



CODE OF CONDUCT

THE WAY WE DO BUSINESS





A MESSAGE FROM OUR CEO

Dear Colleagues,

We have many reasons to be proud of our company, none of which would be possible without the commitment of our colleagues and our culture of Core Beliefs that guide our achievements, actions and behaviors every day.

We've built our reputation at Zoetis through hard work and the uncompromising integrity of our colleagues. But it can be easily damaged when even one colleague loses their way and violates **our Code of Conduct** -- the ethics that direct our way of doing business with colleagues, customers and other stakeholders.

Acting with integrity is essential to Zoetis, and our success depends on your sustained personal commitment:

- We run our business in line with our Core Beliefs — Our Colleagues Make the Difference; Always Do the Right Thing; Customer Obsessed; Run It Like You Own It; and We Are One Zoetis.
- We 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.

- We provide innovative, high-quality products and solutions that help our customers care for animals and solve their most pressing business needs.
- We create an inclusive workplace where all colleagues feel valued, and where the health, safety and well-being of our people is a top priority.
- And, we deliver our business results in compliance with all applicable laws and regulations.

Our Shared Responsibilities

Our Code of Conduct is a resource for putting your integrity to practice consistent with our expectations for lawful and ethical business conduct.

I am counting on every Zoetis colleague to read and understand this document. When you're faced with a tough choice or challenging situation, I encourage you to refer to our Code of Conduct and Core Beliefs to help you do the right thing. I also strongly encourage you to reach out and speak up if you see anything that seems to violate our standards. Our entire Zoetis Executive Team is committed to fostering an environment in which all colleagues can feel comfortable raising what they believe to be honest issues to any level of leadership without fear of reprisal. We have zero tolerance for any form of retaliation against colleagues who raise good faith concerns about actual or potential violations. This is a commitment we all take seriously and personally.

Maintaining the integrity of our business and protecting our reputation is everyone's responsibility. Thank you for your attention to our Code of Conduct and for living our Core Beliefs in what you do every day.

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.

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

ALWAYS DO THE RIGHT THING

CUSTOMER OBSESSED

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

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

RUN IT LIKE YOU OWN IT

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

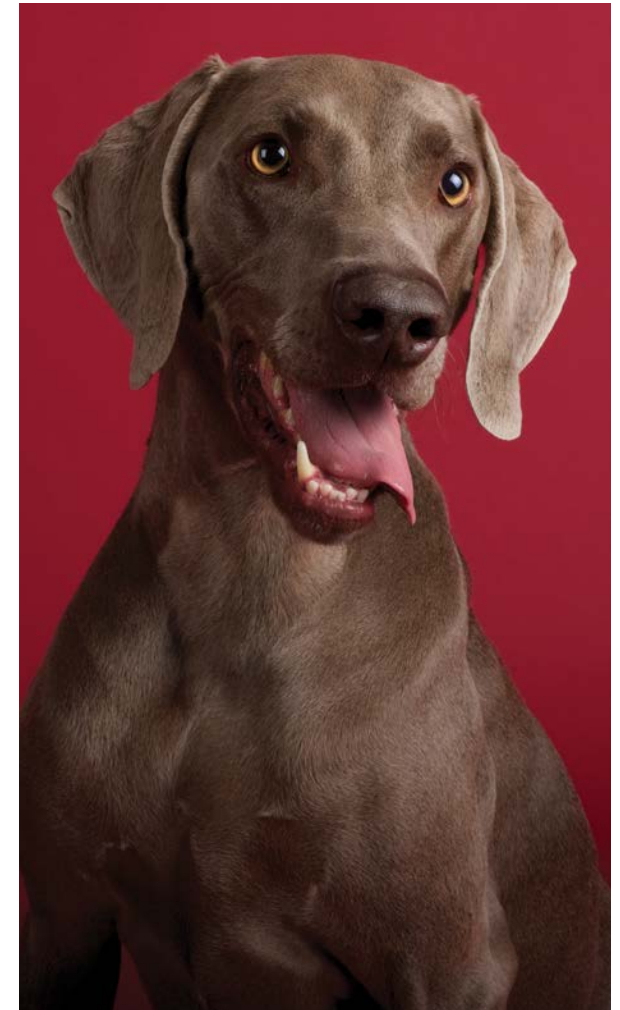
Everyone who works at Zoetis must follow our Code of Conduct as well as our Corporate Policies and Procedures; this includes all colleagues, officers and directors. Any waiver of the provisions of the Code of Conduct for executive officers may be made only by the Board of Directors.

