

A letter from the CEO

Dear Colleague:

Working for a company as large and integral to healthcare as Cardinal Health gives each of us the opportunity to make a significant difference in the way healthcare is delivered to millions of patients every day. By doing our jobs well, we help our care-giving customers do their jobs well. That's an incredible opportunity, but it comes with a high expectation of service and quality.

We must work every day with the knowledge that doctors, nurses, pharmacists, clinicians and other healthcare workers are counting on us to help them deliver the best care, in the best way, at the best price. Our integrity and reliability as a partner is the price of entry for any successful customer relationship because, quite literally, patient lives often depend on our doing what we say we'll do — with speed, accuracy, quality and integrity.

That's why we take ethics and compliance so seriously. It's an obligation we share as employees and a responsibility each of us bears on behalf of our colleagues, our customers and our shareholders. This *Standards of Business Conduct* is the basic reference tool we make available to every employee, consultant, supplier and vendor, with the expectation that you will make an important investment of your time and attention to read it and to think about how it applies to the work you do and to the relationships you maintain on behalf of Cardinal Health.

You'll find in this document some great reference materials and clear definitions to help guide your decisions. However, even the best document won't be able to predict every situation or address every concern you might encounter. So, if in doubt, please ask before you act. You can talk to your manager, you can call the Business Conduct Line, the Ethics and Compliance department or any of the resources listed at the back of the booklet. If you're not sure, the key is to ask.

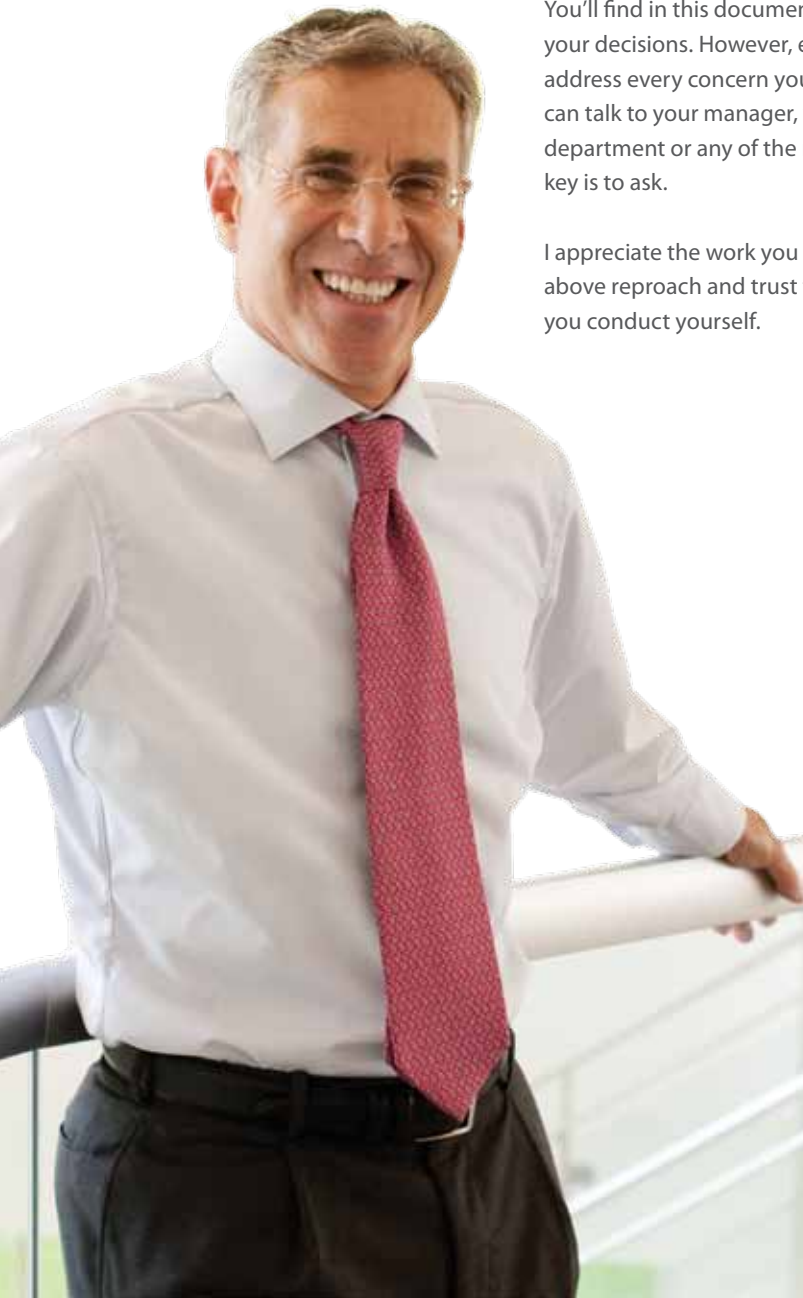
I appreciate the work you do every day to make our relationships with customers and suppliers above reproach and trust that you will continue to be mindful of our company standards in how you conduct yourself.

