



Dear Fellow Employee:

AMRI's success has been built on a reputation for the highest quality standards in our work and our ethics. We are committed to maintaining these standards and the current environment we have all developed.

The AMRI "Code of Ethics and Business Conduct Guidelines" outlines the Company's high ethical standards and details how AMRI employees should conduct themselves when dealing with fellow employees, customers, suppliers, competitors, and the public at large. I ask that you read the code carefully and refer to it often for guidance. It is your personal responsibility to comply with it in all respects.

Honesty, integrity, and a commitment to high standards of ethical and moral conduct are integral to the core values of AMRI. I would like to thank you in advance for your support in upholding these standards and continuance in building the fine reputation of our businesses.

Sincerely,

Bill Marth  
President and CEO



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## CODE OF ETHICS AND BUSINESS CONDUCT GUIDELINES

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## CODE OF ETHICS AND BUSINESS CONDUCT GUIDELINES

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### INTRODUCTION

Albany Molecular Research, Inc (“AMRI” or “the Company”) is committed to maintaining the highest business ethics and standards. In order to preserve the integrity of AMRI’s business and the manner in which we are perceived by co-workers, customers, suppliers, competitors, and the communities in which we live and work, it is imperative that each employee conduct his or her business and personal affairs in compliance with AMRI’s Code of Ethics and Business Conduct Guidelines.

This booklet contains AMRI’s Code of Ethics and Business Conduct Guidelines (collectively referred to as the “Code”). The Code discusses ethical and legal principles that must guide all of AMRI’s employees in their work. In order to be useful, this booklet should be kept handy and reviewed from time to time. However, the Code does not cover every situation that may arise, and is not intended to provide final answers in all matters. General questions or issues regarding the Code may be discussed with the employee’s manager, Vice President of Human Resources, or the Corporate Compliance Manager. However, questions of *interpretation* of the Code should be directed to the Vice President of Human Resources or the Corporate Compliance Manager.

#### **Applicability of the Code: Conflict with Foreign Laws**

The Code is applicable to all directors, officers, employees and agents of AMRI, its subsidiaries, and controlled affiliates regardless of location (collectively referred to as “the Company”). As an international business, the Company is affected by the laws and business customs of the countries in which it operates. Each employee, wherever located, is responsible for conducting his or her business activities in compliance with the Code and the laws of the foreign country in which he or she works. When an employee believes a conflict exists between the Code and the laws of a particular foreign country, he or she should bring the conflict to the attention of the employee’s manager and the Human Resource Representative for the employee’s operating group.

In some countries, business practices are based on less stringent or different codes of conduct than the Company’s. For business dealings in such countries, employees should follow the Code, unless variances that are permitted by applicable law are based on sound business judgment and have been approved in advance by the Chief Executive Officer of the Company. All requests for variances should be directed to the Vice President of Human Resources or the Corporate Compliance Manager.

### **Employee Responsibilities**

Ethics and behavior are individual responsibilities. High standards of behavior are expected of all employees, regardless of position or location. No supervisor has the authority to require or permit conduct that is in violation of the Code or any law

### **Management Responsibilities**

All managers are responsible for seeing that Company policies are followed. Every manager is responsible for communicating Company policies to his or her employees, including those dealing with legal and ethical behavior. Managers and supervisors also are responsible for maintaining a work environment where constructive, frank, and open discussion is encouraged and expected, without fear of retaliation.

The Chief Executive Officer of the Company and management at all levels throughout the Company are responsible for ensuring adherence to the Code and for ensuring that there is appropriate ongoing employee communication, guidance, and training. Violations of the Code may be reported to the Audit Committee of the Company's Board of Directors.

## **1.0 CONFLICT OF INTEREST GUIDELINES**

### **1.1 General**

The Company is committed to conducting its business in accordance with the highest ethical standards and has adopted the ethical principles set forth below as corporate policy. It is the Company's policy that no director, officer, or employee should place himself or herself in a position where his or her actions, personal interests, or the activities or interests of those for whom he or she acts are, or are likely to be, in conflict with the interests of the Company. The purpose of the Conflict of Interest Guidelines is to assist the Company and its directors, officers, and employees in avoiding situations in which personal activities and financial affairs may conflict with their responsibility to act in the best interests of the Company. There is no intent to invade individual privacy, but rather to identify possible problems or areas of concern that could be resolved if known.

