



Code of Conduct and Ethics: Committed to Integrity



Walgreens Boots Alliance

Contents



Leadership message	3
Living our purpose, vision and values	4
Our Code	5
Compliance with our Code	5
To whom does our Code apply?	5
How to use our Code	6
We uphold our Code	7
We speak up	8
We make good ethical decisions	10



Our commitment to... each other	11
We embrace diversity, equity and inclusion	12
We promote respect	13
We keep our workplace healthy, safe and secure	14



Our commitment to... our customers and communities	15
We deliver safe, high-quality products and services	16
We market our products and services openly and honestly	17
We are committed to running a sustainable business	18



Our commitment to... our marketplace	19
We avoid conflicts of interest	20
We conduct our business honestly and with integrity	21
We comply with applicable financial laws and regulations	22
We comply with applicable international trade laws and regulations	23
We deliver high-quality pharmacy and healthcare services	24



Our commitment to... our partners	25
We choose suppliers with integrity	26
We adhere to laws relating to government contracts and programs	27
We maintain appropriate relationships with healthcare professionals	28



Our commitment to... our shareholders	29
We maintain accurate books and records	30
We protect WBA assets	31
We comply with insider trading laws	32
We safeguard confidential and proprietary information	33
We communicate responsibly	34



Resources	35
Waivers	36



Stefano Pessina



Tim Wentworth

Leadership message

At Walgreens Boots Alliance (WBA), integrity and high ethical standards are the foundation of everything we do. Our Code of Conduct and Ethics (our Code) guides each of us in fulfilling our purpose in line with our values.

The theme of our Code is “Committed to Integrity.” This means we do the right thing – every day, in every way. Our commitment to integrity extends to how we interact with each other, our patients and customers, our communities, our marketplace, our partners and our shareholders. Acting with integrity protects our reputation, builds trust and is essential to our continued success.

We expect everyone at WBA to read, understand and commit to complying with our Code. Refer to our Code when you have questions or doubts about the right thing to do, and use the many resources that are available to support you. If something is still unclear, please speak up. Your manager, a representative from Human Resources or

an Office of Ethics and Compliance leader should be able to help. You can also use our confidential Compliance and Ethics Hotline at any time to ask questions or report concerns.

Thank you for your commitment to integrity as we work to be a force for good in the communities we serve around the world.

Best regards,

Stefano Pessina
Executive Chairman

Tim Wentworth
Chief Executive Officer

Living our purpose, vision and values

OUR
WHY

Our Purpose

**More joyful lives
through better health.**

OUR
WHAT

Our Vision

**To be the leading partner in reimagining
local healthcare and wellbeing for all.**

OUR
HOW

Our Values

Courageous

Connected

Committed

Curious

Our Code

At WBA, we are Committed to Integrity. This means complying with the laws, regulations and WBA Policies that apply to our work. It also means at times going beyond compliance – doing the right thing even if there is no specific legal requirement or applicable policy.

Our Code outlines the principles and behaviors we are expected to follow in our daily work. It helps us fulfill our purpose. It keeps us true to our values and enables us to build trust among our colleagues, customers, communities and other stakeholders so that our business will be sustainable and successful in the long run.

Compliance with our Code

Compliance with our Code is mandatory. If you fail to comply with laws, regulations and WBA Policies including our Code, there will be consequences, which may include disciplinary action up to and including termination of employment. If your actions violate the law, additional legal consequences including civil penalties, criminal prosecution, fines and imprisonment may occur that could impact WBA, individual team members and leaders.

To whom does our Code apply?

Our Code applies to:

- ▶ WBA Board of Directors
- ▶ WBA officers
- ▶ WBA team members
- ▶ WBA subsidiaries' team members
- ▶ Officers and employees of any business in which WBA or a subsidiary has a controlling interest
- ▶ Parties acting on behalf of WBA or its subsidiaries, including consultants, agents, suppliers, intermediaries or representatives



How to use our Code

Our Code is divided into sections, outlining how we commit to integrity with respect to:



Each other



Our customers and communities



Our marketplace



Our partners



Our shareholders

Our Code is intended to define how we should conduct ourselves as team members or representatives of WBA. We encourage you to refer to it often, whenever you have questions or need more information. For the various topics covered in our Code, you will find the following information. Our Code is also supported by applicable company and local policies.

Our commitment

A statement of the principles that guide our actions in that area

Why it matters

An explanation of how following these principles helps us to be better at what we do

Keeping our commitment

A list of specific behaviors to follow

Examples

For increased understanding of the topic

What should I do?

Examples that bring select topics to life

We uphold our Code



Our responsibilities

We are each responsible for reading, understanding and upholding our Code. We live our commitment to integrity when we:

- ▶ **Comply** with our Code, company policies and laws and regulations that apply to our work.
- ▶ **Understand** the legal and reputational risks we face in our business, and how our Code and company policies help manage those risks.
- ▶ **Speak up** with any questions or concerns, and report observed or suspected misconduct or Code violations.
- ▶ **Cooperate** with audits and investigations if called upon.
- ▶ **Lead** others by acting as role models in living our values, upholding our Code and supporting an inclusive environment.



Managers' additional responsibilities

If you are a manager, you have a special responsibility to live our commitment to integrity, and you achieve this when you:

- ▶ **Encourage** your team to speak up when they have questions or concerns; actively champion and create an inclusive environment.
- ▶ **Listen** to team members who raise concerns, and follow up to ensure concerns are addressed appropriately and effectively.
- ▶ **Never retaliate** against anyone who raises a concern in good faith and/or cooperates in an investigation.
- ▶ **Recognize** team members who do the right thing, and consider a commitment to ethics and values in performance reviews.
- ▶ **Never compromise** our company's integrity or values for business results.



