



Code of Conduct

The way we do business

zoetis



A message from our CEO

Dear Colleagues,

Our purpose to nurture our world and humankind by advancing care for animals is an ambitious and humbling pursuit. It requires each of us to uphold the highest standards of ethical business conduct every day. I am so proud of the strong culture of compliance based on our Core Beliefs and our well-earned reputation for uncompromising business integrity—and you make the difference in maintaining it.

Our success depends upon your sustained personal commitment to acting with integrity as you help us:

- Run our business in line with our Core Beliefs—Always Do the Right Thing; Our Colleagues Make the Difference; Customer Obsessed; Run It Like You Own It; and We Are One Zoetis.
- Create value for our business and society by improving the health of animals; enhancing the sustainability of animal agriculture; and enriching the lives of our customers, colleagues, and communities around the world.
- Compete based on our innovative, high-quality products and solutions that help our customers care for animals and solve their most pressing business needs.

- Create an inclusive workplace where all colleagues feel valued, and where the health, safety, and well-being of our people is a top priority.
- Deliver our business results in compliance with all applicable laws and regulations.
- Ensure our partners operate with the same high level of ethics and integrity.

Our Code of Conduct

The Zoetis Code of Conduct is the starting point for putting our Core Belief of “Always Do the Right Thing” into practice.

I am counting on every Zoetis colleague to read and apply our Code of Conduct. In addition, I strongly encourage you to ask questions and speak up if you see anything that seems to violate our standards.

The Zoetis Executive Team is committed to maintaining an environment where all colleagues feel comfortable asking questions and raising concerns to any level of leadership without fear of reprisal. Retaliation against colleagues who raise good faith concerns about actual or potential violations is strictly prohibited and inconsistent with our inclusive culture. This is a commitment I take seriously and personally.

Thank you for your commitment to doing the right thing—by acting with integrity and in keeping with the highest standards of ethical business conduct.

Sincerely,

Kristin Peck
Zoetis Inc.
Chief Executive Officer

Our Core Beliefs

The Zoetis Core Beliefs are part of the promise that we make to our customers, investors and third parties who work with us, and to each other as members of one Zoetis team.

Our colleagues make the difference

Our colleagues distinguish Zoetis from our competition. We grow our company when we create an environment where colleagues excel.

Always do the right thing

Integrity is the guiding principle for all our decisions and relationships. We are honest and trustworthy in our words and actions.

Customer obsessed

We are passionate about our customers and the animals in their care. Our customers come first, and when they succeed, we succeed.

Run it like you own it

We take ownership to deliver results that matter. We constantly pursue faster, simpler and better ways of doing business.

We are one Zoetis

Zoetis is much more than the sum of its parts. We work together with a common purpose, sharing knowledge and resources, for the best interest of our company as a whole.



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Our Responsibilities

The Code of Conduct respects that our colleagues adhere to a **Run It Like You Own It** mindset and take personal accountability for delivering results that matter in the right way.

- [Know Your Code of Conduct](#)
- [Understand Your Responsibilities](#)
- [Ask Questions and Report Concerns](#)
- [Cooperate With Government Authorities](#)



Know Your Code of Conduct

Welcome to our Code of Conduct. This document is designed to help you apply our Core Beliefs in the way we do business every day. It's a resource for the business standards and expectations we have for Zoetis colleagues to **Always Do the Right Thing**.

The Code of Conduct does not attempt to cover every situation, but it provides valuable direction and sets clear expectations for how we interact with our customers, our colleagues, and various other stakeholders. You can find more information in the Zoetis Corporate Policies and Procedures embedded throughout the Code of Conduct and on the Zoetis Corporate Policy Website. The provisions of this Code of Conduct are in addition to, and do not modify, replace, or supersede Zoetis' other policies or procedures.

In addition, the Code of Conduct is not intended to be and does not constitute a contract of employment between Zoetis and its colleagues. Each Zoetis colleague is employed by the Company on an at-will basis (unless otherwise agreed upon in writing and subject to applicable laws). At-will employment means that employment is not guaranteed for any specific amount of time, and the Company retains the right to terminate an individual's employment at any time with or without cause or notice. No oral representations made by any Zoetis colleague with respect to continued employment can alter the at-will relationship.

Who must follow the code of conduct

Everyone who works at Zoetis must follow our Code of Conduct as well as our Corporate Policies and Procedures; this includes all colleagues, officers, and directors. Any waiver of the provisions of the Code of Conduct for executive officers may be made only by the Board of Directors.

We also expect anyone acting on our behalf to conduct themselves in a manner consistent with our Code of Conduct. This includes our relationships with third parties such as agents, consultants, contractors, distributors, suppliers, and vendors. Appropriate measures may be taken if a third party fails to meet our standards or their contractual obligations.



Learn more:

- ▶ Corporate Policy and Requirements Policy



Understand Your Responsibilities

- Always act in a professional and ethical manner. Be aware that your behavior reflects on our Company.
- Be familiar with the information contained in this Code of Conduct, our Corporate Policies and Procedures, as well as other policies and procedures that may apply to your role.
- Promptly report any suspected illegal or unethical behavior using any of the resources listed in this Code of Conduct.
- Remember, pressures or demands due to business conditions are never an excuse for violating the law, our Code of Conduct, or any Zoetis policy.

Additional responsibilities of Zoetis leaders

Leaders and supervisors have additional responsibilities to ensure that we meet our high standards of ethics and compliance:

- Lead by example and be a role model for ethical behavior.
- Be a resource for others. Communicate to colleagues and our third parties who work with us how the Code of Conduct and policies apply to their daily work.
- Create an environment where honesty, integrity, and openness are valued and where everyone feels comfortable asking questions and reporting potential violations of the Code of Conduct and/or any Zoetis policy.
- Do your part to ensure that no one who speaks up suffers retaliation.

Making the right decision

Making the right decision is not always easy. There will be times when you may be under pressure or unsure of what to do. Always remember that resources are available to help, including those listed in this Code of Conduct.

When faced with a difficult decision, it may help to ask yourself these questions:



If the answer to any of these questions is **"No,"** or if you are uncertain, **stop** and **ask for help**.

Ask Questions and Report Concerns

Each of us has a responsibility to help protect the reputation and integrity of Zoetis. We have an Open Door policy to help ensure that concerns and questions are raised so that they can be appropriately addressed.