There may well be cases in which an apparent conflict of interest is more theoretical than real, but it is important to resolve such cases promptly. In cases of doubt, for the protection of both the Company and the individual, the director, officer, or employee should fully disclose the nature of the proposed conduct or transaction before it is undertaken. See Section 3.0: "Confirmation of Compliance and Reporting" below.

Some actions under the Conflict of Interest Guidelines require the prior approval of the Company. This approval means the written consent of the Vice President of Human Resources and the Vice President of Legal Affairs of the Company.

### **1.2 Specific Guidelines**

#### **1. Gifts and Contributions**

While the Company does not prohibit usual and customary business meals and entertainment or other small gratuities of nominal value given or received in connection with the usual conduct of the Company's business affairs, the following guidelines should be abided by:

Directors, officers or employees, or any member of their immediate families:

- a. Are not to give or accept, directly or indirectly, gifts, contributions, or prizes having a value greater than \$50.00 USD or equivalent local value, which are in any way connected with the business of, or matters involving the Company. In the event a gift is received with a value greater than \$50.00 USD the gift should be shared, when possible, among members of the department and communicated to the Corporate Compliance Manager;
- b. Are prohibited from soliciting gifts, contributions, gratuities, services, or kickbacks from suppliers or customers of the Company, regardless of their value;
- c. May not accept the use of customer or supplier property, airplane transportation or trips (including trips sponsored by customers or suppliers) without the prior approval of the Vice

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President of Human Resources or Corporate Compliance Manager. In the case of Vice Presidents and members of the Board of Directors, the Chief Executive Officer must approve and;

- d. Are not to give or accept, directly or indirectly, entertainment in excess of usual and reasonable limits that are a normal and acceptable part of regular business activity. For example, tickets to sporting events, lunches, dinners, golfing events, and entertainment may be accepted if modest and appropriate and are consistent with normal business customs.

## **2. Loans**

Directors, officers or employees, or members of their immediate families, may not loan money to, or borrow money from, individuals or concerns that do business with or compete with the Company, except transactions with banks and other financial institutions in accordance with normal business practices.

## **3. Purchase or Sale of Goods and Services**

Directors, officers, employees, or members of their immediate families, may not benefit personally from any purchase by or sale to the Company of goods or services or derive personal gain from transactions involving the Company, including the sale or lease of real or personal property, except when that transaction and the personal interest involved have been fully disclosed to and approved by the Company.

## **4. Corporate Opportunities**

Employees, officers and directors owe a duty to AMRI to advance its legitimate business interests when the opportunity to do so arises. Each employee, officer and director is prohibited from:

- diverting to himself or herself or to others any opportunities that are discovered through the use of AMRI's property or information or as a result of his or her position with AMRI, unless such opportunity has first been presented to, and rejected by AMRI,
- using AMRI's property or information or his or her position for improper personal gain, or
- competing with the Company

## **5. Direct or Indirect Business Interests**

Directors, officers, or employees, or members of their immediate families may not have any direct or indirect interest in any enterprise, which competes with the Company or which has current or prospective business with the Company, when that individual may be able to influence such business with the Company, except when the interest has been fully disclosed to and approved by the Company. Ownership of or interest in publicly traded securities that is not in excess of one percent (1%) of the securities of that corporation is not subject to this paragraph.

**6. Association with Competitors, Suppliers, or Customers**

Directors, officers or employees, or members of their immediate families, without the prior disclosure to and approval of the Company, may not (i) work for, serve as a director or officer of, or provide services to, a customer, supplier, or competitor of the Company, or a customer of the Company's customer, or (ii) be a partner of or investor with any individual or organization, or an employee of an organization that is the Company's customer, supplier or competitor, or that is a customer of the Company's customer.

**7. Non-Company Service and Income**

A director or officer of the Company, a group or division president or vice president, or a general manager of a business unit shall not serve as an officer, director, employee, partner, trustee or consultant of or receive salary, fees, dividends, or other income (except dividends and interest from publicly traded securities or other similar investments) from any enterprise other than the Company, unless that relationship has been fully disclosed to the Vice President of Human Resources or the Corporate Compliance Manager. It is not necessary to disclose service as an officer or a director of a not-for-profit enterprise.