We speak up

At WBA, we believe in creating an inclusive workplace where everyone feels comfortable bringing forward their ideas – and their concerns.

If you have a concern, WBA needs to hear from you. Immediately report any situation that compromises or appears to compromise our integrity or our reputation.

Support anyone who raises a concern in good faith. If you are asked to participate in an investigation, provide accurate and complete details. Do not make false or misleading statements in or during an investigation, and do not encourage anyone else to do so.

Seeking help

At WBA, our open-door environment is key to our culture. It encourages us to present ideas, raise concerns and ask questions – including those of a legal or ethical nature. Your own manager is often the best resource for most of your concerns, but if you feel uncomfortable, you may raise your concerns with any member of management, without fear of retaliation.

Our Code cannot anticipate every situation you may find yourself in. If you ever have a question about what you should do in a specific situation, we have resources available to help you. You can raise your questions or concerns with:



Any manager,
including your
own



Human
Resources or the
Office of Ethics &
Compliance team



Our Global Chief
Compliance and
Ethics Officer



The Compliance
and Ethics
Hotline

Using the Compliance and Ethics Hotline

As part of our “Speak Up” culture, our confidential Compliance and Ethics Hotline is available for any team member to raise concerns about inappropriate business conduct or unethical behavior. The hotline is managed by an independent third party, and it is available 24 hours a day, seven days a week in your local language. You can report via phone or an online portal to:



Ask a question



Request guidance



Report a concern





We speak up

Confidentiality and anonymity

We will make every effort to protect the confidentiality of reporters, and you may remain anonymous as allowed by law.

Retaliation

WBA is committed to protecting the rights of anyone who raises an issue in good faith, and we do not tolerate retaliation. You will not be punished or retaliated against for raising a concern in good faith.

Anyone retaliating against any team member for making a report or cooperating in an investigation shall be subject to discipline, up to and including termination of employment.

Team members who feel that they are facing retaliation should report their concern to management, the Compliance and Ethics Hotline, Human Resources or the WBA Global Chief Compliance and Ethics Officer.

What should I do?

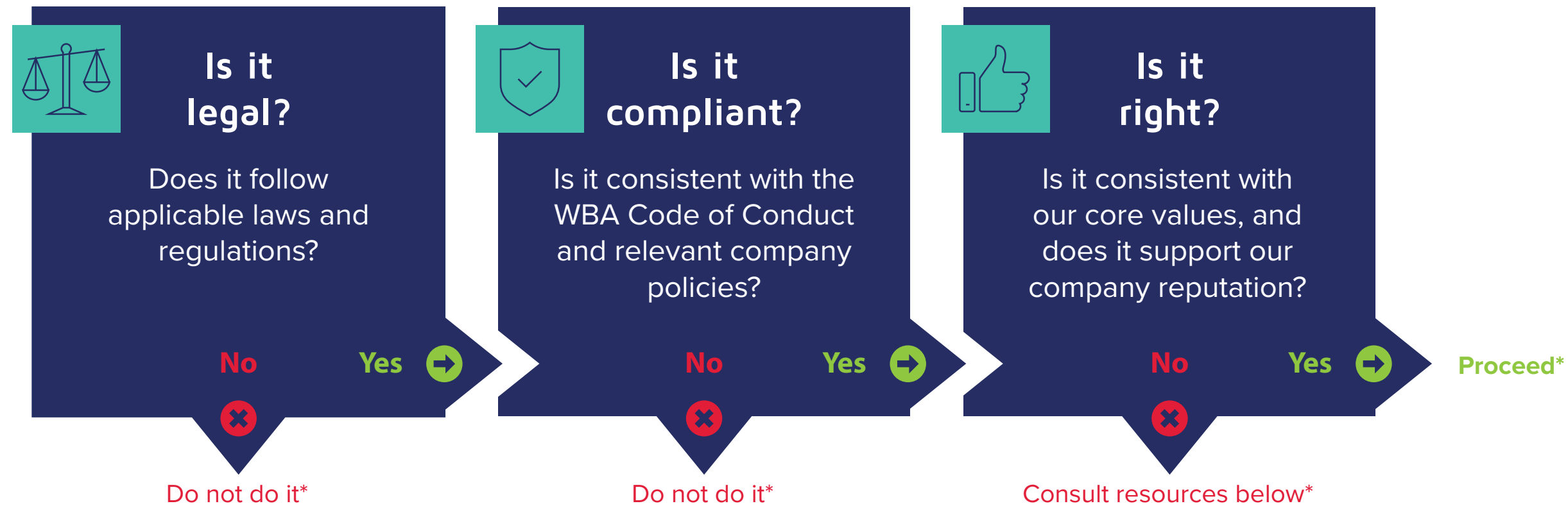
Two months ago, I made an allegation of misconduct involving my team. Ever since then, my manager and teammates have been ignoring me in meetings and not including me in outside social activities.

Retaliation involves a significant change in how you are treated after raising an issue, especially by your manager. If you are being treated differently by your team after you reported an allegation of misconduct, this could be retaliation. You should report your concern about retaliation to senior management, the Compliance and Ethics Hotline, Human Resources or the WBA Global Chief Compliance and Ethics Officer.

We make good ethical decisions

Ethical decision-making guide

We commit to making decisions that align with our company values every day. Use this resource as a guide for making ethical decisions.



*If you are not sure of the answer to a question or how to proceed, consult with these resources:

- ▶ Ask the Compliance and Ethics Hotline.
- ▶ Ask the Global Chief Compliance and Ethics Officer or any member of the Office of Ethics & Compliance team.
- ▶ Ask your Human Resources or Legal representative.





Our commitment to...
each other

We embrace diversity, equity and inclusion

Diversity, equity and inclusion (DEI) means representing and supporting the unique identities, experiences and abilities of all our team members, patients and customers.