If you see or suspect illegal or unethical behavior, including possible violations of this Code of Conduct, or if you have a question or need help making an ethics or compliance decision, you have several options:

- Discuss the issue with your manager.
- Discuss the matter with any other member of management, Human Resources, or the Legal function.
- Contact the Zoetis Compliance Office directly:
 - By email: Compliance@zoetis.com
 - By mail:
10 Sylvan Way, Parsippany, New Jersey 07054
Attention: Chief Compliance Officer
 - In person: 10 Sylvan Way, Parsippany, New Jersey 07054 or by contacting your regional legal counsel.

- At any time, you may contact the **the Zoetis Safe to Say Helpline** by phone or online via the web-reporting tool.
 - Zoetis Safe to Say Helpline Number (U.S. and Canada): 1-855-322-9944
- [Click here](#) to find the Zoetis Safe to Say Helpline numbers for Zoetis locations outside the U.S. and Canada.



How to use the Safe to Say Helpline

Our Helpline is a confidential way to report possible violations of the Code of Conduct, our Corporate Policies and Procedures, or any laws, rules, or regulations. You may contact the Zoetis Safe to Say Helpline 24 hours a day, 7 days a week. The Zoetis Safe to Say Helpline is operated by specially trained third-party Ethics and our dedicated Compliance and Employee Relations Teams.

When you contact the Zoetis Safe to Say Helpline, the operator will listen, ask clarifying questions if necessary, and then write a summary report of the call. The summary will then be provided to our Compliance Office for assessment and further action.

It is important to provide as many details as possible (e.g., who, what, when, where). Because the Compliance Team or Employee Relations Team may need additional information during the review, you will be assigned a report number and be asked to call back at a later date to answer any follow-up questions.

Confidentiality

It is important that you feel secure when asking questions, making a report, or assisting with a compliance investigation. Every effort will be made to keep your identity confidential; however, in some instances, information may be shared on a need-to-know basis during the course of investigations. Under some circumstances, Zoetis may be required by law to report certain types of activities.

Retaliation is never tolerated

Zoetis will not tolerate retaliation against anyone who reports in good faith any known or suspected improper conduct or a breakdown of our business controls, nor will we tolerate retaliation against anyone who participates in an investigation. If you believe you have been retaliated against or have witnessed retaliation, report it to management or use any of the resources listed in this Code of Conduct.

Reporting “in good faith” means that you had reason to believe a violation of the Code of Conduct and/or any Zoetis policy existed and are sincere in your attempt to provide honest and accurate information, even if the investigation determines there was no violation.



Learn more:

- ▶ Open Door Policy
- ▶ Compliance Reporting Requirements and Investigations Policy

Accountability and discipline

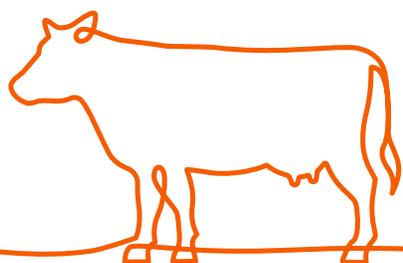
When a violation of this Code of Conduct, our Corporate Policies and Procedures, other Zoetis policies or procedures, or the law occurs, appropriate disciplinary action will be taken up to and including termination of employment. Certain actions may also result in legal proceedings, penalties, or criminal prosecution.



Cooperate With Government Authorities

Always cooperate with government authorities in connection with requests for information or facility visits.

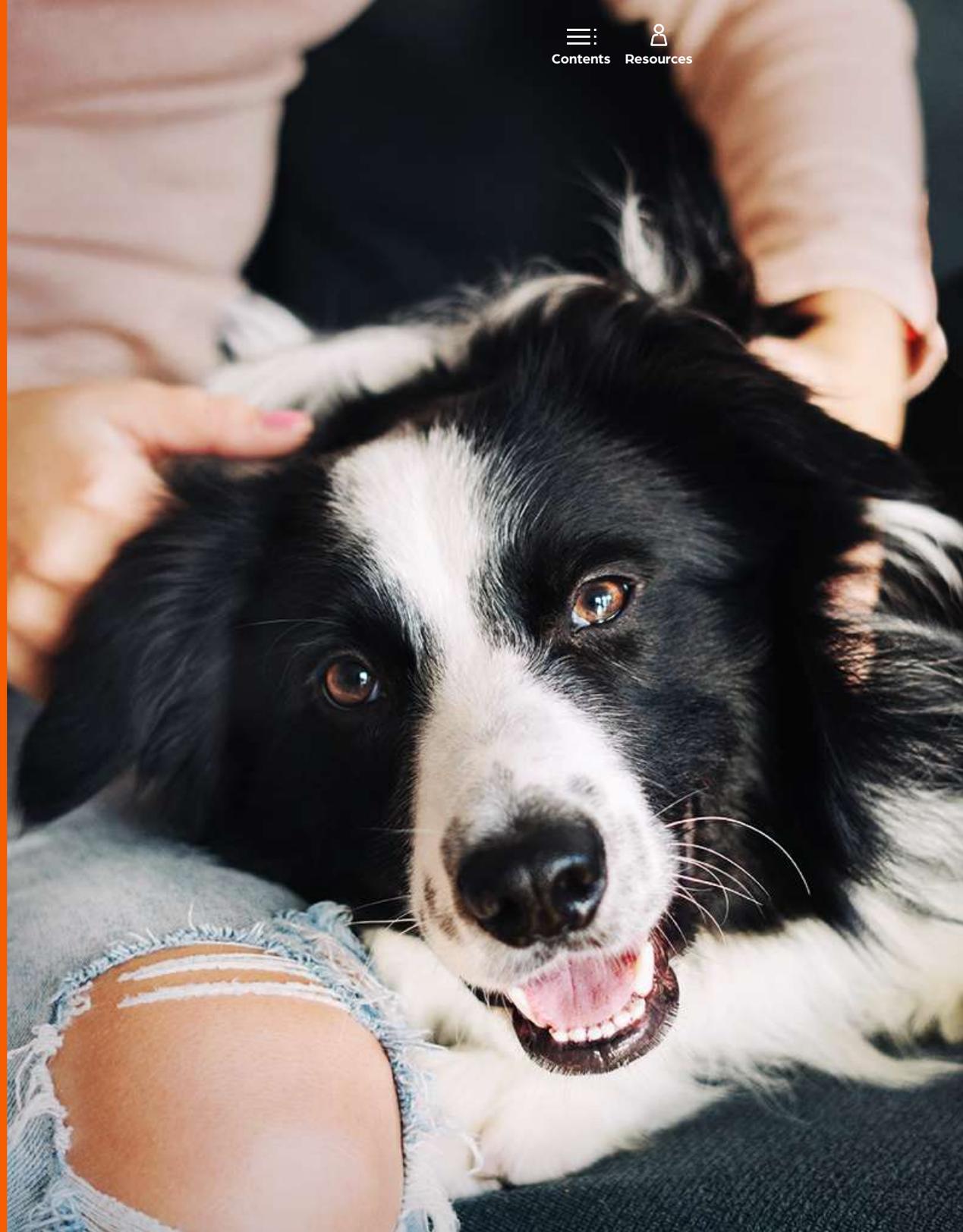
- Comply and cooperate with government inspections, investigations, or requests for information. If you are responsible for helping respond to a government request, tell the truth. Never mislead anyone, impede their work, or conceal, destroy, or alter documents.
- The Legal function must be notified of all non-routine government requests for information or facility visits. The Legal function provides all necessary legal representation of Zoetis in such situations and will determine what information needs to be provided.