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 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 **Zoetis Compliance Helpline** by phone or online via the web-reporting tool.
 - Compliance Helpline Number (U.S. and Canada): 1-855-322-9944
[Click here](#) to find the Compliance Helpline numbers for Zoetis locations outside the U.S. and Canada
 - Compliance Helpline Web-Reporting Tool: <https://zoetis.ethicspoint.com>



HOW TO USE THE COMPLIANCE HELPLINE

Our Compliance 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 Compliance Helpline 24 hours a day, 7 days a week. The Compliance Helpline is operated by specially trained third-party ethics and compliance representatives.

When you contact the Compliance 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 Chief Compliance Officer 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 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. In some instances however, during the course of investigations, information may be shared on a need-to-know basis and 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](#)
- [Protecting Private Information](#)
- [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

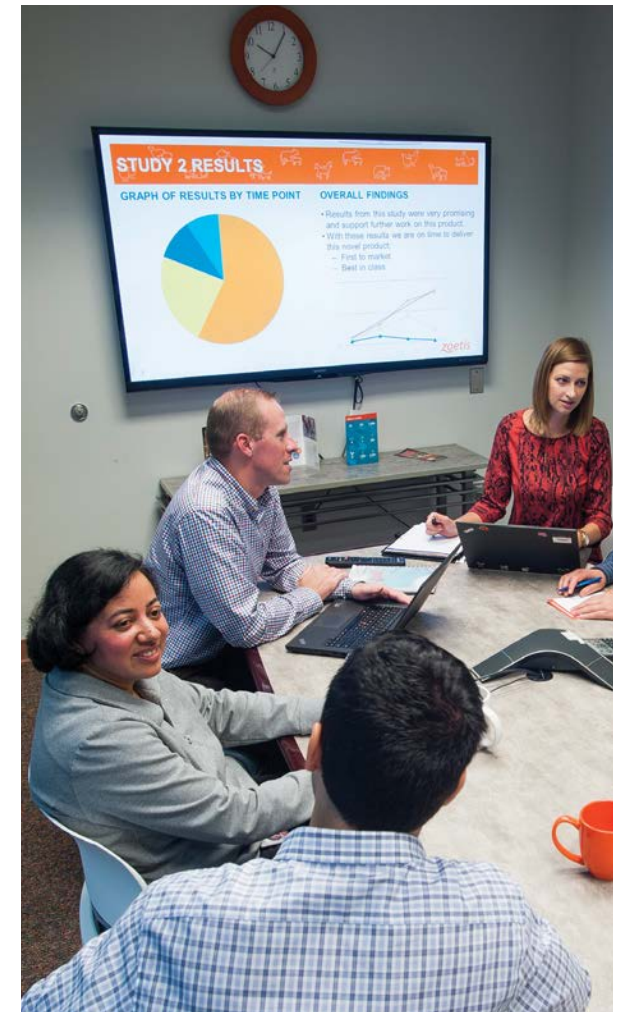
All of the following can be instances of harassment and are not tolerated at Zoetis:

- 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:

- ▶ Workplace Environment, Incidents and Business Continuity Management Policy

PROTECTING PRIVATE INFORMATION



We respect the privacy of colleagues, as well as others with whom we conduct business. Always handle personal information (i.e., name, address, phone numbers, email addresses, physical attributes, prescriber information, as well as information on an individual's opinions or beliefs) with care and in accordance with Company policy.