Our commitment

At WBA, we pride ourselves on creating an inclusive environment that welcomes, values and champions diversity, equity and inclusion.



Why it matters

DEI is a key aspect of WBA's value system and culture. It helps inspire the innovation that drives our business and enhances our competitive advantage. Our workforce should reflect the diversity of our patients, customers and the communities we serve across the globe.



Keeping our commitment

- ▶ **Hire** people from diverse backgrounds.
- ▶ **Support** team member-driven Business Resource Groups (BRGs) to drive diversity and inclusion on a local level.
- ▶ **Buy** from diverse and small businesses.
- ▶ **Provide** diversity, equity and inclusion training and learning experiences.

Examples

Our business

- ▶ Focusing intentionally on our spend with diverse and small businesses, including minority and women-owned businesses
- ▶ Earning top scores on the Disability Equality Index and the Corporate Equality Index on LGBTQ workplace equality

Our team member experience

- ▶ Expanding BRGs globally across WBA
- ▶ Conducting unconscious bias training and DEI education initiatives
- ▶ Expanding programs for team members with disabilities

What should I do?

I am a hiring manager with two great candidates. They both have the same skills, abilities and experiences. The only difference is their gender, and we only have men on our team now. Since they have the same qualifications, is it okay if I hire the woman just because it will increase the diversity on my team?

You should hire the best qualified candidate for the job. If two candidates are equally qualified, it is appropriate to consider factors such as experience with leading diverse teams and valuing diverse perspectives.

We promote respect

A respectful work environment is free of harassment and discrimination. Harassment includes conduct that creates an intimidating, hostile or offensive working environment. Discrimination means treating people differently based on factors such as race, color, gender, age, religion, disability, sexual orientation, national origin, military status, marital status or any other status protected by applicable law (known in the U.S. as a protected class).



Our commitment

We respect everyone, provide equal opportunities to team members and we do not tolerate harassment or discrimination of any kind.



Why it matters

We do not tolerate harassment or discrimination because they are not aligned with our core values and are prohibited by law. We believe in upholding a positive and respectful work environment for our team members, every day. Additionally, if you violate laws, regulations and WBA Policies concerning harassment and discrimination, you could face civil and criminal penalties.



Keeping our commitment

- ▶ **Treat** everyone with respect.
- ▶ **Do not** harass or discriminate against anyone.
- ▶ **Report** any act of discrimination or harassment you witness or experience.

Examples

Harassment

- ▶ Bullying, humiliating or intimidating others
- ▶ Threatening violence or engaging in violent acts
- ▶ Displaying offensive materials or jokes
- ▶ Initiating unwanted physical contact
- ▶ Committing physical or verbal abuse
- ▶ Engaging in conduct of a sexual, racial or other nature that unreasonably interferes with an employee's work performance or creates an intimidating, hostile or offensive working environment

Discrimination

- ▶ Treating someone less favorably than others because of membership in a protected class
- ▶ Threatening dismissal or failing to promote based on membership in a protected class



We keep our workplace healthy, safe and secure

A healthy, safe and secure workplace is free from threats, violence, substance abuse and hazardous conditions.



Our commitment

We are committed to providing a safe and secure environment that promotes health and well-being. We do not tolerate violence, threats or weapons on company property. We follow laws and regulations about safety, and we ban illegal drug and alcohol use on company property.



Why it matters

The safety of every team member, customer and patient is essential. Taking steps to provide for a healthy, safe and secure environment aligns with our values and supports our commitment to each other.



Keeping our commitment

- ▶ **Follow** safety laws, regulations and WBA Policies.
- ▶ **Keep** your workspace free of hazards.
- ▶ **Report** any conduct that is unsafe.
- ▶ **Contact** authorities if you feel you are in immediate danger.
- ▶ **Do not** use drugs or alcohol at work in violation of WBA Policies.

Examples

Safe conditions

- ▶ Keeping store aisles and other passageways clear of unattended objects or trip hazards
- ▶ Immediately cleaning spills on the floor

Violence

- ▶ Never threatening or physically assaulting others
- ▶ Never bringing weapons onto company property

Substance abuse

- ▶ Prohibiting the use or possession in our workplace of illegal drugs, alcohol, cannabis or any other substance which would violate company policy, including prohibiting working while under the influence of such substances

Hazardous exposure

- ▶ Placing affected products into the proper disposal containers in a timely manner
- ▶ Following protocol for the safe disposal of hazardous materials

What should I do?

The doorbell to the receiving area rings three times while I am helping a customer. As I walk through the store, I see a cleaning product spilled in the aisle. Should I stop to clean the spill even though the delivery driver could be angry about the delay?

Everyone is responsible for safety, and a safe shopping and working environment is an essential priority. Cleaning liquid spills or removing tripping hazards is more important than routine tasks. First, put up the wet floor sign and then notify leadership on duty. Ask a team member to bring you cleaning supplies while you stand by the spill. Be sure to wear appropriate personal protective equipment and use the approved spill clean-up kit.



Our commitment to...
our customers and communities

We deliver safe, high-quality products and services

Safe, high-quality products and services help enable us to provide the highest standards of care for our patients and customers.



Our commitment

We only sell products and provide services that meet our high standards of safety and quality. We follow internal and external product safety rules, and so do our suppliers. We comply with applicable bans and recalls. We report defective or unsafe products immediately upon awareness.



Why it matters

The trust we have earned from our customers and patients is foundational to our business and continued success. We must continue to earn their trust by upholding our high ethical standards. One example is by offering safe, high-quality products and services.



Keeping our commitment

- ▶ **Follow** product safety laws and regulations.
- ▶ **Provide** quality, dependable services.
- ▶ **Require** suppliers to uphold our standards.
- ▶ **Report** defective products.