**8. Outside Employment**

Employees should recognize that the Company must be their primary employment. Any outside employment, investment, or other source of income must be secondary and subordinate to their position with the Company, and must not interfere in any way with the performance of their duties as a Company employee. Any such relationships that could be construed as a conflict with these guidelines must be disclosed to the Company. The Company shall, in its sole discretion, determine whether any employment relationship is prejudicial to its interests and is contrary to these guidelines.

**9. Use of Company Personnel or Property**

Directors, officers, and employees shall not use or permit others to use the Company's employees or its property for personal purposes.

**10. Insider Trading**

No person affiliated with the Company may directly or indirectly affect securities transactions on the basis of "insider information" until that information has been fully disseminated to the public. Insider information is any information about a company or its business about which an employee may learn in connection with employment which is not generally known to the public and could affect a decision to buy, sell, or hold the stock of a company. For example, this Policy would preclude the purchase of stock in an unaffiliated company in which the Company is considering an investment or some other business arrangement. In addition, the disclosure of such inside

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information to persons outside the Company is strictly forbidden. Please refer to the Company's Insider Trading Policy for further details.

#### **11. Misappropriation of Business or Investment Opportunities**

Directors, officers, and employees are prohibited from taking direct or indirect advantage of any business opportunity which is received by reason of their relationship with the Company and in which the Company may be interested, unless such opportunity has been presented for consideration by the Company, has been rejected, and such activity is not prohibited under paragraphs 4 through 7 above.

#### **12. Illegal or Unethical Payments, Gifts, Bribes, or Gratuities; Accuracy of Company Records**

- a. The Company's policy is to comply strictly with the United States Foreign Corrupt Practices Act of 1977, the UK Bribery Act of 2010 and any amendments thereto. The Acts prohibit payments or offers of payments of anything of value to foreign officials, political parties, candidates for foreign political office, or to any other person in order to secure, retain, or direct business. Payments made indirectly through an intermediary, under circumstances indicating that such payments would be passed along for prohibited purposes, are also illegal.

The Acts also contain significant internal accounting control and record keeping requirements that apply to the Company's domestic operations. The intent, in requiring these records, is to ensure that a business enterprise maintains reasonable control over its assets and all transactions involving those assets. All employees are responsible for following Company procedures for carrying out and reporting business transactions.

- b. Employees must record and report information accurately and honestly. This includes accurate reporting of time worked, business expenses incurred, research test results, revenue, and costs, and other business related activities. All Company records are subject to audit, and financial records should be maintained in accordance with generally accepted accounting principles.

Dishonest reporting, either inside or outside the Company, will not be tolerated. This includes reporting or organizing information in an attempt to mislead or misinform. No entry shall be made on the Company's books and records that intentionally hides or disguises the true nature of any transaction.

A director, officer, or employee may not establish for any purpose an unauthorized, undisclosed, or unrecorded fund or asset involving the Company's money or other assets.

A director, officer, or employee may not allow transactions with a supplier, agent, customer, or other third party to be structured or recorded in a way that is not consistent with generally accepted business practices.

- c. The integrity, reliability and accuracy in all material respects of AMRI's books, records and financial statements is fundamental to AMRI's continued and future business success. No director, officer or employee may cause AMRI to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no director, officer or employee may create any false or artificial documentation or book entry for any transaction entered into by AMRI. Similarly, officers and employees who have responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets and transactions on AMRI's books and records.

## **2.0 OTHER LAWS AND REGULATIONS**

### **2.1 Fair Dealing**

Competing vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers is a part of the foundation for long-term success. However, unlawful and unethical conduct, which may lead to short-term gains, may damage a company's reputation and long-term business prospects. Accordingly, it is AMRI's policy that directors, officers and employees must endeavor to deal ethically and lawfully with AMRI's customers, suppliers, competitors and employees in all business dealings on AMRI's behalf. No director, officer or employee should take unfair advantage of another person in business dealings on AMRI's behalf through the abuse of privileged or confidential information or through improper manipulation, concealment or misrepresentation of material facts.

### **2.2 Restraint of Trade, Unfair Competition, and Discriminatory Practices Guidelines**

The Company is committed to free and open competition in the marketplace. Strict adherence by all employees to the letter and spirit of the antitrust laws of the United States and with the competition laws of any other country or group of countries which are applicable to its business is absolutely required. No employee should assume that the Company's interest ever requires any other course of conduct.