Our Colleagues

Our Colleagues Make the Difference. All of us are entitled to work in a safe, respectful, and comfortable workplace where we feel valued.

- [Respect in the Workplace](#)
- [Health and Safety](#)
- [Data Privacy](#)
- [Conflicts of Interest](#)



Respect in the Workplace

Our workplace environment should be free from any fear of harassment and discrimination. This includes actions that are offensive or threatening, as well as any form of sexual harassment or bullying. The following are key steps to take to help ensure that we maintain a safe, respectful, and comfortable workplace for everyone:

- Treat others as you wish to be treated.
- Keep an open mind to new ideas and opinions, and listen to the viewpoints of others.
- Speak to your manager or other internal resources about offensive messages, comments, and inappropriate behavior.

We comply with all applicable employment, labor, and immigration requirements.

Zoetis is committed to equal employment opportunities and prohibits discrimination and harassment based on race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence or perception of a mental or physical disability, veteran status, or other characteristics protected by applicable laws. It is Zoetis' policy to provide a work environment

for colleagues that is free from harassment, including any verbal or physical harassment regarding the characteristics described above.

Harassment

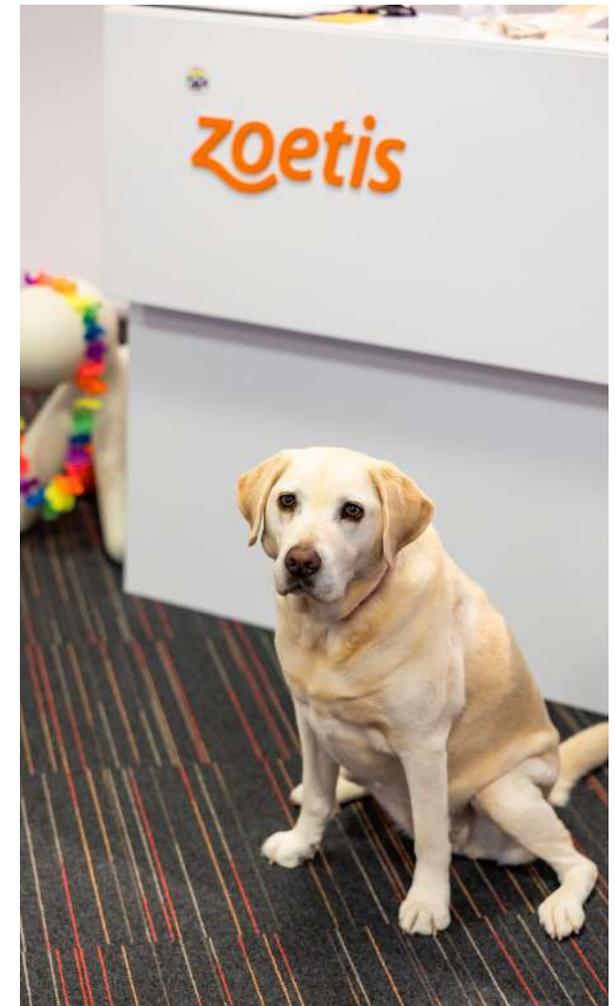
All of the following can be instances of harassment and are not tolerated at Zoetis:

- Conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment
- Inappropriate or offensive remarks or jokes (explicit or by innuendo), gestures, or physical contact
- The display of inappropriate pictures or other materials
- Promising favorable treatment or threatening unfavorable treatment based on the colleague's response to sexual demands



Learn more:

- ▶ Anti-Harassment and Non-Discrimination Policy
- ▶ Open Door Policy



Health and Safety

We look out for one another to ensure that our colleagues, contractors, and visitors are safe. Safety is always our priority.

- All colleagues have the right and responsibility to stop any work they feel may be unsafe.
- Know the emergency and security procedures that apply where you work.
- Be sure that your performance is not impaired by alcohol or any drugs, including prescriptions and over-the-counter medications, while conducting Zoetis business, regardless of time or location.
- Colleagues who are driving on Company business must never email, check the internet, or text while driving.

- Where required, always display and swipe your personal identification badge when entering and exiting Company property. Do not allow others to enter without properly swiping their personal identification badges.
- If you are injured on the job, report it to a manager immediately, no matter how minor. Never assume that someone else has made the report.
- Help contractors and others we work with to understand and follow our safety and security procedures.



Violence in the workplace

Violence of any kind has no place at Zoetis. We will not tolerate:

- Threatening or intimidating others, whether physically or verbally, at any time or for any reason
- Acts of vandalism, arson, or other criminal activities
- Weapons are not allowed on Zoetis property unless specifically authorized by the Company



Learn more:

- ▶ Safe Workplace and Asset Protection

Data Privacy



We respect the privacy of colleagues, as well as others with whom we conduct business. It is Zoetis' policy to keep personal information confidential and secure. Data privacy laws cover the processing of personal information, including collection, storage, use, sharing, transfer, and disposal. Always handle personal information (e.g., name, address, telephone number, email address, financial information, religious beliefs, medical data) with care in accordance with Company policy and applicable privacy laws.

- Ensure that the personal information you process is safe, secure, and accurate.
- Collect and use personal information for legitimate business purposes only and limit the collection to information that we really need.
- Limit access of personal information to authorized individuals and use care when sharing such information with third parties.
- Allow individuals whose personal information is held by the Company to exercise their individual rights to access, delete, and correct the information.
- Do not retain personal information for a longer period of time than can be justified by law.

Properly destroy records containing personal information as soon as there is no longer a legitimate justification to keep the information.

- Colleagues' personal information is collected and used for the purpose of the employment relationship with the Company and kept as long as required by Company policy and the law.