Data privacy laws cover how we must collect, store, use, share, transfer and dispose of personal information, and we comply with those laws everywhere we operate. In addition, certain research and business activities may involve the review of personal information. It is Zoetis' policy to keep this information confidential and secure in accordance with applicable laws.

- Ensure that the personal information you process is safe, secure and accurate.
- Collect, access and use personal information for legitimate business purposes only, and limit the collection to information that we really only need.
- Use care when you provide personal and confidential data to anyone inside or outside of the Company and limit access to authorized individuals.

- Allow individuals whose personal data is held by the Company to review and correct the information.
- Personal information should not be retained 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 personal 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 to avoid situations that can lead to even the appearance of a conflict of interest. If you find yourself in a potential conflict of interest situation, talk with your manager. Depending on the circumstances, some conflicts may be resolved if they are proactively disclosed and handled properly.

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 or 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 for yourself a business opportunity 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 or working on a campaign or other election-related activities, may present a potential conflict of interest in some situations.



LEARN MORE:

- ▶ [Conflict of Interest Policy](#)

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 Entertainment](#)
- [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 applies, 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 and completed response forms from Zoetis-sponsored marketing programs, or 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 new 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 others who administer, prescribe, purchase or recommend prescription medications.

- 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.

GIFTS AND ENTERTAINMENT

An occasional gift or offer of 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 entertainment 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 entertainment 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 entertainment, 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.
- There must be a reasonable business purpose.

The following practices are never allowed:

- Giving or accepting lavish or frequent gifts or entertainment.
- Giving or accepting any gift of cash or a cash equivalent (gift cards, gift certificates).
- Giving or accepting any gift or entertainment that could be embarrassing or reflect negatively on our reputation or your reputation.

- Giving or accepting any gift or entertainment that violates the policies of the recipient's organization.
- Giving or accepting gifts or entertainment of any kind to a government official unless specifically authorized by the Legal function.



GIFTS AND ENTERTAINMENT – GOVERNMENT OFFICIALS

Extra care needs to be taken when dealing with government officials as there are complex rules governing the giving of gifts, entertainment 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 entertainment, can be offered to government officials.
- 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 function.



LEARN MORE:

- ▶ Interactions with Animal Healthcare Professionals Policy
- ▶ Anti-Bribery and Anti-Corruption Policy
- ▶ Travel and Entertainment Policy

FAIR DEALING WITH STAKEHOLDERS

We strive to be fair and ethical in all our dealings with stakeholders. We never 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 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 — 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 talk with or signal our competitors about any aspect of our pricing, sales volumes, customers or territories or exchange competitively sensitive information with competitors.
- Never coordinate with customers 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 or antitrust 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

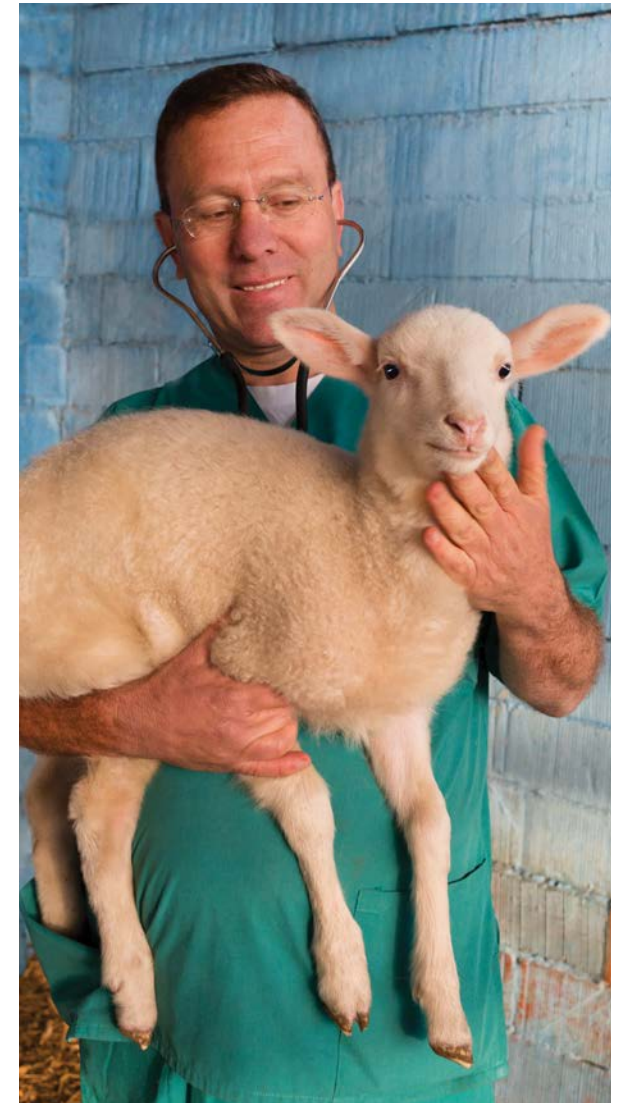
Trade association meetings and other industry gatherings serve legitimate and worthwhile purposes. However, these meetings pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition law obligations. 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 Compliance 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 the Legal function or the Internal Audit 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, 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 Entertainment Expense Reimbursement 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 Entertainment 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