Examples

Product safety

- ▶ Removing recalled products from the store shelves rapidly
- ▶ Reporting health and safety concerns related to our products promptly
- ▶ Knowing and following applicable food safety requirements

Healthcare advice

- ▶ Referring patients and customers with healthcare questions to licensed professionals such as our pharmacists
- ▶ Only providing healthcare services from qualified professionals who follow ethical standards for their roles

Our reputation

- ▶ Delivering safe and reliable products that comply with applicable laws and regulations
- ▶ Sourcing high-quality products from ethical suppliers
- ▶ Respecting applicable age restrictions when selling products



We market our products and services openly and honestly

Marketing openly and honestly means we provide clear and accurate information to our customers while protecting personal information.



Our commitment

We are honest in our advertising and communications. We are truthful and do not make misleading claims about our business or that of our competitors. We are transparent to our customers and patients about how we use their personal data, and we provide this information in a way that is clear and easily understood.

We are committed to protecting the privacy of our patients, customers and team members. We handle personal information in a way that is both legal and ethical.



Why it matters

Trust is central to everything we do at WBA. Our patients and customers trust us to be honest in our communications and trust us with their personal information, including their health information. Every team member has a responsibility to maintain this trust and protect our patients and customers.



Keeping our commitment

- ▶ **Market** our products and services honestly.
- ▶ **Protect** personal information.
- ▶ **Understand and adhere** to laws and regulations about personal information.
- ▶ **Act** ethically when handling personal information and use extra care when dealing with sensitive information.
- ▶ **Report** misuse or loss of personal information.

Examples

Marketing

- ▶ Ensuring that our advertising and communications are clear, truthful and not misleading
- ▶ Respecting intellectual property rights, including in how we market our products and ideas
- ▶ Ethically designing and implementing technology-driven personalized marketing campaigns

Protecting personal information

- ▶ Adhering to privacy and security laws and regulations when using personal information
- ▶ Only sharing company information with third parties who meet or exceed our high standards
- ▶ Working with the WBA Privacy team within the Office of Ethics & Compliance to protect patient and customer privacy

What should I do?

I am concerned about my friend's health, and I would like to share some marketing materials with them on new medicines I think could help their condition. I know my friend fills their prescriptions at our pharmacies. Can I look up their name in our system to learn which medicines they are currently taking?

We respect the privacy of our patients, and we have an obligation to safeguard their confidential information. Our team members are only allowed to access patient information when necessary to complete their job responsibilities. Accordingly, you cannot research your friend's prescription records, and you would be subject to serious consequences for doing so.

We are committed to running a sustainable business

It is our responsibility to operate sustainably for people and the planet, act as caring corporate citizens and build an enterprise that is resilient for the future.



Our commitment

Our Environmental, Social and Governance strategy is centered in healthcare, which is aligned with our business operations, our expertise and our area of influence. We are committed to: engaging with local communities to improve community health and well-being; promoting equitable access to healthcare; protecting the planet by reducing waste and emissions; conducting business fairly and with integrity; driving responsible sourcing practices throughout our supply chain; and fostering a diverse, equitable and inclusive culture.



Why it matters

As a leading global pharmacy retailer, we have a central role in communities and as part of patient-care teams. We must be a force for good, responding to critical societal needs for access to healthcare, trustworthy information and innovative solutions.



Keeping our commitment

- ▶ **Improve** access to affordable, quality healthcare.
- ▶ **Reduce** energy consumption and emissions.
- ▶ **Drive** responsible sourcing practices and protect human rights.
- ▶ **Develop and market** healthier, more sustainable products and services.
- ▶ **Foster** a diverse, equitable and inclusive culture.

Examples

Healthy communities

- ▶ Providing lifesaving vaccines and life-changing vitamins to underserved communities
- ▶ Safely disposing of unwanted prescriptions to help fight opioid abuse
- ▶ Raising millions of dollars to fight cancer and child poverty

Healthy planet

- ▶ Investing in energy efficiency
- ▶ Implementing zero-waste programs

Sustainable marketplace

- ▶ Protecting human rights and promoting ethical standards in our supply chains
- ▶ Implementing programs to purchase from diverse suppliers
- ▶ Working to reduce unnecessary plastics in the packaging of our own brand products

Healthy and inclusive workplace

- ▶ Increasing diversity in leadership
- ▶ Hiring military veterans
- ▶ Running industry-leading disability hiring programs



Our commitment to...
our marketplace

We avoid conflicts of interest

A conflict of interest occurs when a competing personal interest interferes with, or may appear to interfere with, your work at WBA.



Our commitment

We act in the best interests of WBA and our customers. We do not let personal interests interfere, or even appear to interfere, with our professional responsibilities.



Why it matters

Conflicts of interest can cause significant harm to our company. Even the appearance of a conflict could put our company and reputation at risk. Making sound, unbiased decisions earns trust from our customers, our communities and each other.



Keeping our commitment

- ▶ **Recognize** potential conflicts of interest.
- ▶ **Avoid** real or perceived conflicts of interest.
- ▶ **Disclose** potential conflicts to your current manager.
- ▶ **Follow** requirements for reporting conflicts of interest.
- ▶ **Manage** conflicts, in cooperation with your manager.

Examples

Personal financial interests

Conflicts may include:

- ▶ Asking for or receiving payment, expensive gifts or entertainment from a WBA customer, business partner or competitor
- ▶ Owning more than a one percent share of a company that does business with or competes with WBA
- ▶ Using WBA business information to benefit yourself or a family member financially

Personal relationships

Conflicts may include:

- ▶ Supervising or hiring a family member or friend
- ▶ Dating someone you supervise
- ▶ Conducting company business with a family member

Outside work

Conflicts may include:

- ▶ Working as a consultant for a supplier
- ▶ Taking a job with a competitor of WBA
- ▶ Performing outside work that interferes with your WBA responsibilities

What should I do?