When we use third parties to provide services for us, make sure they understand the importance we place on privacy and that they must uphold our standards.



Learn more:

- ▶ Privacy Policy
- ▶ Records and Information Management Policy

Conflicts of Interest

A conflict of interest can happen whenever you have a competing interest that may interfere with your ability to make an objective decision for Zoetis.

Each of us is expected to be proactive and, whenever possible, avoid situations that can lead to even the appearance of a conflict of interest. If you find yourself or members of your team in a potential conflict of interest situation, please disclose it to your manager and Corporate Compliance.

It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts are more common. Being able to recognize a potential conflict can help you avoid

one. Below are some examples:

- You supervise someone with whom you have a close personal relationship. Zoetis discourages hiring close personal friends or relatives in the same function or group. A potential conflict arises if you hire, manage, or otherwise do business with a close personal friend, relative, or someone with whom you have an intimate relationship.
- You or a family member has a significant investment in one of our customers, competitors, or third parties that work with Zoetis.
- You own or do work for a company that competes, does business, or wants to do business with Zoetis. Even when outside employment is allowed, colleagues are still bound by all

confidentiality agreements with Zoetis and all Zoetis Policies and Procedures relating to confidential or inside information.

- You take a business opportunity for yourself that is meant for Zoetis or that you learned about through your job here.
- While Zoetis encourages you to be active and interested in the community in which you live and work, some activities—such as serving on a board of directors, speaking at a conference on animal health-related issues, or working on a campaign or other election-related activities—may present a potential conflict of interest in some situations.



Learn more:

- ▶ Conflicts of Interest Policy & Procedure
- ▶ Conflicts of Interest Disclosure Form

Our Customers and Third-Party Relationships

We are **Customer Obsessed** and we rely on our colleagues and the third parties we work with to deliver a memorable experience that our customers can truly appreciate while meeting our high ethical and quality standards.

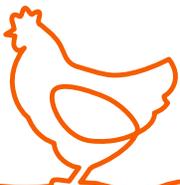
- [Animal Healthcare Laws and Regulatory Requirements](#)
- [Product Quality and Safety](#)
- [Animal Welfare](#)
- [Interactions With Animal Healthcare Professionals and Promotional Activities](#)
- [Gifts and Hospitality](#)
- [Fair Dealing With Stakeholders](#)
- [Fair Competition](#)



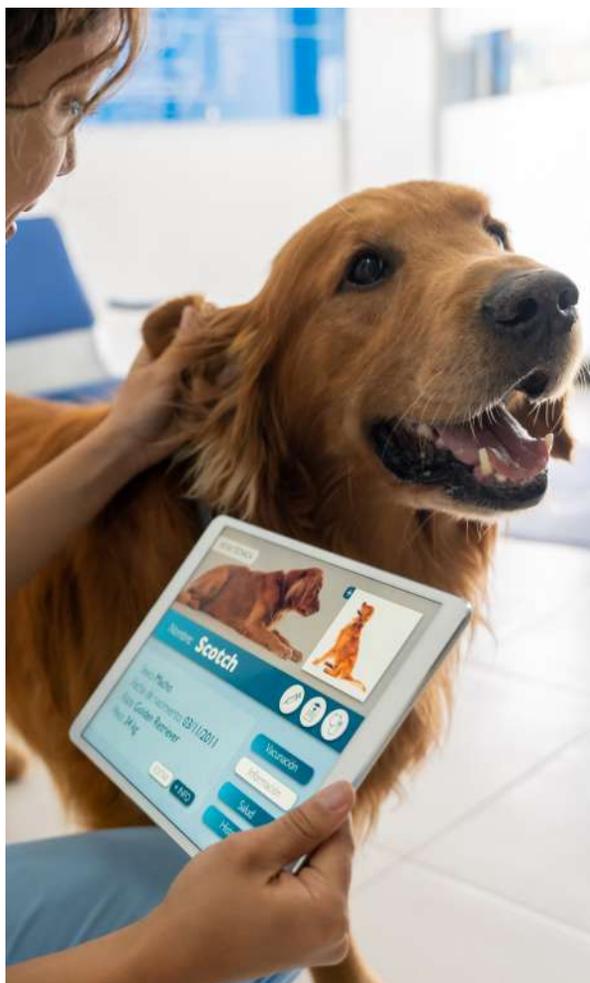
Animal Healthcare Laws and Regulatory Requirements

Zoetis follows all laws and regulatory requirements governing the research, development, manufacturing, distribution, marketing, government contracting, sale, and promotion of our products.

- As a global company, the laws and regulatory requirements of one country may apply to our activities in another country. When laws and regulatory requirements conflict, the stricter set of laws and regulatory requirements generally apply, with limited exceptions.
- If you have questions about which laws, regulations, policies, or industry standards apply to your work, contact a member of the Legal function.



Product Quality and Safety



Our customers rely on Zoetis for industry-leading product quality and safety. Understanding a product’s safety profile, as well as its quality and performance characteristics, is essential.

Product quality and safety are extensively monitored during clinical studies; however, it is only after a product has been marketed and used in real-world conditions that its safety profile and performance characteristics can become more completely known. That’s why Zoetis colleagues and the third parties we work with must share in the responsibility of reporting any safety, quality, or performance issues concerning our products.

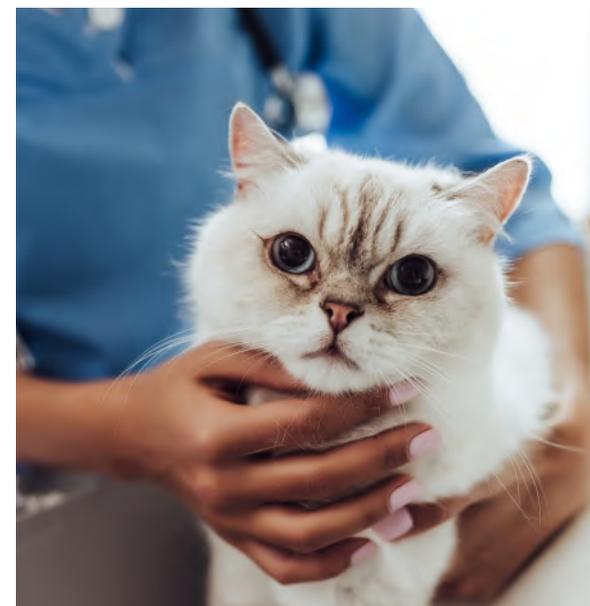
- Report all adverse events and product issues. You may learn of product issues in many different ways: through telephone calls, letters, faxes, emails, websites, completed response forms from Zoetis-sponsored marketing programs, in meetings or casual conversations at work, or even in social settings.
- In addition, certain instances that may lead to increased risk of an adverse event, such as medication errors or product defects, should be reported. This reporting should still occur even if adverse events are not currently evident. We have a legal obligation to track and report these experiences and product quality complaints to regulatory authorities.