The unauthorized release of confidential information can cause us to lose our competitive advantage, embarrass Zoetis or damage our relationships with our customers and third parties.

For these reasons, confidential information must be treated carefully. This means it must be accessed, stored and transmitted in a manner consistent with our policies and procedures.

- Use and disclose confidential information only for legitimate business purposes.
- 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 disclose information to third parties without appropriate authorization and any required confidentiality agreements. If in doubt, check with your manager or the Legal function.
- 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”).

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, nonpublic 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 or sell any stocks, bonds, options or other securities of any company, including Zoetis, based on material, nonpublic information.
- Do not pass on material, nonpublic information or “tips” to others.
- Know the kinds of information considered inside information. Examples include nonpublic information about mergers or acquisitions, sales or earnings results, financial forecasts, changes to the executive management team, pending material lawsuits or major business wins or losses, to name just a few.
- If you have any questions about whether information is material and nonpublic, contact the Legal function.

DEFINITIONS

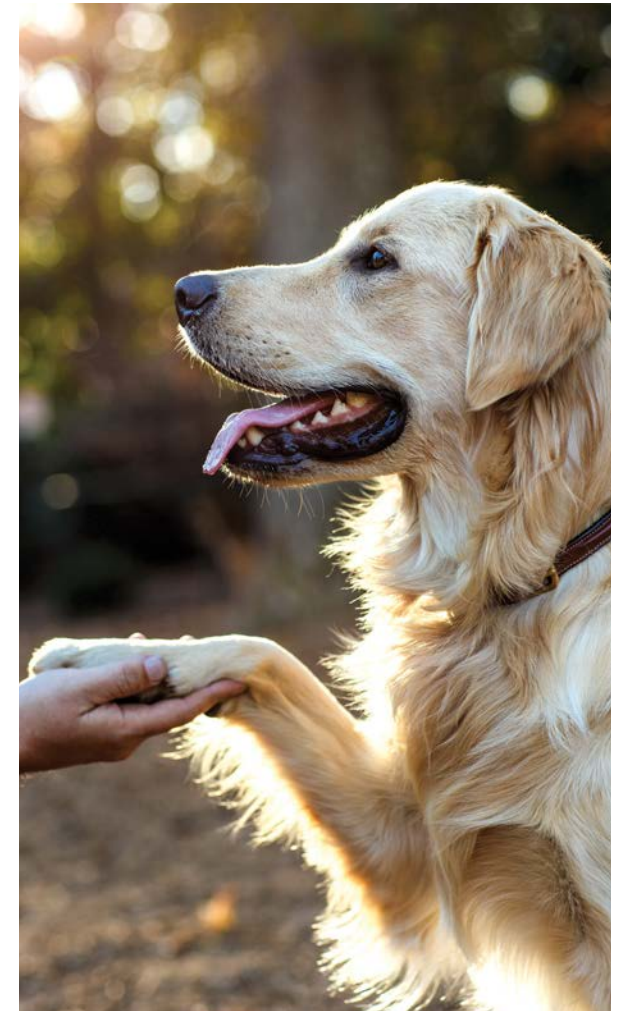
Information is **material** if it is likely that an investor would buy or sell a security as a result of having that information.