The antitrust laws are complex and difficult to interpret. They also have application to a very broad range of corporate activities. The list of prohibited activities set forth below is not intended to be exhaustive and is only a general guide to antitrust compliance. Employees should consult with the Vice President of Legal Affairs prior to taking action concerning a matter about which there is any question.

It is the Company's policy that no employee shall:

1. Agree or attempt to agree with a competitor of the Company (whether orally or in writing) with respect to any of the following: prices; terms of sale (including discounts, credit terms, or freight allowances); amount of production; or the boycotting of transactions with third parties. Further,

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no discussion or exchanges of information regarding such matters, including exchanges through trade associations, should take place with competitors or their representatives.

2. Provide promotional payments, services, or allowances to competing customers on other than proportionally equal terms, except where a statutory exception applies.
3. Make false or misleading remarks about other companies, their services or products, including the Company's competitors.

### **2.3 Environmental Protection and Employee Occupational Health and Safety Guidelines**

The Company is committed to protecting the environment and complying with all applicable public health and environmental laws and regulations.

To meet the Company's environmental standards, every facility is required to be in compliance with all public health and environmental laws pertaining to its operations. Every facility is expected to maintain an open dialogue with local communities on the nature and hazards, if any, of the materials that it manufactures or handles as required by applicable environmental laws or regulations. The Company's policy is to participate actively with government authorities, industry groups, and the public in promoting community awareness and emergency response programs to deal with any potential hazards associated with Company products, materials, or facilities.

The Company has a vital interest in providing each employee with a safe and healthy work environment. The prevention of occupational accidents and illnesses is a line management responsibility. Every manager and supervisor bears direct responsibility for the safety and health of every employee under his or her direction and for the safe utilization of all physical assets entrusted to his or her care.

The Company also expects and insists that every employee shall always show concern for his or her own safety and that of all fellow employees. This requires each employee to perform his or her duties in a safe manner and in compliance with all relevant safety policies and procedures.

### **2.4 Product Quality and Safety Guidelines**

The Company's policy is to conduct business with a high regard for the health and safety of those using its products and, in doing so, strengthen the bond between the Company and its customers. Each employee plays a critical role in ensuring the quality and safety of Company products, from initial design through manufacture, sale, and ongoing improvements. In addition, it is the Company's policy to cooperate with government agencies, industry associations, and recognized authorities involved with the quality and safety of the Company's products.

### **2.5 Protecting Confidential Business Information Guidelines**

The Company has developed confidential business and technical information over many years at considerable expense. Because of this effort, the Company now owns or otherwise possesses valuable confidential business and technical information. Employees must protect the Company's confidential

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business and technical information as carefully as they protect the Company's tangible property. Unauthorized disclosure of this information could destroy its value to the Company and give unfair advantage to others.

To ensure confidentiality of the Company's confidential information, employees must adhere to the following principles:

1. Employees must not disclose confidential information, either during or after employment, except when authorized by the Company to disclose it to suppliers, customers, or others who have entered into confidentiality agreements with the Company.
2. Similar restrictions, usually provided for in contracts, apply to information obtained from the Company's customers, partners, suppliers, and others who furnish information to the Company on a confidential basis. Employees must not disclose this confidential information, either during or after employment by the Company, except as provided in such contracts.

## **2.6 Government Contracts Guidelines**

While contracting with the U.S. Federal Government offers business opportunities and funding arrangements not normally available elsewhere, the rules and regulations of this unique customer must be observed. Failure to observe them can result not only in loss of contract work and revenue but in civil and/or criminal penalties as well. It is the contractor's responsibility to learn the applicable regulations in the area of government contracts; in government contracting, ignorance is no defense.

## **2.7 Political Contributions Guidelines**

The Company encourages the participation of all employees as private citizens in the electoral process. However, U.S. federal law and many state statutes generally prohibit a corporation from making direct or indirect political contributions of any kind. Included in this prohibition would be transportation or other services provided at a corporation's expense.