- Any information about a product issue must be forwarded to the local country pharmacovigilance team or local country regulatory manager within 24 hours.



Learn more:

- ▶ Adverse Event Reporting Policy



Animal Welfare

We conduct all of our animal research in a responsible, humane, and ethical manner. We support the development of non-animal test methods for assessing the safety of new products that can reduce, replace, or refine the use of animal testing.

For all our products that require animal testing, we maintain high standards of animal care and welfare consistent with or exceeding those required by law.

- All Zoetis colleagues and the third parties we work with are required to thoroughly evaluate the planning and conduct of any and all animal testing to minimize and avoid unnecessary pain, distress, or discomfort, and to ensure the health and well-being of all animals under our care.
- Third-party research organizations working for us must accept the same commitment to standards and conduct for ensuring the responsible, humane, and ethical treatment of animals in research.



Learn more:

- ▶ [Animal Care and Welfare Policy](#)



Interactions With Animal Healthcare Professionals and Promotional Activities



We understand and follow the strict regulations that govern our promotional activities and our educational and commercial relationships with animal healthcare professionals. This includes our interactions with veterinarians; colleagues of veterinarian hospitals or practices; and those who administer, prescribe, purchase, or recommend prescription medications.

- No payment, gift, hospitality, or anything of value may be provided in return for specific prescribing behavior for specific products or for specific patients. Colleagues need to comply with the Interactions with Animal Healthcare Professionals Policy and the applicable Local Vet Policy in providing anything of value to animal healthcare professionals.
- All promotional materials and communications must be accurate, not misleading, and compliant with all applicable legal and regulatory standards, including any applicable standards addressing substantiation, scientific rigor, and fair balance.
- Colleagues in sales, marketing, veterinary medical services, and regulatory functions must be familiar with Zoetis' Policies and Procedures on labeling, promotional programs, product samples, and other related topics.
- Contact a member of the Legal function if you have questions about which policies, procedures, laws, regulations, or industry standards apply to your work.



Learn more:

- ▶ Interactions with Animal Healthcare Professionals Policy
- ▶ Local Vet Policy

Gifts and Hospitality

An occasional gift or offer of hospitality (e.g., meals, travel, entertainment) is often viewed as a normal part of doing business, but sometimes even a well-intentioned gift can cross the line.

At Zoetis, colleagues may only give or accept modestly valued gifts and hospitality that are a reasonable complement to business relationships, do not improperly influence others, and are in full compliance with our policies. We do not accept or provide gifts or hospitality if the intent is to bias a decision or is in return for any business, services, or confidential information.

When giving or accepting gifts and hospitality, all of the following guidelines must be met:

- It must be modest in value and not frequent.
- It must not appear to influence or give the appearance of influencing the business judgment of the recipient.
- It must be business appropriate and with a legitimate business purpose.

The following practices are never allowed:

- Giving or accepting lavish or frequent gifts or hospitality.
- Giving or accepting any gift of cash or a cash equivalent (e.g., gift cards, gift certificates).

- Giving or accepting any gift or hospitality that could be embarrassing or reflect negatively on our reputation or your reputation.
- Giving or accepting any gift or hospitality that violates the policies of the recipient’s organization.
- Giving gifts or hospitality of any kind to a government official unless specifically preapproved by the Legal function or authorized by the Local Vet Policy.



Government officials

Extra care needs to be taken when dealing with government officials as there are complex rules governing the giving of gifts, hospitality, and other business courtesies to government officials. What may be permissible for commercial customers may be illegal when dealing with the government.

- No gifts or other benefits, including hospitality, can be offered to government officials unless specifically preapproved by the Legal function or authorized by the Local Vet Policy.
- Any request made to a colleague by a government official for a payment, other than legitimate taxes or fees, must be reported immediately to the Legal function.
- If you have questions about Zoetis’ interactions with government officials, contact the Legal or Compliance function.



Learn more:

- ▶ Interactions with Animal Healthcare Professionals Policy
- ▶ Local Vet Policy
- ▶ Anti-Bribery and Anti-Corruption Policy
- ▶ Travel and Expense Policy
- ▶ Conflicts of Interest Policy & Procedure

Fair Dealing With Stakeholders

We strive to be fair and ethical in all our dealings with our internal and external stakeholders. We do not take unfair advantage of anyone through manipulation, concealment, misuse of confidential information, misrepresentation of facts, or any other unfair dealing or practice.

- We purchase supplies and services and select third parties based on need, quality, service, price, terms, and other relevant conditions.
- We protect the confidential and proprietary information of our customers and third parties.
- When we collect business intelligence, we must always live up to our standards of integrity and never engage in fraud, misrepresentation, or deception to obtain information.
- When we hire former colleagues of competitors, we must respect their obligation not to use or disclose the confidential information of their former employers.



Fair Competition

We believe in free and open competition. We gain our competitive advantages through the quality of our products, not through unethical or illegal business practices.

Every country where we operate has laws that govern relationships with competitors, suppliers, distributors, and customers. While the legal requirements vary, fair competition laws generally share the same objective: to ensure that markets operate efficiently by providing competitive prices, customer choice, and innovation.

- Never discuss, signal, or exchange competitively sensitive or non-public information with competitors.
- Never coordinate with customers or competitors to maintain or influence resale prices.
- Never agree with a competitor to coordinate bidding to a customer or agree with a customer or competitor not to deal with other companies.
- Never take unfair advantage of a position of market dominance by engaging in anti-competitive activity.

Fair competition and anti-trust laws are complex and compliance requirements can vary depending on facts and circumstances. Consult with the Legal function if you have any questions or concerns about anti-competition laws.

Trade association meetings

Trade association meetings and other industry gatherings serve legitimate and worthwhile purposes; however, these meetings pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition law obligations. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported.

If the conversation turns to any kind of anti-competitive discussion, you should refuse to discuss the matter and leave the conversation immediately.



Learn more:

- Competition Law and Competitive Intelligence Policy



Our Company

We are **One Zoetis**. Based on our Core Beliefs, we work together to achieve team objectives with integrity and develop solutions that benefit our customers and Zoetis as a whole.

