



**AMPHASTAR PHARMACEUTICALS, INC.
CODE OF CONDUCT**

Dear Employee, Director, Officer, and Agent,

Upholding our legacy of integrity remains central to delivering quality products to our clients and patients. For our business to thrive, we count on each other to act fairly and ethically in our day-to-day interactions. Doing so sustains trusted relationships, protects our reputation, and enables us to deliver products that do what we say they will do. For guidance on acting with integrity, we look to our Code of Conduct (COC), which describes expectations for ethical behavior and compliance with applicable laws and regulations. We have updated our COC to make clearer that not only will we treat each other with respect, in keeping with our fairness principle, but also that we will address behaviors inconsistent with our principles and values.

To ensure we maintain an environment where all of us can do our best work, we rely on you to speak up and raise concerns when you encounter practices inconsistent with our ethical standards or noncompliant with the law. Please discuss any concerns with your Supervisor, HR, or any member of our Legal team. You may also contact the Amphastar Ethics & Compliance Hotline.

Amphastar Pharmaceutical, Inc.

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INTRODUCTION: OUR COMMITMENT TO ETHICS AND INTEGRITY

LONG-TERM VIEW

At Amphastar (or, the “Company”), our commitment to high ethics and integrity is vital to taking a long-term view. We believe that our reputation and culture are critical to our success as a Company and that our fundamental values should never be sacrificed for short-term gain. Above all, we are committed to doing the right thing in all our business dealings.

Our Code of Conduct (“COC”) is designed to deter wrongdoing and to help to strengthen our commitments by reinforcing the importance of maintaining strong relationships with our stakeholders—such as our fellow employees, customers, suppliers, and communities. Our COC applies to all directors, officers and employees (who, unless otherwise specified, will be referred to jointly as “Employees”) of Amphastar, as well as any Amphastar contractors, consultants and agents.

Our COC guides how we act with each other and how we present ourselves to those outside our Company. Our COC promotes fair and accurate financial reporting, compliance with applicable laws, rules and regulations, prompt internal reporting of violations of our COC, honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest, and a culture of honesty and accountability. Conducting business ethically, responsibly, and legally throughout our global

organization helps to protect our reputation and the successful Company we have built.

While our COC cannot address every circumstance we encounter at work, it can help us decide when and how to seek help. Use it as a guide, but know you can always turn to additional resources if you still have questions. The Company expects Employees to use good judgment and adhere to the high ethical standards to which the Company is committed. Our COC is just one of the tools available to help ensure we are acting with integrity.

OUR COMMITMENT

Employees are expected to read the policies set forth in our COC and ensure that they understand and comply with them. Please direct any questions about our COC or the appropriate course of conduct in a particular situation to the Human Resource (“HR”) or Legal team, who may consult with the Company’s outside legal counsel or the Company’s board of directors (the “Board”), as appropriate.

All of us at Amphastar share a commitment to follow our COC. We are each expected to be familiar with and follow its principles and seek guidance if we are unsure how to act. In addition, we need to know and follow the laws and regulations that apply to our work, wherever we do business.

If a conflict exists between our COC, another Amphastar policy or procedure, or an applicable law, regulation, industry code,

or other relevant code of conduct, the more restrictive requirements shall apply. If there is a discrepancy between local law and our COC or policies, seek advice from both the HR or Legal teams before taking action.

Just as we are committed to pursuing business success by creating innovative products, we need to pursue our objectives while following Amphastar's COC and policies.

We expect the same ethical commitment from our business partners that we expect

from our fellow Employees at Amphastar. This means that Amphastar suppliers, agents, distributors, consultants, licensees, vendors, and other business partners are responsible for conducting their business in a legal and ethical manner, reflecting similar principles to those outlined in our COC. If you encounter situations that concern you, please raise your concern with any of the resources provided in our COC.

MAKING OUR COMMITMENT A REALITY: COMPLIANCE AND REPORTING

RAISING QUESTIONS AND CONCERNS

Why is it important to report ethical concerns?

Amphastar takes all reports of ethical concerns very seriously. If an Employee knows of or suspects a violation of our COC, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), or an Employee has concerns about a situation that they believe does not reflect the Company's culture and values, the Employee must report it immediately. After all, our Company can't take action unless someone raises the issue.

Since our COC can't address every situation that could arise during our work, it is up to each of us to use good judgment and common sense to make sure our concerns are known.