## **2.8 Competitive Information Guidelines**

It is good business practice for the Company to gather information about the markets in which the Company does business, including information about the Company's competitors and their products and services, through business surveys, market studies, competitive analysis, and benchmarking. However, to avoid the appearance of improper agreements and understandings with the Company's competitors, employees should avoid seeking and receiving such information directly from the Company's competitors. Employees may, however, gather information about the Company's competitors from other sources, such as published articles, advertisements, publicly distributed brochures, surveys by consultants, and conversations with customers.

Employees may accept competitive information only when there is a reasonable belief that both the receipt and use of the information is lawful. Employees must never attempt to acquire a competitor's

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trade secrets or other proprietary or confidential information through unlawful or unethical means, such as theft, spying, disclosures by the competitor's present or former employees, or breach of a competitor's non-disclosure agreement by a customer or other party. Further, employees should not misrepresent their identity in attempting to collect such information.

## **2.9 Alcohol and Substance Abuse Guidelines**

The Company prohibits employees from reporting to work or for Company business, or otherwise being on Company property, including on parking lots and while operating Company vehicles, under the influence of alcohol or drugs. The use, possession, sale, distribution, or purchase of drugs while at work or on Company business or while on Company premises, including on parking lots and while operating Company leased vehicles, are prohibited. Except for lawful consumption of alcohol as permitted at Company-sponsored functions and temporary possession of unopened alcoholic beverages in a vehicle on Company property, the use, possession, sale, distribution, or purchase of alcohol while on Company premises, including on parking lots and while operating Company vehicles, is prohibited. An employee convicted for the illegal use of drugs will be in violation of Company policy and subject to appropriate disciplinary action up to and including termination of employment.

## **2.10 Harassment Guidelines**

The Company strives to provide a productive work environment in which all of its employees can contribute at their highest levels. Accordingly, the Company prohibits harassment of any kind, whether the harasser or the victim is a supervisor, co-worker, supplier, customer, agent, or guest of the Company. Harassment on the basis of sex is a violation of law, this Code, and the Company's Harassment and Discrimination Policy.

Employees should refer to the Company's Harassment and Discrimination Policy for additional guidance and for information regarding the procedure that should be followed in the event an employee believes that he or she has been subjected to any form of harassment.

## **2.11 Equal Opportunity Guidelines**

The Company recognizes the personal value of every employee. The Company pledges that every employee will be treated with dignity and respect, and will be judged on the basis of his or her qualifications to perform jobs, without regard to race, color, gender, religion, national origin, age, marital status, physical/mental disability, veteran status, sexual orientation, or any other basis prohibited by law. Employees should report violations of Company policy in this area to their supervisor.

## **2.12 Quality of Public Disclosures**

AMRI is committed to providing its shareholders with complete and accurate information about its financial condition and results of operations as required by the securities laws of the United States and, if applicable, other foreign jurisdictions. It is AMRI's policy that the reports and documents it files

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with or submits to the Securities and Exchange Commission, and its earnings releases and similar public communications made by AMRI, include fair, timely and understandable disclosure. Officers and employees who are responsible for these filings and disclosures, including AMRI's principal executive, financial and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically and objectively in order to ensure that this disclosure policy is fulfilled. AMRI's Disclosure Committee is primarily responsible for monitoring AMRI's public disclosure.

### **3.0 CONFIRMATION OF COMPLIANCE AND REPORTING**

At the commencement of employment, each employee will be provided with a copy of the Code and be asked to confirm that he or she understands their responsibility for compliance with the specific guidelines, which are part of the Code and which is required during the term of their employment. Thereafter, employees may be asked to reconfirm the statements regarding the Code that they made at the commencement of employment.

At the commencement of employment, employees are also required to disclose to the Company any conflicts of interest they may have with the Company under the Conflict of Interest Guidelines described in the Code. In the event of conflicts which arise after the commencement of employment, employees are required to disclose such conflicts to the Company's Human Resources Department.

Every employee is expected to report any violation of the Code or any applicable law of which he or she becomes aware. When reporting suspected violations of the Code, AMRI prefers that officers and employees identify themselves in order to facilitate AMRI's ability to take appropriate steps to address the report, including conducting any appropriate investigation. However, AMRI also recognizes that some people may feel more comfortable reporting a suspected violation anonymously\*.