My spouse is the head of sales for a supplier that provides goods and services to WBA. Is this okay?

First, you must disclose the potential conflict to your manager. After discussion with your manager, the disclosure and actions taken must be documented. Refer to the Conflicts of Interest Policy for additional direction and complete the disclosure form as required. In this situation, you may refer your spouse's company to Procurement for further review. You must not be involved in any decision-making involving hiring or buying services from this company.

We conduct our business honestly and with integrity

We succeed on the strength of our products, services and people. We do not try to gain an advantage through unethical or illegal means.



Our commitment

We keep our interactions honest. We do not try to influence others by offering or accepting improper gifts or payments of any kind. In addition, we abide by antitrust and fair competition laws and regulations where we conduct business.



Why it matters

Doing business the right way strengthens our reputation and builds trust in the marketplace. Failing to do so could significantly impact our company and team members. Therefore, we must understand and follow the rules – even the appearance of impropriety must be avoided.



Keeping our commitment

- ▶ **Do not** offer or accept a bribe, kickback or other improper payment, gift or hospitality.
- ▶ **Follow** applicable anti-bribery and competition laws and regulations.
- ▶ **Be aware** of the rules, not only when dealing with government officials and healthcare professionals, but also with private parties.
- ▶ **Report** any unethical or dishonest behavior.

Examples

Avoiding improper payments

- ▶ Refusing requests for improper payments
- ▶ Reporting any request related to a bribe, kickback or other improper payment
- ▶ Only providing or accepting business courtesies (e.g., gifts and hospitality) in accordance with our policies and procedures

Competing fairly

- ▶ Refusing to agree to or discuss arrangements with competitors that would improperly restrict competition, including those related to pricing, customers and suppliers, sales, market allocation or strategic plans
- ▶ Refusing to facilitate improper agreements between competitors at other levels of the distribution chain, even if WBA does not compete with them
- ▶ Respecting the intellectual property and confidential information of our competitors and suppliers

What should I do?

I received an invitation from a supplier to visit its headquarters – located near a ski resort – for a meeting. Not only has the supplier offered to pay for my airfare, hotel and meals, but they also want to fly me to New York to speak at their annual sales meeting. They offered to pay for my daughter and me to stay the weekend. In addition, they even got us tickets to a sold-out show. This sounds great, but am I allowed to accept the supplier's offer?

Sometimes, it may be appropriate to accept travel from a supplier for business meetings. In this situation, however, you may not accept the lodging and entertainment for yourself or your daughter as it is more than a modest gift of hospitality. Review the Providing and Receiving Business Courtesies Procedure, and if you have questions, ask the Office of Ethics & Compliance team.

We comply with applicable financial laws and regulations

Our business involves financial transactions, which are subject to certain requirements, including those designed to prevent and detect money laundering. Money laundering involves disguising the true nature of funds, often to hide criminal activity.



Our commitment

We take steps to prevent and detect improper transactions that attempt to launder money or commit consumer fraud. We take steps to know our customers and speak up if something does not seem right. We also follow applicable laws and regulations related to financial products and services.



Why it matters

As a business, we are engaged in financial transactions and offer financial services. We have an obligation to do our part to prevent misuse of the financial system.



Keeping our commitment

- ▶ **Understand and comply** with anti-money laundering laws and regulations.
- ▶ **Report** suspicious financial activity and transaction details where required.
- ▶ **Coordinate** with Legal and the Office of Ethics & Compliance and cooperate fully in response to requests from regulatory and law enforcement agencies regarding actual or suspected money laundering activities.

Examples

Anti-money laundering

- ▶ Staying alert for financial transactions and cash payments that just do not seem right
- ▶ Reporting suspicious activity involving financial products like money transfers or gift cards
- ▶ Refusing to split apart orders, payments or contracts inappropriately

What should I do?

I am working at the register at one of our stores. A customer is trying to buy a large number of gift cards split up across multiple transactions with many different payment methods. They are in a rush and refuse to answer questions about their purchase or identity. This seems like a red flag to me. What should I do?

This situation is an example of suspicious activity that could be an indication of money laundering. It is important to follow applicable laws, regulations, policies and any prompts at the register. You should decline the transaction, report the situation to management and complete any required documentation about the situation.

We comply with applicable international trade laws and regulations

Our business is complex, highly regulated and often can involve international trade. Certain laws and regulations apply to these international transactions, covering topics including, but not limited to, import and export controls, anti-boycott and economic and trade sanctions.



Our commitment

We comply with applicable laws and regulations relating to the import and export of our products and services. We will not conduct business with individuals, entities, sectors or countries that are prohibited under any applicable sanctions rules.



Why it matters

WBA is a global business built on trust and our reputation for ethical business practices. Therefore, we must understand and comply with the rules that govern our activities in the places where we conduct business. Even an inadvertent failure to meet our responsibilities could harm our reputation and negatively impact our ability to accomplish our business objectives.



Keeping our commitment

- ▶ **Know** our business partners, so we do not transact with sanctioned parties or in prohibited locations.
- ▶ **Understand and follow** the rules governing our export and import activity.

Examples

Sanctions, import and export controls

- ▶ Understanding and complying with applicable import or export restrictions or licensing requirements in the location where you are conducting business for the company
- ▶ Avoiding doing business with any party who is sanctioned, blocked or located in a country prohibited by applicable sanctions rules
- ▶ Refusing to participate in unlawful boycotts



We deliver high-quality pharmacy and healthcare services

As a retail pharmacy and health and daily living destination, we hold an important place in our communities' healthcare ecosystem.