Resources

There are a number of resources you can turn to if you become aware of questionable behavior or action that concerns you:

- Your Supervisor
- An HR Associate
- The Amphastar Legal team
- Our Ethics & Compliance Hotline
- The Chairman of the Board of Directors

Often, your Supervisor can advise you on how best to report a concern and/or direct you to the best resource.

You can access our Ethics & Compliance Hotline by phone or online, 24 hours a day, seven days a week, to ask questions, express concerns, or report possible violations.

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law.

You can find more information about our Ethics & Compliance Hotline, including the telephone number, at <https://amphastar.ethicspoint.com>.

Good faith reporting and non-retaliation

Amphastar is committed to creating an atmosphere of non-retaliation, where all of us feel comfortable speaking up when we have concerns. You may always make a good faith report of any suspected violation of our COC, other Amphastar policies, or the law without fear of retaliation or any negative impact on your employment.

The Company does not permit retaliation of any kind for good faith reports of violations or possible violations and anyone who engages in retaliation for good faith reports of violations will be subject to disciplinary action.

Investigations and corrective actions

Reported violations will be promptly and thoroughly investigated. As a general matter, the Board will oversee investigations of potential violations by directors or executive officers, and the Human Resource and/or the Legal team will oversee investigations of potential violations by other Employees.

As Employees, we have a shared duty to cooperate fully in any investigation. However, it is imperative that the person reporting the violation not conduct an investigation on their own. Employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Employees should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, Employees are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided by our COC or applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

SANCTIONS

Employees who violate our COC may be subject to disciplinary action, up to and

including, but not limited to, termination of employment. Moreover, Employees who direct or approve of any conduct in violation of our COC, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates our COC or directs or approves conduct in violation of our COC shall be subject to disciplinary action as determined by the Board.

Furthermore, violations of some provisions of our COC are illegal and may subject Employees to civil and criminal liability.

SPECIAL EXPECTATIONS FOR MANAGERS

Team managers have additional responsibilities for creating an ethical culture. In particular, managers are expected to model our culture, lead by example, and foster an environment of honesty and integrity. Further, they must help other employees understand and comply with our COC and encourage Employees to ask questions and raise concerns. When others raise concerns, our managers should handle their questions and reports appropriately. This means never taking or tolerating retaliatory action against anyone for speaking up in good faith, and contacting a member of the HR or Legal team for help when needed.

DISCLOSURE

Nothing in our COC limits or prohibits Employees from engaging for a lawful purpose in any “Protected Activity.” “Protected Activity” means filing a charge

or complaint, or otherwise communicating, cooperating or participating, with any state, federal or other governmental agency, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission and the National Labor Relations Board. Notwithstanding any other policies in our COC (or elsewhere), Employees are not required to obtain authorization from the Company prior to disclosing information to, or communicating with, such agencies, nor are Employees obligated to advise the Company as to any such disclosures or communications.

Notwithstanding, in making any such disclosures or communications, Employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant government agencies. "Protected Activity" does not include the disclosure of any Company attorney-client privileged communications; any such disclosure, without the Company's written consent, violates Company policy.

RELATIONSHIPS BUILT ON TRUST: WORKING WITH FELLOW EMPLOYEES

DIVERSITY AND NON-DISCRIMINATION

Amphastar strives to maintain a work environment in which all individuals are treated with respect and dignity. Our different backgrounds, cultures, and talents give each of us a unique perspective that strengthens our business. Having many points of view helps our teams develop more creative ideas and ways of reaching our goals. In short, Amphastar is stronger because we respect and value diversity.

We require each Employee to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice and harassment. We prohibit discrimination against or harassment of any team member on the basis of race, religion or religious creed (including religious dress and grooming practices), color, ethnic or national origin, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), nationality, national origin, ancestry, immigration status or citizenship, age, physical or mental disability, medical condition (including genetic information or characteristics, or those of a family member), military service or veteran status, marital status or family care status, sexual orientation, family medical leave, gender (including gender identity, gender expression, transgender status or sexual stereotypes), political views or activity, status as a victim of domestic violence,

sexual assault or stalking, or any other basis or classification protected by applicable federal, state or local law.

Any Employee who is found to have discriminated against another Employee is subject to discipline up to and including termination.

HARASSMENT

Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited. We value relationships built on trust. Harassment, intimidation, and bullying will not be tolerated at Amphastar.