The best starting point for an officer or employee seeking advice on ethics-related issues or reporting potential violations of the Code will usually be his or her supervisor. However, if the conduct in question involves his or her supervisor, if the employee has reported the conduct in question to his or her supervisor and does not believe that he or she has dealt with it properly, or if the officer or employee does not feel that he or she can discuss the matter with his or her supervisor, the employee may raise the matter through the following communication channels:

- In writing (which may be done anonymously), addressed to the Vice President of Human Resources or the Corporate Compliance Manager by U.S. mail to AMRI P.O Box 15098, Albany, NY 12212-5098

- By e-mail to the Vice President of Human Resources at: [brian.russell@amriglobal.com](mailto:brian.russell@amriglobal.com) or the Corporate Compliance Manager at: [michael.saltsman@amriglobal.com](mailto:michael.saltsman@amriglobal.com) (anonymity cannot be maintained) ; or
- The notifying party may place an anonymous or non-anonymous phone call or web submission to a designated phone number or website referred to as the “Employee Reporting Hotline”. The Employee Reporting Line may be reached at:
  - US: 1(888)475-0480
  - India: 888-475-0479
  - Singapore: 800-110-1790
  - UK\*: 0808-234-0278
  - Website: <https://amri.alertline.com/gcs/welcome>

\* Entities in the European Union (“EU”) – Due to EU data protection laws, only violations pertaining to accounting, internal controls or auditing matters, may be made anonymously. To comply with local regulations, employees must provide their identity when reporting all other potential violations.

Any concerns or questions regarding potential violations of the Code, any other Company policy or procedure or applicable law, rules or regulations involving accounting, internal accounting controls or auditing matters should be directed to the Vice President of Human Resources or the Corporate Compliance Manager.

- If employees do not feel comfortable submitting a complaint in accordance with these procedures, or if they feel that a previously submitted complaint was not adequately addressed, they may contact the Chairman of the Audit Committee directly by mail or telephone to:  
Arthur Roth, 10 West Cobble Hill Road, Loudonville, NY 12211, (518) 465-2333.

Employees must not use these reporting channels in bad faith or in a false or frivolous manner. Further, employees should not use the Reporting Line to report grievances that do not involve the Code or other ethics-related issues.

If an officer or employee wishes to remain anonymous, he or she may do so, and AMRI will use reasonable efforts to protect the confidentiality of the reporting person subject to applicable law, rule or regulation or to any applicable legal proceedings. In the event the report is made anonymously, however, AMRI may not have sufficient information to look into or otherwise investigate or evaluate the allegations. Accordingly, persons who make reports anonymously should provide as much detail as is reasonably necessary to permit AMRI to evaluate the matter(s) set forth in the anonymous report and, if appropriate, commence and conduct an appropriate investigation.

Except as otherwise specifically set forth herein, employees who know of or reasonably suspect violations of the Code must report them to one of the following individuals: his or her supervisor, a group or division officer within the group or division in which the employee works, the Vice President of Human Resources, or the Corporate Compliance Manager.

### **3.1 No Retaliation**

AMRI expressly forbids any retaliation against any officer or employee who, acting in good faith, reports suspected misconduct. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

### **3.2 Waivers and Amendments**

No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes without limitation, for purposes of this Code, AMRI's principal executive, financial and accounting officers) shall be effective unless (i) approved by the Board of Directors or, if permitted, a committee thereof, and (ii) if applicable, such waiver is promptly disclosed to AMRI's shareholders in accordance with applicable United States securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Any waivers of the Code for other employees may be made by the Compliance Officer, the Board of Directors or, if permitted, a committee thereof.

All amendments to the Code must be approved by the Board of Directors or a committee thereof and, if applicable, must be promptly disclosed to AMRI's shareholders in accordance with applicable United States securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

## **4.0 DISCIPLINE**

The Code is very important to the Company. Failure to comply with the standards outlined herein and all policies referred to herein will result in disciplinary action, ranging from a reprimand to dismissal. Disciplinary action will be taken against:

1. Any employee who violates the Code or pertinent law.
2. Any employee who deliberately withholds relevant information concerning a violation of the Code or pertinent law.

3. The violator's manager or supervisor to the extent that the circumstances of the violation reflects participation in the violation, or lack of diligence.
4. Any supervisor or employee who retaliates, directly or indirectly, or encourages others to do so, against an employee who reports a Code, policy, or law violation.
5. Any employee who knowingly falsely accuses another employee of a Code, policy, or law violation.