- [Accurate Recordkeeping and Financial Reporting](#)
- [Confidential Information](#)
- [Protecting Inside Information](#)
- [Use of Company Assets](#)
- [Speaking on Behalf of Our Company](#)



Accurate Recordkeeping and Financial Reporting

Investors, government authorities, and others rely on our accurate and complete business records and disclosures. Such information is also essential within the Company so that we can make informed business decisions.

Our books and records must be accurate, timely, complete, and in compliance with accepted accounting principles and our internal controls.

It is the responsibility of colleagues to report any unrecorded funds or assets, or false or artificial entries in the books and records of Zoetis. If you learn of or suspect accounting fraud, report it immediately by contacting a member of the Legal function, the Compliance Office, the Internal Audit function, or our Controllers function.

Colleagues with a role in financial or operational accounting have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records.

- Make sure that financial entries are clear and complete and do not hide or disguise the true nature of any transaction.

- Never record false sales or shipments or record them early, understate or overstate known liabilities and assets, or defer recording items that should be expensed.
- Do not maintain undisclosed or unrecorded funds, assets, or liabilities.
- Always comply with our Travel and Expense Policy, including being sure that expense reports are accurate.
- Always be accurate, complete, and truthful when submitting time sheets, research, quality, and safety results.



Learn more:

- ▶ Travel and Expense Policy
- ▶ Authorizations and Approvals Policy
- ▶ Purchasing Policy
- ▶ Accuracy of Financial Statements Policy

- ▶ Legal Entity Lifecycle and Financial Requirements Policy
- ▶ Corporate Internal Audit Policy
- ▶ Use of Independent Auditors Policy
- ▶ Records and Information Management Policy

Legal and tax audit holds

Documents should only be destroyed in accordance with the Zoetis Enterprise Records Retention Schedule (ERRS) and never in response to or in anticipation of an investigation, lawsuit, or audit.

If you receive a “Legal Hold” or “Tax Audit Hold” you must not alter or discard any relevant information. Contact the Legal function if there is any doubt about the appropriateness of record destruction.

Confidential Information

Confidential information is a highly valuable asset at Zoetis.

The unauthorized use or release of confidential information may result in loss of competitive advantage and damage to our reputation or our relationships with customers and third parties.

For these reasons, the access, storage, transmission, and use of confidential information must be consistent with our policies and procedures.

- Disclosure of confidential information to a third party requires appropriate authorization and a confidentiality agreement. If in doubt, check with your manager or the legal function.
- Disclosure of confidential information should be limited to only that information necessary to

achieve the legitimate business purpose.

- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Do not share passwords or allow other people, including friends and family, to use our information technology resources.
- Do not discuss confidential information in public places where others may overhear.
- Beware of suspicious telephone or email requests from outsiders seeking information (commonly known as “phishing”).
- Report any suspected problems or concerns to your manager or the legal function.

Examples of confidential information include:

- Business plans
- Trade secrets
- Sales and profit figures
- Pricing
- New product or marketing plans
- Research and development ideas
- Manufacturing processes
- Information about potential acquisitions, divestitures, and investments



Protecting Inside Information

In the course of business, you may become aware of material, non—public information about Zoetis or other publicly traded companies. Using this information for personal gain, sharing it with others, or spreading false rumors is not only unfair to other investors—it's illegal.

- Never buy, transfer, gift, or sell any stocks, bonds, options, or other securities of any company, including Zoetis, based on material, non-public information.
- Do not pass on material, non-public information or “tips” to others.
- Know the kinds of information considered inside information. Examples include non-public information about mergers or acquisitions, sales or earnings results, financial forecasts or guidance, changes to the executive management team, pending material lawsuits or major business wins or losses, etc.
- If you have any questions about whether information is material and non-public, contact the Legal function.

Definitions

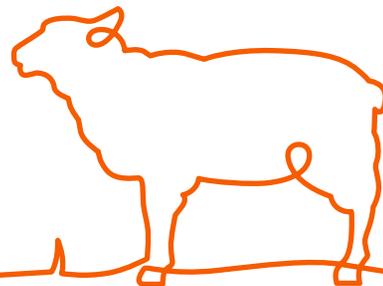
Information is **material** if it is likely that an investor would buy or sell a security as a result of having that information.

Information is **non-public** if it has not been released broadly to the public, e.g., through widely disseminated company communications, such as press releases, external websites, and/or regulatory filings.



Learn more:

- Insider Trading and Confidentiality Policy



Use of Company Assets

Each of us is entrusted with the care of Company assets; we must be proactive in protecting them from loss, damage, theft, waste, and improper use.

Our assets

Zoetis assets include physical property, facilities, equipment, inventory and supplies and also corporate opportunities, financial resources, confidential information, files and documents, computer networks, and their content. Our corporate brand and intellectual property (IP) are key assets. Our IP includes patents, trademarks, trade secrets, copyrights, and scientific and technical knowledge.

- Our assets must not be given or sold to anyone without appropriate approval.
- Guard our intellectual property and respect the intellectual property rights of others.
- Only use authorized software, devices, and procedures.
- Unauthorized devices, such as home computers, may not be used to transmit, store, or work on Zoetis proprietary information.

- You should have no expectation of personal privacy when using Zoetis systems. Emails, instant messages, texts, and voicemails are considered Company property.
- Limited personal use of phones and computer systems is allowed as long as it does not have a negative impact on your performance, productivity, the work environment, or violate any Zoetis policies.



Cybersecurity

We are all increasingly dependent on networks, databases, and the information they contain. Each of us must do our part to protect our data and information systems from accidental and intentional breaches:

- Make sure you follow our policies and practices that are designed to protect our networks, computers, programs, and data from attack, damage, or unauthorized access.
- Only use authorized software and devices. Home computers may not be used to transmit, store, or work on our proprietary information.
- Protect your user names and passwords.
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information.
- Don't open suspicious links in emails, even if you know the source.



Learn more:

- ▶ Use of Information Systems and Assets Policy
- ▶ Corporate Brand, Copyright, and Trademark Policy

Speaking on Behalf of Our Company

We need a clear and consistent voice when providing information to the public and the media. For this reason, it is important that only formally designated colleagues speak publicly on behalf of Zoetis. Unless you are authorized to do so, do not make any public statements on behalf of the Company.

Contact Global Corporate Communications for media and public inquiries or Investor Relations for analyst and investor inquiries. This includes formal and informal requests for Company information, whether made in person, over the phone, in writing, or using any form of social media.