Harassment can take many forms and means different things in different parts of the world. At Amphastar, harassment is any intimidating, offensive, demeaning or unwelcomed conduct that creates a hostile, uncomfortable environment for others and any other forms of harassment prohibited by

applicable law. It can be verbal, physical, virtual, or visual. Harassment can also be sexual in nature. No matter what form it takes, harassment has no place within Amphastar.

If you experience or witness any form of disrespectful, biased or intolerant behavior, discrimination, harassment, intimidation, or bullying, you are encouraged to report it to your supervisor or a member of the HR or Legal teams or the Ethics & Compliance Hotline. Remember, Amphastar will not tolerate retaliation against you for coming forward with a good faith report.

Managers who become aware of behaviors reflecting intolerance, discrimination, or harassment on their team are expected to work with their designated HR partner and other functional experts as needed to address and resolve the situation.

WORKPLACE SAFETY

Amphastar values the health and safety of all Employees, which is why our Company works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. We owe it to each other to keep our workspaces free of hazards so that we can work in a clean, safe, and productive environment.

Employees are responsible for complying with all applicable laws, rules and regulations governing health, safety and the environment.

Tim, an Employee in one of our production facilities, notices that a machine he works with isn't calibrated correctly, so its product measurements are a little bit off. The discrepancy is very small, and Tim figures he can just make do with it for the rest of the day, instead of bothering anyone about it. Is he doing the right thing?

No. Tim should talk to his supervisor immediately about the problem with the machine. By not addressing this issue, Tim could be lowering our product quality or even endangering his fellow Co-workers. All of our equipment must be kept in good working order and properly calibrated, so we can avoid injury and create the products we promise our customers. Even if it means stopping production briefly to repair a machine, we all need to follow proper safety and manufacturing protocols.

Workplace violence

We also keep our workplaces safe and productive by not tolerating threats or acts of violence. Violent behavior—including both spoken and written threats, as well as intimidation and attempts to instill fear in others—is not tolerated at Amphastar. If you think someone is in imminent danger, immediately call Amphastar Security or local authorities.

Substance abuse

To keep ourselves and our fellow Employees safe, we need to be alert while we're on the job. We must never perform work or act on behalf of our Company while under the influence of drugs, alcohol, or any controlled substance that could impair our ability to make sound judgments and perform our duties.

ALL IN THE SAME BOAT: MAKING GOOD COMPANY DECISIONS

PROTECTING AMPHASTAR'S ASSETS

Physical property, funds, facilities

We each play a role in protecting Amphastar property—such as equipment, supplies, facilities, and funds—from loss, misuse, theft, damage, and waste. Access to certain assets may require prior approval.

All Employees should endeavor to protect Amphastar's assets and ensure their efficient use. Any suspected incident of fraud or misuse, theft or loss of laptops or other assets should be reported immediately to your supervisor or a member of the HR or Legal team along with Amphastar's Security team for investigation. In the event the misuse of assets is identified, appropriate action will be taken, including disciplinary action up to and including termination.

In the office supply room, Jonathan notices a few old computer monitors that no one is using. He could really use another monitor for his home computer, and he's pretty sure no one will notice if he takes one. Is Jonathan allowed to take a monitor?

No, he is not. Jonathan may not take the Amphastar property for his personal use without appropriate approval, even if it is not currently being used in the workplace. If a fellow Employee is misusing Amphastar property, you should speak up about your concerns. We all have a responsibility to protect our Company and its assets.

Use of Amphastar property and assets

Employees should treat Company owned equipment with care and responsibly use the equipment and tools with the Company's interests in mind. Employees should not change or disable security settings on Company assets, and Employees should not use computer systems and software that are not authorized by the Company. Employees should also use good judgment in using Company assets for personal matters. The Company permits reasonable personal use of Company owned equipment, but Employees should be aware that all electronic information and equipment remain the sole property of the Company.

Remember to compose emails, instant messages, and text messages with the same care you would take in composing any other Amphastar document. Electronic messages can easily be copied and forwarded without your knowledge or consent. Remember that discriminating or harassing comments and threatening or abusive language is unacceptable in any communications using Amphastar's systems—just as it would be in person.