Our commitment

We comply with applicable pharmacy and healthcare laws and regulations around the globe. We support positive health outcomes by appropriately connecting our customers and patients to resources that support their health journeys.



Why it matters

Delivering high-quality healthcare while following applicable laws and regulations enables us to make a positive impact on the health and well-being of millions of people every day. In doing so, we are also winning the trust of our patients and customers and building on our strong reputation in the marketplace.



Keeping our commitment

- ▶ **Follow** applicable pharmacy and healthcare laws and regulations.
- ▶ **Serve** as trusted community health destinations, including to underserved populations.
- ▶ **Protect** confidential patient and customer personal information in accordance with data privacy laws and regulations

Examples

High-quality healthcare

- ▶ Updating our offerings with agility to respond to emerging health conditions and concerns
- ▶ Connecting patients and customers with convenient, equitable and affordable products and care
- ▶ Innovating and shaping the future of healthcare with the latest technologies

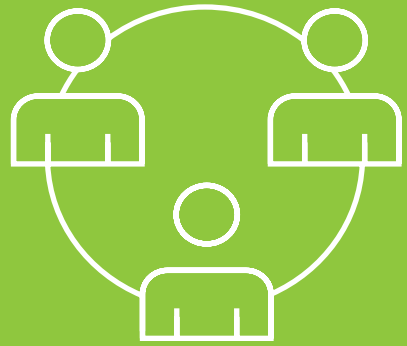
Healthcare compliance

- ▶ Abiding by laws and regulations related to dispensing, distributing and billing prescription medications
- ▶ Appropriately collaborating with other healthcare professionals and companies on the healthcare services we provide
- ▶ Maintaining valid licenses and certifications for the pharmacy and healthcare services we provide
- ▶ Viewing and sharing patient and customer information only when required and as permitted by privacy laws and regulations

What should I do?

I am a pharmacy manager, and I am reviewing a prescription for a regular customer. The prescription is missing the drug name. I have seen this customer and prescription several times in the past, so I could just look it up in the system. Should I fill the prescription?

Prescriptions must show the drug name before we can proceed with dispensing and billing for the prescription. A pharmacy team member must contact the prescriber to obtain the drug name (and any other missing information on the prescription). Once obtained, the pharmacy team member must document the missing information before proceeding with filling the prescription.



Our commitment to...
our partners

We choose suppliers with integrity

We engage suppliers who are aligned with our values and share our commitment to ethical business practices.



Our commitment

We work with suppliers who meet our high ethical standards for human rights and responsible sourcing. We support fair pay practices and the elimination of child and forced labor worldwide.



Why it matters

Respecting human rights and promoting health and well-being is central to our purpose and consistent with our core values.



Keeping our commitment

- ▶ **Follow** applicable WBA procurement, anti-bribery and anti-corruption, and ethical trading policies, procedures and other standards.
- ▶ **Conduct** due diligence as appropriate for the relevant type of supplier.
- ▶ **Hire** suppliers who are committed to human rights.
- ▶ **Never tolerate** forced or child labor or human trafficking in our supply chain.

Examples

Suppliers and sourcing

- ▶ Hiring suppliers who are committed to fair working conditions
- ▶ Partnering with suppliers who comply with labor, health and safety standards
- ▶ Sourcing from an equitable range of suppliers through our supplier diversity program
- ▶ Conducting ethical compliance assessments on new and existing suppliers



We adhere to laws relating to government contracts and programs

Government programs such as Medicare in the U.S. and the National Health Service (NHS) in the UK pay for many of the healthcare products and services offered through our retail and specialty pharmacies.



Our commitment

We uphold our high ethical standards when we appropriately submit claims and bill government programs. We follow applicable laws and regulations including accurately documenting the required information to bill for products and services that are provided to government healthcare program beneficiaries.



Why it matters

We demonstrate our integrity and build trust with our stakeholders by committing to compliance with standards, including those related to government contracts and programs. Our commitment aligns with our values and upholds our reputation in the marketplace.



Keeping our commitment

- ▶ **Uphold** requirements related to government-funded healthcare programs.
- ▶ **Comply** with applicable pharmacy and healthcare laws and regulations.
- ▶ **Engage** in compliant, accurate and timely billing practices.
- ▶ **Strengthen** collaborative partnerships with government regulators.

Examples

Government programs compliance

- ▶ Overseeing that public funds are used appropriately and in alignment with applicable requirements
- ▶ Submitting complete and accurate healthcare claims for reimbursement
- ▶ Identifying and promptly refunding overpayments received from government programs
- ▶ Comply with all applicable Medicare Advantage and Centers for Medicare & Medicaid Services (CMS) laws and regulations

What should I do?

I work in the pharmacy billing department and have been asked by my manager to submit immunization claims to a government program (e.g., Medicare Part B, NHS). I noticed that we have not obtained all of the required documentation that must be submitted with the claims. Should I proceed with submitting these claims?

No. You must inform your manager that we have not obtained all the documentation in order to submit these claims. Next, we must attempt to obtain the required documentation prior to submitting the claims. In the event we are unable to obtain the documentation, we may not submit these claims.

We maintain appropriate relationships with healthcare professionals

Healthcare professionals play a pivotal role in supporting our company in delivering quality pharmacy and healthcare services.



Our commitment

We understand and follow laws and regulations when interacting with healthcare professionals. We do not offer anything of value to healthcare professionals that could improperly influence them to refer or do business with WBA.



Why it matters

We maintain patients' and customers' trust in us by adhering to laws and regulations when interacting with healthcare professionals and do not take actions that might improperly interfere with the provider-patient relationship.