Information is **nonpublic** if it has not been released broadly to the public, for example, through widely disseminated company communications, press releases, external websites and/or regulatory filings.



LEARN MORE:

- ▶ Treatment of Material Nonpublic Information and Trading in Company Stock 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

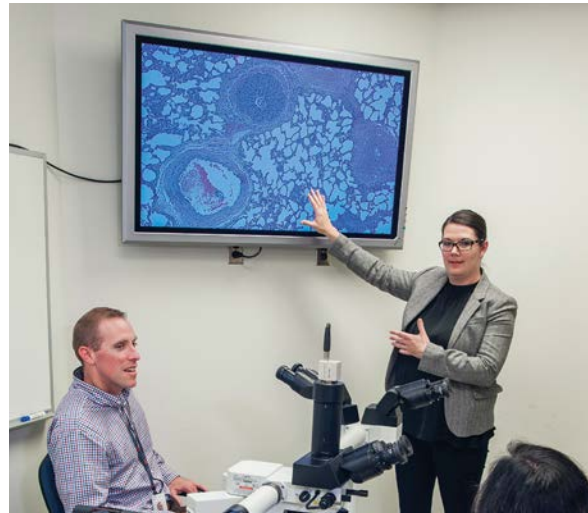
SPEAKING ON BEHALF OF OUR COMPANY

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; enhancing the sustainability of animal agriculture; and enriching the lives of our customers, colleagues and communities around the world.

- [Serving Our Communities](#)
- [Human Rights](#)
- [Environmental 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 support for 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.

- If you volunteer to help charitable organizations, we ask colleagues to be sure that your participation does not interfere with your ability to meet your work obligations.
- 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 committed to respecting the human rights and dignity of everyone, and we support international efforts to promote and protect human rights. We will not tolerate abuse of human rights in our operations or in our supply chain.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking and forced labor:

- Report any suspicion or evidence of human rights abuses 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:

- ▶ www.zoetis.com



ENVIRONMENTAL SUSTAINABILITY



Zoetis is committed to using the world's resources wisely and growing our business in a way that is considerate of the global community. We protect the environment and the health and safety of our colleagues and the communities in which we operate.

Zoetis Global Risk Management is responsible for setting our standards and supporting our site Environmental Health and Safety (EHS) teams and businesses. All colleagues are expected to take responsibility for EHS compliance.

- Be actively involved in highlighting issues that could potentially impact the environment, health or safety. Be proactive and look for ways that we can reduce waste and use energy and natural resources more efficiently.
- Report concerns about potential EHS non-compliance to your manager, to your local EHS team, or by using any of the other reporting methods listed in this Code.



LEARN MORE:

- ▶ Workplace Environment, Incidents and Business Continuity Management Policy

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 — 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. In some countries our veterinarian customers and other animal healthcare professionals may be considered government officials and additional requirements may apply.

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 business or a financial or commercial advantage. A bribe can be something other than cash. A gift, 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.

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

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.

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.



LEARN MORE:

- ▶ [Political Contributions Policy](#)



HELPFUL RESOURCES

REPORTING A CONCERN

Compliance 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>

CHIEF COMPLIANCE OFFICER

Jeff.Williams@zoetis.com
+1-973-822-7000

CHIEF PRIVACY OFFICER

Privacy@zoetis.com
+1-973-822-7000

LEGAL DEPARTMENT

Legal@zoetis.com
+1-973-822-7000

HUMAN RESOURCES

ZoetisColleagueServices@zoetis.com
+1-855-984-7463

CORPORATE COMMUNICATIONS

ZoetisCommunications@zoetis.com
+1-973-822-7000

COMPLIANCE CHAMPIONS

Click here to find a Compliance Champion in your region/country