Confidential information and intellectual property

One of our most important assets is our knowledge and experience. In carrying out our business, Employees may learn confidential or proprietary information about the Company, its customers, suppliers or

business partners. Confidential or proprietary information of the Company, and of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

Our confidential information can take many forms, for example:

- Customer lists
- Marketing and strategic plans
- Terms and conditions, rates, or fees offered to specific customers
- Formulas and technical information
- Intellectual property such as trade secrets or unsubmitted patent applications
- Financial Results

Because our confidential information and the confidentiality of other companies is critical to our business goals, Employees must maintain the confidentiality of information about the Company and other companies entrusted to them by the Company, use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and outside the Company, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

How can I protect Amphastar's confidential information?

- Never disclose trade secrets or any confidential information unless there's a legitimate, authorized business reason for doing so and proper documentation is in place.
- Ensure that appropriate legal protection is used, such as a confidential disclosure agreement.
- Always properly secure your computer, documents, and other sensitive materials.
- Avoid discussing confidential information in places where you may be overheard, such as restaurants, taxis, airplanes, or elevators.
- Remember that these obligations continue even after your employment with Amphastar ends.

Amphastar's continued success also depends on our research and development efforts. These efforts involve creating and using intellectual property, including trade secrets. To the extent permitted by law, any invention or other intellectual property you create during working hours, with Amphastar resources, or as part of your work, belongs to our Company.

We should be mindful of the intellectual property rights of others. For example, if we license the use of third-party intellectual property, particularly software, we need to be careful that our use does not violate any applicable licensing requirements. Similarly, we may not use software or any other information that has been pirated or stolen in any way.

The obligation to protect confidential information does not end when an Employee leaves the Company. Any questions about whether information is confidential should be directed to your supervisor or the Legal team.

Social media and messaging apps guidelines

When using social media, it's very possible that we may encounter situations where we're unsure what and how much to say about our work at Amphastar.

The most important guideline may also be the most obvious: as an Amphastar Employee, you must be careful not to disclose confidential Amphastar information through social media. You also need to be clear that, though you work for Amphastar, your opinions are your own. And finally, always remember to use good judgment online, considering the potential impact of your words before posting.

In addition, communicating through instant messaging or communications apps, platforms, or tools ("Messaging Systems"), including text or WhatsApp, may create a risk that Amphastar information is not appropriately maintained or is less secure. Employees are responsible for ensuring compliance with Amphastar policy, as applicable.

CREATING AND RETAINING ACCURATE RECORDS

Most of us, in some way, are responsible for creating and maintaining business records. Examples of business records include timekeeping records, contracts, invoices and

receipts, documentation of services rendered, inventory records and incident reports, among other documents.

Employees must maintain all of the Company's books, records, accounts and financial statements in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely.

FINANCIAL REPORTS AND OTHER RECORDS

Employees are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non-financial information that may be material to the Company to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with government agencies or releases to the general public.

Each Employee involved in the Company's disclosure process must familiarize themselves with the disclosure requirements applicable to the Company and the business and financial operations of the Company, and must not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators and self-regulatory organizations.

Furthermore, Employees must ensure that all books, records, accounts and financial statements conform both to applicable legal requirements and to the Company's system of internal controls. Employees must

carefully and properly account for all assets of the Company. Employees may not establish any undisclosed or unrecorded account or fund for any purpose. Employees shall not make any false or misleading entries in the Company's books or records for any reason, or disburse any corporate funds or other corporate property without adequate supporting documentation and authorization. Employees shall not misclassify transactions related to accounts, business units or accounting periods. Each Employee bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

MAINTAINING AND MANAGING RECORDS

The Company is required by local, state, federal, foreign and other applicable laws, rules and regulations to retain certain records and to follow specific guidelines in managing our records. Records include all recorded information, regardless of medium or characteristics. Civil and criminal penalties for failure to comply with such guidelines can be severe for Employees, agents, contractors and the Company.

Additionally, please note that all Company issued devices, computers, hardware, cell phones, media, documents, records and information are the property of the Company. As such, the Company requires Employees to cooperate with any request made by the Legal team to preserve or produce any documents, records, information, devices, computers, hardware, cell phones or other media. Employees should consult with the Legal team regarding the retention of records in the case

of an actual or threatened litigation or government investigation. The Legal team will notify an Employee if a legal hold is placed on records for which such Employee is responsible.

A legal hold suspends all document destruction procedures in order to preserve appropriate records under special circumstances, such as litigation or government investigations. The Legal team determines and identifies what types of records or documents are required to be placed under a legal hold.