- Never give the impression that you are speaking on behalf of Zoetis in any communication that may become public if you are not specifically authorized to do so. If you use social media personally, you should note in your profile that opinions being expressed are your own and not those of Zoetis.
- Obtain approval from your manager before making public speeches, writing articles for professional journals, or engaging in other public communications when you are speaking on behalf of Zoetis. Consult with Corporate

Communications to address any questions you have about what is appropriate to include in such communications.



Learn more:

- ▶ External Communications and Presentations Policy

Social media

Be careful when writing communications that might be published online. Think carefully before you hit the “send” button in an email or a text or post on a social media platform. When using social media:

- Use good judgment, including expressing ideas and opinions in a respectful manner.
- Clearly state that any opinions you express are your own and do not reflect those of Zoetis.
- Don’t disclose confidential business information about the Company, our customers, or third parties who work with us.
- If you see something online that could be potentially harmful to Zoetis’ reputation, report it immediately to Corporate Communications. Don’t respond to negative comments yourself.
- Report adverse events found on the internet or in social media to Veterinary Medical Information Product Support (VMIPS). In the U.S., you can submit a report to VMIPS@zoetis.com and for reports outside of the U.S., you should submit a report to the local country pharmacovigilance team or local country regulatory manager.

Our World

We have a reputation for being a good corporate citizen and neighbor and striving to **Always Do The Right Thing**. We are proud to be a company that creates value for our business and society by improving the health of animals and enriching the lives of our customers, colleagues, and communities around the world. Zoetis strives to be a trusted partner for a more sustainable future. Our sustainability strategy is built on our purpose—to nurture the world and humankind by advancing care for animals—and led by our dedicated colleagues who are Driven to Care for our Communities, Animals, and the Planet we share.

- [Serving Our Communities](#)
- [Human Rights](#)
- [Sustainability](#)
- [Anti-Bribery and Anti-Corruption](#)
- [Global Trade](#)
- [Political Activity](#)



Serving our Communities

We use our resources and expertise to make a difference in the communities where we operate. This includes participating in organizations dedicated to preparing young people for careers in animal agriculture and science as well as supporting organizations that share our commitment to pet adoption.

We also provide medicines, vaccines, and diagnostics to shelters that provide healthcare for animals awaiting new homes. When natural disasters strike, we work with our local teams to respond with financial support and vital veterinary medicines to help protect animal health and welfare.



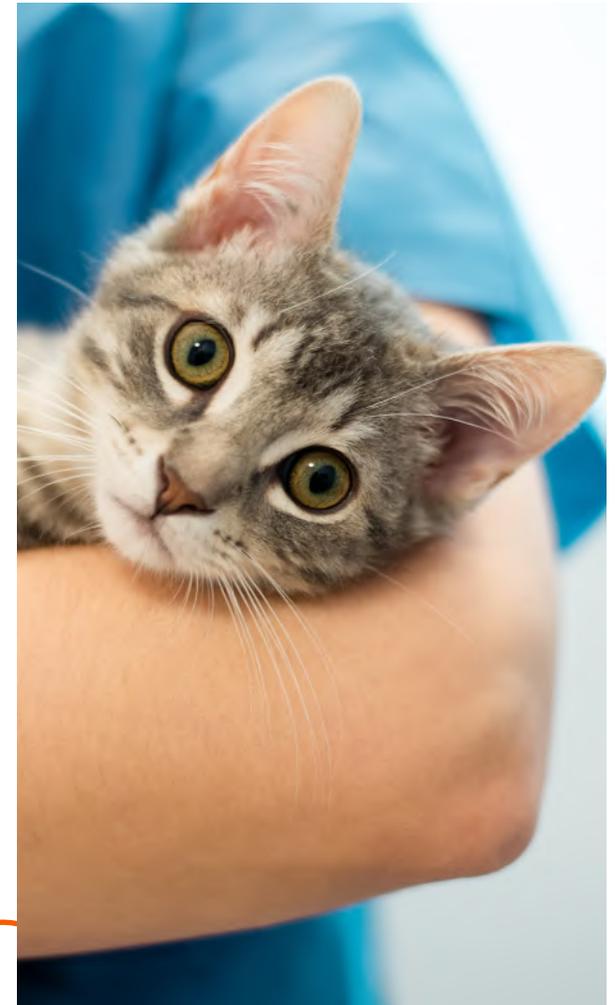
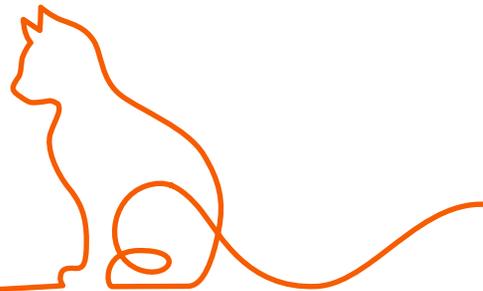
We encourage colleagues to support the communities where we operate through volunteerism. Business leaders and their teams determine the ideal direction for such efforts at a local level.

- Zoetis supports giving back to communities with our Volunteer Day Policy, which allows colleagues one day of paid time off per calendar year to volunteer for a charitable organization of their choice in most markets.
- Soliciting or pressuring colleagues, customers, or third parties to support your favorite charities or causes is not allowed.



Learn more:

- ▶ Charitable Contributions Policy



Human Rights

We are resolutely committed to respecting the human rights and dignity of everyone, and we support international efforts to promote and protect human rights. We have a zero-tolerance policy with respect to abuse of human rights in our operations and our supply chain.

Each of us can help support efforts to eliminate abuse and protect human rights:

- Report any suspicion or evidence of human rights abuse in our operations or in the operations of our third parties to the Legal function.
- Remember that respect for human dignity begins with our daily interactions with one another and with our customers and third parties. It also includes promoting diversity and inclusion, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.



Learn more:

- ▶ [Human Rights Policy](#)



Sustainability



Driven to Care formalizes our commitments to customers, the communities we serve and our colleagues. Across three pillars—Communities, Animals, and Planet—our sustainability strategy outlines our priorities and the aspirations we have set to build a healthier future for all. Our aspirations provide a roadmap for how Zoetis can help make an impact and drive achievement of the 17 United Nations (UN) Sustainable Development Goals (SDGs), 11 of which we directly support.

Driven to Care is our response to the interconnectedness among communities, animals, and the planet, in addition to the sustainability issues that affect every one of us. Overcoming the complex challenges we face requires a holistic approach—one that can benefit from the combined expertise and passion we and our customers share. Our colleagues play a key role in achieving our Driven to Care aspirations. Stay connected to our overall sustainability strategy, Driven to Care, and learn more about your role in the resources below.



