have direct responsibility for supply chain management, as well as certain other management personnel and product buyers will be trained to identify issues relating to human trafficking and slavery.

Impax is committed to achieving the highest standards of integrity and fully complying with all legal and regulatory requirements. The company's Code of Business Conduct and Corporate Compliance Program serve as a guide for all Impax employees to maintain those standards. Any questions or comments regarding the company's business practices should be directed to the Impax Ethics Hotline at [www.impaxlabs.ethicspoint.com](http://www.impaxlabs.ethicspoint.com) or by telephone at 1-877-412-8817.