If a legal hold is placed on records for which Employees are responsible, Employees must preserve and protect the necessary records in accordance with instructions from the Legal team. Records or supporting documents that are subject to a legal hold must not be destroyed, altered or modified under any circumstance.

A legal hold remains effective until it is officially released in writing by the Legal team. If an Employee is unsure whether a document has been placed under a legal hold, they should preserve and protect that document while they check with the Legal team.

If Amphastar is being investigated or is involved in a lawsuit, we will issue a legal hold to be sure that documents related to the investigation or lawsuit are preserved.

CONFLICTS OF INTEREST

As Employees, we are responsible for making decisions and taking actions that are in the company's best interest and not based on personal relationships or benefits. Fundamentally, “the Company” is all of us who act with an owner’s mindset and share in the benefits of our continued success.

Together, we are responsible for sustaining an engaging Company built on inclusiveness, striving to be fair with each other and everyone with whom we do business. As part of that commitment, some boundaries are necessary between Employees’ personal and business interactions to achieve a productive and comfortable work environment.

A conflict of interest is a situation where our personal interests (or those of our close family members) could or actually interfere with our ability to serve Amphastar’s best interests. In these situations, the danger is that the conflict could encourage us to show favoritism toward a person or organization at the expense of our Company. As Employees, we have a duty to work on Amphastar’s behalf, and conflicts of interest can put that commitment into question.

Accordingly, you should avoid situations where your personal activities and relationships conflict, or appear to conflict, with the Company’s interests.

Employees must always disclose conflicts of interest, whether they are actual, perceived, or potential. Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. Employees should seek guidance from their

supervisor or HR when they have any questions or doubts.

If you are aware of an actual or potential conflict of interest where you or someone else’s interests may conflict with the Company’s interests, or you are concerned that a conflict might develop, you should discuss with your supervisor or HR and then obtain approval from the Legal and Finance teams before engaging in that activity or accepting something of value.

The following are some of the more common types of conflicts that should be avoided.

Family Members

Employees may not conduct business on behalf of the Company with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to, and authorized by, the Company and is a bona fide arms-length transaction. “Family members” include a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and any person (other than a tenant or Employee) sharing the household of an Employee.

Outside employment

Amphastar generally does not limit your ability to hold jobs outside the Company, although written approval may be required. If you choose to pursue another job or an independent business venture, be sure it doesn’t interfere with your Amphastar commitments or your obligations under the law. Check with your supervisor if you are unsure whether employment with another

company or an independent business venture will pose a conflict of interest. Employees should not have an undisclosed material financial interest in a competitor, supplier, customer or business partner of the Company.

Financial interest

If you (or a family member) have a substantial financial interest in an organization that competes with our Company or works with Amphastar as a business partner (for example, a supplier, vendor, or contractor), you may feel pressured to favor the outside organization over Amphastar in your business decisions. This pressure to favor the other organization means that an actual or potential conflict likely exists. If you find yourself in such a situation, you should disclose it to your direct supervisor or a member of the Legal team.

Relationships in the workplace

Conflicts of interest can arise based on the activities of third parties in significant relationships (e.g., domestic partners, dating relationships, etc.). An actual or potential conflict of interest occurs when an individual is in a position to influence a decision that may result in a personal gain for that individual as a result of business dealings with the Company (e.g., a personal relationship with a subordinate Employee or vendor). In addition, personal or romantic involvement with a competitor, supplier or subordinate Employee of the Company creates an actual or potential conflict of interest.

It is especially important to disclose relationships with Healthcare Professionals and Government Officials in order to navigate those engagements with proper care and diligence.

An Employee that is involved in any of the types of relationships or situations described should immediately and fully disclose the relevant circumstances to their manager or HR for guidance about whether a potential or actual conflict exists.

Please see the “Close Personal Relationships in the Workplace” guidance located in the HR Office.

CORPORATE OPPORTUNITIES

Except as otherwise set forth in our certificate of incorporation and bylaws, Employees owe a duty to the Company to advance the Company’s business interests when the opportunity to do so arises. Employees are prohibited from taking or directing to a third-party to take, a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. Employees are further prohibited from competing with the Company directly or indirectly during their employment with the Company and as otherwise provided in any written agreement with the Company.

Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. You should discuss with your supervisor or HR if you have questions.