Learn more:

- ▶ Policy on Sustainability
- ▶ Position on Responsible Use of Antibiotics in Animals
- ▶ Sustainability Report

Anti-Bribery and Anti-Corruption

Bribery and corruption in all of their forms are completely contrary to our Core Beliefs and business standards.

Always work honestly and with integrity. Never offer or accept a bribe from anyone, including government officials and our commercial business partners—and remember, we are not only responsible for our actions but also for the actions of any third parties who represent Zoetis.

We must be extra careful about bribery and corruption issues to government officials. In some countries, our veterinarian customers and other animal healthcare professionals may be considered government officials, and additional requirements

Definitions

A **bribe** is anything of value that is given to influence the behavior of someone in government or the private sector in order to obtain an improper business, financial, or commercial advantage. A bribe can be something other than cash. A gift, a meal, a favor, even an offer of a loan or a job could be considered a bribe.

Facilitation or "grease" payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities.

may apply. Please refer to your Local Vet Policy for more guidance.

The laws in some countries impose additional penalties for bribing government officials, but for us, it's simple: offering or accepting a bribe from anyone at any time is always wrong.

- Do not give or accept bribes or kickbacks, offer facilitation or "grease" payments, or accept or provide any other kind of improper payment.
- Keep accurate and complete books and records so that payments can be honestly described and documented.
- Be aware of our anti-bribery and anti-corruption standards when selecting third-party providers that provide services on our behalf. Be vigilant and monitor their behavior. Never "look the other way."
- Be aware that not reporting a bribe or other illegal activity may in itself be a violation of our Code of Conduct.



The global impact of bribery and corruption

We know that paying bribes can harm our reputation and cost millions in fines and fees—but there is even more at stake. Bribery and corruption can distort global commerce and compromise product quality and animal well-being. In addition, corruption has a disproportionate impact on developing economies, and the money from bribes and corruption often supports un-democratic regimes.

For all these reasons, we have a zero-tolerance policy on bribery and corruption. It's not just illegal; it's completely contrary to the way we do business.



Learn more:

- ▶ Anti-Bribery and Anti-Corruption Policy
- ▶ Local Vet Policy

Global Trade

Many laws govern the conduct of trade across borders. We are committed to complying with all such laws. If you are involved in international operations, logistics, finance, meeting planning, manufacturing and supply, research and development, regulatory, or legal, it is especially important that you know and comply with the requirements associated with the countries in which you do business.

Suspicious payments

To help prevent and detect money laundering and terrorist financing, watch for any suspicious payments, payments made from personal accounts instead of business accounts, and funds from financial institutions or third parties without a logical relationship to the customer or third party.



- Maintain required import, export, and customs records at each of Zoetis' business locations.
- If you receive a request to participate in a boycott or are asked about Zoetis' position on a boycott, contact the Legal function immediately.
- If there appears to be a conflict between laws, customs, or local practice, get help from the Legal function.
- Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws.
- Any questions or concerns about trade laws or known violations should be directed to the Legal function.



Learn more:

- ▶ Global Trade Policy

Political Activity

We believe in the right of colleagues to participate in the political process. You are encouraged to be active in political activities on your own time and at your own expense.



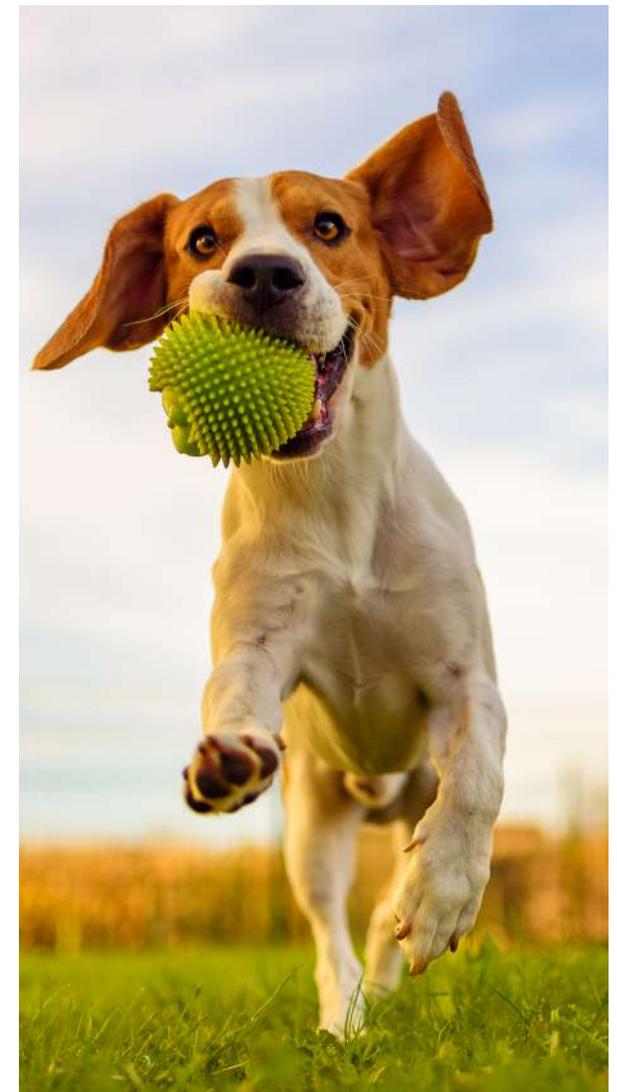
Learn more:

- ▶ [Political Contributions Policy](#)

Pressure

Never pressure another colleague, customer, or third party to contribute to, support, or oppose any political candidate or party.

- When communicating, make it clear that your political views and actions are your own and not those of Zoetis.
- Never use Zoetis' funds, assets, or facilities to support any charity, cause, political candidate, or party unless specifically permitted by law and expressly authorized in writing by the Legal function.
- Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Zoetis.
- Do not solicit contributions or distribute political literature during work hours.
- Never make a charitable or political contribution with the intent to improperly influence someone.



Helpful Resources

Reporting a Concern

Safe to Say Helpline Number (U.S. and Canada): +1-855-322-9944

For Helpline Numbers outside the U.S. and Canada, click [here](#)

Email: Compliance@zoetis.com

Web-Reporting Tool: <https://zoetis.ethicspoint.com>

Compliance Office

Compliance@zoetis.com

Privacy Office

Privacy@zoetis.com

Human Resources

ZoetisColleagueServices@zoetis.com

+1-855-984-7463

Corporate Communications

ZoetisCommunications@zoetis.com

Global Headquarters and United States

+1-973-822-7000