Keeping our commitment

- ▶ **Understand** and follow laws and regulations relating to interactions with healthcare professionals.
- ▶ **Keep** patient care decisions objective and free of undue influence.
- ▶ **Contact** the Office of Ethics & Compliance team or Compliance and Ethics Hotline for questions about appropriate provider relationships.
- ▶ **Disclose** any potential conflict of interests related to healthcare professionals.

Examples

Healthcare professional interactions

- ▶ Consulting with applicable policies for working with healthcare professionals
- ▶ Abiding by relevant spend thresholds for providing gifts, meals or other items of value to healthcare professionals





Our commitment to...
our shareholders



Walgreens Boots Alliance

We maintain accurate books and records

Our books and records explain and document the financial and operational details, history and decisions of our business. Examples include invoices, expense reports, inventory and pricing data, contracts and regulatory filings.



Our commitment

We strive to keep complete and accurate company records that fairly reflect our business, and we submit timely reports to government regulators. We follow applicable laws, regulations, accounting standards and WBA Policies related to our records. We do not improperly alter or misrepresent records, regardless of how small the change or amount may be.



Why it matters

Maintaining the accuracy and integrity of our books and records builds trust with our shareholders, regulators and other stakeholders who rely on this information. Following company accounting and record-keeping policies supports our ability to run our business efficiently and demonstrates our commitment to integrity.



Keeping our commitment

- ▶ **Keep** complete and accurate records.
- ▶ **Do not** improperly alter or destroy records.
- ▶ **Report** irregularities and violations.
- ▶ **Cooperate** with audits and investigations.
- ▶ **Follow** Internal Controls and Records Management policies.

Examples

Our books and records

- ▶ Accurately recording sales, expenses, corporate assets and liabilities
- ▶ Disclosing relevant details clearly and completely in financial reports
- ▶ Representing our financial operations honestly
- ▶ Reporting accounting irregularities
- ▶ Complying with legal holds for records subject to litigation or investigation
- ▶ Submitting detailed and accurate travel and expense reimbursement requests

What should I do?

We have fallen short of our third-quarter sales target because we could not close our last sale prior to the end of the quarter. My supervisor has asked me to backdate the transaction to meet the target. She said it is not a big deal and people do it all the time. Should I change the date?

No, it is dishonest and a crime to falsify our financial records. You should not change the date, and you should report this to the Office of Ethics & Compliance team or the Compliance and Ethics Hotline. If you do change the date, you and the company could face serious consequences.

We protect WBA assets

An asset is anything of value to the company. Our physical assets include records, computers, products and equipment. Our intangible assets include our brands, product lines, data, intellectual property and trade secrets.



Our commitment

We protect WBA's assets from damage, waste, loss, fraud and theft. We handle WBA assets responsibly, and we do not misuse company funds or property.



Why it matters

Our shareholders trust us to protect their investment by protecting WBA's assets. Keeping our costs low by minimizing the loss and misuse of our assets supports continued investment in our business and our purpose.



Keeping our commitment

- ▶ **Protect** WBA assets from damage, waste, loss, fraud, theft and misuse.
- ▶ **Follow** protocol for keeping our physical and intangible assets secure.
- ▶ **Report** losses related to our assets.

Examples

Safeguarding assets

- ▶ Following applicable laws, regulations and WBA Policies to handle WBA funds honestly and responsibly
- ▶ Preventing theft and misuse of our data, copyrights, patents, trademarks, trade secrets and logos
- ▶ Respecting the proper use of assets or property of colleagues, customers or business partners
- ▶ Recognizing WBA's rights to assets created with WBA time or money



We comply with insider trading laws

Insider trading occurs when someone illegally uses material, non-public information when trading in stock or other securities. “Material” means the information would be important to someone who is considering buying, selling or holding a stock or other security. “Non-public” means the information has not been shared widely with the public. Examples of material, non-public information include financial results, potential sales, mergers and acquisitions, significant contracts, major litigation and joint ventures.

Insider trading can also occur when someone discloses material, non-public information to others, including friends and family, to use for their own financial benefit. This is called tipping.



Our commitment

We do not trade on or improperly share material, non-public information. We follow insider trading and securities laws and regulations, and we handle material, non-public information in accordance with applicable requirements. We forbid insiders from using or disclosing material, non-public information for personal gain.



Why it matters

We uphold trust by operating honestly and fairly in the market. Insider trading is illegal and unethical, and it violates WBA Policies. Insider trading violations can result in termination of employment and civil and criminal penalties, including fines or even imprisonment. When we respect the rules of the market, we stand by our values and demonstrate our commitment to integrity.



Keeping our commitment

- ▶ **Comply** with WBA’s Insider Trading Policy.
- ▶ **Keep** material, non-public information confidential.
- ▶ **Never** use material, non-public information for personal gain.
- ▶ **Ask** for guidance from the Legal department if you have questions.

Examples

Insider trading compliance

- ▶ Never tipping friends and family with material, non-public information
- ▶ Trading legally and ethically using only public information
- ▶ Understanding quarterly trading blackout periods for applicable team members

What should I do?

I saw a “confidential” folder on my manager’s desk at the end of this quarter. I wanted to know if we met our goals, so I opened the folder. It was actually a memo about an upcoming merger, but it will not be public knowledge for a week. My father is passionate about the stock market, so I suggested he buy the stock of our new company before everyone else hears about the merger. Is this okay?

No, this is considered insider trading. You have put yourself, your manager, your father and the company at risk. There are significant civil and criminal penalties for insider trading, which can include imprisonment. You should not have opened the folder and should not have shared the confidential information with your father.

We safeguard confidential and proprietary information

WBA is committed to protecting personal and confidential information that we collect in the course of doing business where unauthorized disclosure, compromise or destruction could provide significant advantages to a competitor or result in serious adverse financial or reputational harm to WBA.