INSIDER TRADING

Under federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Because Employees will have knowledge of specific confidential information that is not disclosed outside the Company which will constitute material nonpublic information, trading in the Company's securities or in the securities of those companies with which the Company does business by Employees or persons Employees provide material nonpublic information to could constitute insider trading, violating the law. It is an Employee's responsibility to comply with these laws and not to share material nonpublic information.

- Never buy or sell Amphastar stock or stock of any other public company that does business with Amphastar if you have material, non-public information about Amphastar or such public company.

- Never directly or indirectly share material, non-public information with others.
- Remember, these rules continue to apply for a period of six months after your employment with Amphastar has terminated.
- Read and understand the Amphastar Insider Trading Policy.

Any Employee who is contacted by a member of the financial community, the press or any other outside organization or individual, should refer them to a member of the Corporate Communication Team. Any questions on overall business trends, business in different geographies, pricing, suppliers, new products or technologies, lawsuits or disputes or any other aspects of the Company's business should be referred to the Corporate Communication Team.

FAIRNESS IN OUR BUSINESS RELATIONSHIPS

ANTI-BRIBERY AND ANTI-CORRUPTION

The Company has a “zero tolerance” policy and strictly prohibits all forms of bribery and corruption, regardless of whether they involve a public official or a private person. Bribery and corruption are antithetical to the Company’s commitment to operating with the utmost integrity and transparency and are also prohibited under the laws of most countries around the world, including pursuant to laws such as the United States Foreign Corrupt Practices Act of 1977 and the United Kingdom Bribery Act of 2010. Employees should seek guidance from the Legal team when they have any questions.

A bribe can be money or anything of value, including but not limited to:

- Cash or a cash equivalent (e.g., gift cards, etc.)
- Gifts or Discounts
- Entertainment
- Travel or hospitality
- Charitable or political contributions
- Business or employment opportunities

In addition, we never solicit or accept improper kickbacks. A kickback is the return of a sum already paid or due to be paid as a reward for awarding or fostering business. The difference between an illegal kickback and legitimate rebates or discounts may appear minor but is very important. Please consult with your supervisor or a Legal team member if you have concerns or questions.

Amphastar does not pay facilitation payments, even if we work in locations where they may be legal or common practice. A facilitation payment is a payment made to expedite a standard government service, such as processing a permit, providing police protection, or expediting utility services

All of these requirements apply to any third party engaged on behalf of Amphastar, making it important to monitor the individuals and companies hired by our Company carefully.

If you are solicited regarding improper activity or are compelled to make an extortion payment under imminent threat of physical harm, you must report this to the Legal Team as soon as possible.

Third Parties

Amphastar seeks to work with Third Parties that share our commitment to conducting business ethically. Third Parties are defined and may include but not be limited to distributors, agents, and dealers. Amphastar prohibits any Third Party from engaging in bribery or corrupt practices on Amphastar’s behalf. Third Parties must adhere to the same ethical standards as Employees. In addition, as applicable, Employees must follow all requirements to engage with Third Parties, such as anti-bribery and anticorruption due diligence and ethics certifications and training.

BUSINESS COURTESIES

We do not try to obtain or retain business by offering, paying for, or arranging business courtesies such as meals, travel, entertainment, or gifts as improper inducements.

Business Courtesies may only be provided in connection with legitimate scientific, educational, and/or business activities. Employees must ensure business courtesies are in accordance with applicable Amphastar policies, applicable laws, regulations, or industry-specific guidelines. All Business Courtesies should be infrequent and modest. No cash or cash equivalent, such as gift cards, may be provided.

When working with Government Officials and Healthcare Professionals, certain laws limit or prohibit providing gifts and entertainment to Healthcare Professionals and Government Officials. As Employees, we are responsible for knowing these restrictions, understanding the applicable Amphastar policies, and consulting with appropriate Employees, including the Legal team, as needed.

These requirements also apply to any Third Party providing business courtesies on Amphastar's behalf as well as any Employee receiving any Business Courtesies.

Tom is coordinating a renovation of an Amphastar facility, and he forgot to file a permit with the government. Without this permit, he can't open the facility on time, and the delay will increase Amphastar's investment in the project. When he goes to the government office to see if they can expedite the permitting process, the agent tells Tom that there's nothing she can do— unless Tom makes a donation to her daughter's school. Tom knows this is not a standard service charge, but he needs to get that permit.

What should he do?

Tom cannot pay this money to her daughter's school. This payment would qualify as a bribe, which Amphastar prohibits. To conduct business ethically and legally, we cannot offer bribes, whether in the form of cash, payments to a third party. If you are ever offered or asked to make a bribe, tell a member of the Legal team immediately.

FAIR COMPETITION AND ANTITRUST

Antitrust laws (or, as they are known in most of the world, “competition” laws) are designed to foster competitive markets and prohibit activities that unreasonably restrain trade. In general, actions taken in combination with another company that unreasonably reduce competition may violate antitrust laws. Certain types of agreements with competitors (including, but not limited to, agreements on prices and output) are always illegal and may result in criminal penalties such as prison terms for the individuals involved and large fines for the corporations involved. In addition, unilateral actions by a company with market power in the sale or purchase of a particular good or service may violate antitrust laws if

those actions unfairly exclude competition. As a result of the numerous antitrust laws and enforcement regimes in various jurisdictions inside and outside the United States, at times it is possible that certain actions may simultaneously violate some jurisdictions' antitrust laws while not violating other jurisdictions' antitrust laws.

Always exercise caution when attending trade events, seminars, or industry conferences or participating in trade association activities. If one of Amphastar's competitors attempts to discuss any of these topics with you, stop the conversation immediately, walk away and report the incident to a member of the Legal Team.

We are dedicated to complying with the numerous laws that govern competition. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and Employees should reach out to the Legal team before taking any action that may implicate these laws whenever appropriate.

Gathering and handling competitive information about others

Sometimes we have access to information about our competitors that could give Amphastar a business advantage. We must act legally and ethically at all times with respect to this information.

When seeking a competitive advantage, use only publicly available information you obtain lawfully and ethically. Even if it may be legal to use competitive information, it may not be ethical to do so.

We should never exchange sensitive and confidential information with a competitor.

If confidential information about a competitor is deliberately or inadvertently disclosed to you, you should discuss its disclosure with the Legal team.

An Employee, Carlos, wants to analyze a competitor but realizes direct discussions with the competitor would be inappropriate. The Employee decides to hire an independent market research firm to contact the competitor and obtain the information. Is this acceptable?

No. Using a third party to conduct work that Amphastar Employees should not conduct ourselves is the same as directly contacting the competitor. Entering a discussion with a competitor is a waterline issue requiring leadership consultation in advance.

PRIVACY

Our Company is committed to protecting the privacy of personal or otherwise sensitive information—that of our fellow Employees and our customers, vendors, patients, and other third parties. Protection of personal privacy is a key part of maintaining fairness in our business relationships, and as such, it is very important to us here at Amphastar.

Personal information is any information that can be attributed to or used to identify an individual, such as:

- Contact information
- Employment history
- Marital status
- Government-issued identification numbers
- Credit and debit card numbers
- Consumer data

The use of such information is governed by our policies and procedures and any contracts or agreements we have in place with our third parties. Various privacy laws also protect it. Therefore, it is important that we understand how to identify personal information and protect it from accidental or unlawful disclosure, destruction, alteration, or other improper or unauthorized use or access. We must ensure that we provide the appropriate notice as to how we will use the personal information we collect and that we use it only for those purposes unless we receive the subject's consent to use it differently.

If you are a “data owner” at Amphastar—meaning you authorize or control access to certain data and are responsible for its accuracy, integrity, and completeness—you have a responsibility to ensure this information is properly and securely stored, transferred, and utilized. In all situations, it is important that you limit access to consumer data and personal information that our Company owns, controls, or processes. You should help ensure that the information is used only for its intended business purpose, never sharing it with anyone inside or outside of Amphastar who is not authorized to access it and does not have a work-related need to know it.

Finally, if you are working with any third parties on Amphastar's behalf, it is your responsibility to ensure those parties handle personal information appropriately, in line with any governing laws, contractual requirements, or non-disclosure agreements. For more information, see our Privacy Policy. If you have any questions about the

use or disclosure of personal information or suspect that unauthorized access to or misuse of personal information has occurred, you should immediately notify your leader of the Legal team.

PRODUCT INTEGRITY

We are committed to product integrity and seek to build our products to do what we say they will do. In developing and manufacturing our products, we have established and intend to comply with standards that meet the requirements of applicable laws and regulations. If you have a concern about the quality of our products or processes, please bring it to a manager's attention.