Our commitment

We manage confidential information with integrity, and we follow data privacy laws and regulations. We respect the privacy of our patients, customers, team members and partners, and we use their information appropriately. We protect confidential and proprietary information in accordance with information security standards. Nothing in our Code is designed to limit the ability of our U.S. team members to discuss terms and conditions of employment such as pay, benefits, schedules or workloads as protected by U.S. laws and regulations.



Why it matters

Our proprietary information, such as our intellectual property, is crucial for sustaining our business today and in the future, so we must safeguard it. If this information is improperly accessed or disclosed, we could lose certain competitive advantages or areas of company value.

Our patients and customers also trust us with their personal information, such as their prescriptions, and our shareholders trust us to protect confidential information, such as our internal business details. When we maintain the trust of our patients, customers and shareholders, it builds our reputation and enables our business to thrive.



Keeping our commitment

- ▶ **Protect** confidential and proprietary information.
- ▶ **Prohibit** unauthorized access to information, including by third parties.
- ▶ **Follow** WBA Policies and instructions on good information security practices.

Examples

Safeguarding information

- ▶ Viewing patient information only when it is needed for your job
- ▶ Preventing unauthorized parties from accessing, using or transferring confidential and proprietary information
- ▶ Accessing, storing and sharing information only as permitted

What should I do?

I received an urgent email appearing to be from my manager directing me to a link to upload documents related to a project. The email states that we need to provide the documentation immediately in order to meet an important deadline. I do not want to be responsible for causing a delay that could harm our company, but the link and the email address it came from are not familiar to me. Should I proceed with responding to the request?

Even if an email appears urgent, it is important to take the time to examine if the message is legitimate prior to responding or clicking on links. Steps such as validating that the sender's email address and links appear correct prior to taking action can help prevent unauthorized parties from gaining access to WBA's information. You should not take action on the email until after confirming its legitimacy with your manager and/or the applicable Information Security team in accordance with company policy.

We communicate responsibly

Communication is anything we, as a company, convey through spoken or written words or images. It includes internal emails, articles and anything we say publicly to investors, analysts, the media or on social media. Responsible communication aligns with our company culture, reflects our core values and follows our communication guidelines.



Our commitment

We are responsible and professional in how we communicate – internally and externally. We are mindful of our reputation, and we only allow authorized representatives to communicate externally on behalf of WBA. We require our team members to follow WBA Policies when representing us, including on social media. We understand when we may be seen as communicating on behalf of the company as opposed to as an individual, and we ask for guidance and approval from Corporate Communications if we are unsure.



Why it matters

Our reputation influences behaviors and perceptions and is key to maintaining trust among our stakeholders, patients and customers. When we communicate responsibly with messages that are clear, transparent and consistent, this strengthens our reputation and builds trust in WBA.



Keeping our commitment

- ▶ **Communicate** responsibly, and keep in mind how our messages may be perceived.
- ▶ **Follow** WBA Policies for communication.
- ▶ **Direct** inquiries to authorized WBA representatives.
- ▶ **Protect** our company’s reputation.

Examples

Responsible communication

- ▶ Acting as a spokesperson for WBA only with official approval from Corporate Communications
- ▶ Directing shareholder questions to Investor Relations, and media inquiries to Corporate Communications
- ▶ Never posting confidential WBA Information, as defined in our Information Classification Policy, on internal/external mass communication and social media channels
- ▶ Following WBA Policies when identifying yourself as someone who works for WBA on social media

What should I do?

Today a patient yelled at me when his prescription was not ready. I informed him that his doctor had not sent us his refill information, so we could not legally fill the prescription. The patient created a scene, so one of our pharmacy team members started a live-streaming video on social media. Our team member just wanted to document the incident, but the video got hundreds of likes and shares. Some people even tagged the WBA corporate account. Was it a good idea to post that video?

No. The video should not have been streamed, recorded or shared. Posting this video disrespected the patient, violated our policies and could cause legal issues. We must respect our patients and their privacy, both in-person and online.

Resources

Senior Vice President, Global Chief Compliance and Ethics Officer:
Matt D'Ambrosio
+ 1 847 964 6519

Visit WBA Worldwide or your local intranet for your Human Resources or Legal Contacts and applicable policies.

Compliance and Ethics Hotline

The Compliance and Ethics Hotline allows WBA team members to report ethics and compliance concerns by phone or web, 24 hours a day, seven days a week. The hotline is managed by an independent third party with operators in many languages. You may remain anonymous, and we will make every effort to protect confidentiality as allowed by law.

Online portal

wba.ethicspoint.com

Phone

- Chile** 1230 020 8964
- Germany** 0800 1809032
- Hong Kong** 800 964 909
- Italy** 800 909 716
- Mexico** 800 099 0306
- Republic of Ireland** 1 800 903 328
- Switzerland** 0 800 895 268
- Thailand** 1 800 012 642
- United Kingdom** 0800 088 5554
- United States** 855 WAG CODE (855 924 2633)
- United States** (No. 7 Beauty Company) 844 709 4047



Waivers

The company may consider a request for a waiver of limited elements of our Code in rare circumstances. A request for a waiver must be submitted to the SVP, Global Chief Compliance and Ethics Officer. Any waiver for a director or an executive officer must be approved by the Board of Directors and will be disclosed to shareholders. Any waiver requested by other team members may be subject to the approval of the General Counsel or the Chief Executive Officer.

The Code has been translated into other languages but, if discrepancies occur in the text, the English version will prevail. Businesses may adapt this Code for local use provided the revisions remain equally comprehensive and do not result in any inconsistency with or lessening of any of the principles, standards or obligations stated in this Code. An advance copy of any adaptations must be forwarded for approval to the Global Chief Compliance and Ethics Officer prior to implementation.