INTERACTING WITH A GOVERNMENT ORGANIZATION

Special laws and regulations apply when interacting with a government organization or an organization that contracts with a government organization. Whether we are selling products to a government customer, submitting new product data to a government agency, or are involved in other ways, we have extra responsibilities in these situations. They include:

- Following the laws that restrict giving gifts, hospitality, and entertainment can be stricter for Government Officials than for our other business partners. (Please also see the Business Courtesies section.)
- Ensuring all reports, certifications, and statements to the government are current, truthful, accurate, and complete.

- Assigning all time allocations and costs to the proper category and the appropriate contract.
- Knowing and complying with all contract requirements.

In certain situations, you may have contact with a Government Official or be asked to provide information on Amphastar’s behalf to a government or regulatory agency in connection with an inquiry or investigation. Because it is vital to ensure that you have all the information you need and that all such information is accurate and appropriate for the purpose, speak to the Legal team before providing any non-routine information to a government or regulatory agency on behalf of our Company.

In addition, all employment offers should be based on merit and not performed as a personal and/or business “favor.” Offering employment to a Government Official or a person connected with a Government Official(s) may present a risk of bribery or corruption, and HR and/or Legal should be consulted in advance.

U.S. ECONOMIC SANCTIONS COMPLIANCE AND EXPORT CONTROLS

Amphastar requires compliance with laws and regulations governing trade in both the United States and in the countries where the Company conducts its business. A number of countries maintain controls on the export of hardware, software and technology. Some of the strictest export controls are maintained by the United States against countries and certain identified individuals or entities that the U.S. government

considers unfriendly or as supporting international terrorism. Some of these controls include:

- Restrictions on the export and reexport of products, services, software, information or technology that can occur via physical shipments, carrying by hand, electronic transmissions (*e.g.*, emails, distribution of source code and software) and verbal communications;
- Sanctions and embargoes that restrict activities including exports, monetary payments, travel and the provision of services to certain individuals (including individuals and entities included in, and owned or controlled by an individual or entity included in, the List of Specially Designated Nationals & Blocked Persons, the Sectoral Sanctions Identifications (SSI) List or Foreign Sanctions Evaders List maintained by the Office of Foreign Assets Control of the U.S. Department of the Treasury or any other applicable list of sanctioned, embargoed, blocked, criminal or debarred persons maintained by any U.S. or non-U.S. government, the European Union, Interpol, the United Nations, the World Bank or any other public international organization relevant to Company business), companies and countries;
- International boycotts not sanctioned by the U.S. government that prohibit business activity with a country, its nationals or targeted companies; and
- Imports of products that are subject to the importing country’s customs laws and regulations, which apply regardless

of the mode of transportation, including courier shipments and carrying by hand.

Employees must comply with all applicable trade controls and must not cause the Company to be in violation of those laws. If an Employee becomes aware of any information suggesting that the Company has or may in the future engage in a

transaction that could violate applicable economic sanctions, they should report this information to the Legal team immediately. In addition, please consult the Legal team in relation to any proposed export of Company products or services.

TAKING THE LONG-TERM VIEW IN OUR COMMUNITIES

ENVIRONMENTAL RESPONSIBILITY

At Amphastar, we are committed to meeting all applicable health, safety, and environmental regulations and standards. We carefully consider the effects our products—and our operations as a whole—have on the environment and the health and well-being of people. We strive to be good stewards of air, water, and energy resources and in our management of waste.

If you have concerns about a potential environmental issue related to our products, processes, or facilities, immediately bring it to the attention of our Environmental, Health and Safety (EHS) Coordinator. Amphastar will investigate or review all reports and take corrective action when necessary.

POLITICAL ACTIVITIES

The Company does not make contributions to political candidates or political parties, except as permitted by applicable laws.

Employees engaging in political activity will do so as private citizens and not as representatives of the Company. An Employee's personal lawful political contribution, or decision not to make a contribution, will not influence the Employee's compensation, job security or opportunities for advancement.

WAIVERS, AMENDMENTS OF OUR COC

WAIVERS

Any amendment or waiver of any provision of our COC must be approved in writing by the Board or, if appropriate, its delegate(s), and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of our COC for the principal executive officer, principal financial officer, principal accounting officer, controller, or any other persons performing similar functions in the Company will be promptly disclosed to stockholders if and as required by applicable law or the rules of the stock exchange on which the securities of the Company are listed.

AMENDMENTS

The Company reserves the right to amend our COC at any time, for any reason, subject to applicable laws, rules and regulations.