Sincerely,



George Barrett

Chairman and Chief Executive Officer



Our Values

We are **tenacious** in fulfilling our commitments to customers.

We are **accountable** for high performance and to each other.

We are **inventive** and **adaptable**.

We bring a sense of **optimism, enthusiasm** and a **competitive spirit** to our work.

We are **inclusive** and **work together** with confidence and trust.

We are **genuine, open, direct** and **respectful**.

We can be **trusted** to do the right thing.

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Our *Standards of Business Conduct* Overview

We are pleased to provide the *Standards of Business Conduct*, which describes the values and standards we live by at Cardinal Health. It also includes references to specific policies and procedures — all available on-line or on request from the Ethics and Compliance department — that provide a detailed view of company expectations for certain circumstances or situations you may encounter. Maintaining our *Standards of Business Conduct* is a responsibility we share as employees of Cardinal Health.

The *Standards of Business Conduct* outlines what is expected of every employee, officer and director of Cardinal Health. It is essential that we commit to complying not only with the letter but also the spirit of these standards. Although the *Standards of Business Conduct* covers some examples of ethical and business issues and scenarios, a single document cannot provide all the answers. Additional guidance is provided in the form of policies and procedures. Please be aware that just as industry standards and legal and regulatory requirements evolve, our standards, policies and procedures are amended from time to time. For the most current information, you should visit our internal website, myCardinalHealth. The information you see posted is the most up to date and is considered immediately effective upon posting. We encourage all employees to visit the intranet periodically to keep current.

If you have any uncertainty or questions regarding the application of these standards, you should contact your manager, the Ethics and Compliance department or the Business Conduct Line. Anyone who fails to adhere to the *Standards of Business Conduct*, our policies and applicable laws is acting outside the scope of his or her employment or engagement with the company and may be subject to discipline, up to and including dismissal. That person may also face civil fines and criminal penalties.

When conducting business for Cardinal Health, consultants, contractors and other business partners are required to observe the same level of integrity, responsible business conduct and compliance with the law as Cardinal Health employees. Employees should provide such third parties with a copy of the *Standards of Business Conduct*.

Any waiver of a provision contained in this document requires the written approval of the Chief Legal and Compliance Officer. In addition, any waiver requested for an executive officer or director requires the approval of the Audit Committee of the Board of Directors and prompt disclosure to shareholders.

The *Standards of Business Conduct* is available in multiple languages and is accessible via myCardinalHealth and the external website as a publicly accessible document. Companywide policies and procedures described in this booklet are posted on the intranet.

If you have any questions or concerns, please talk with your manager, or call the Ethics and Compliance department or the Business Conduct Line at 800.926.0834 in the United States, Puerto Rico or Canada. For international telephone numbers, consult the list at the back of this booklet. In addition, you may contact any of the other resources listed at the back of the booklet.

Our Culture

At Cardinal Health, we are committed to a culture where each employee makes wise decisions that consistently reinforce that our customers, suppliers, investors and fellow employees can trust us to do the right thing. Trust is the degree of confidence stakeholders have in the people who make the day-to-day decisions in a company; it determines reputation and drives results.

A key to a culture of trust is to make sure that each employee knows, understands and follows a core set of shared values and conducts himself or herself consistent with standards based on those values. The *Standards of Business Conduct* is our common set of standards. What we do defines who we are and our *Standards of Business Conduct* defines how we can be expected to behave at Cardinal Health.

When making work-related decisions, employees should ask themselves:

Can I take a particular action?

Should I take that action?

The “can I” question asks whether it’s permissible to take a particular action based on an analysis of the law, applicable regulations, our *Standards of Business Conduct* and Cardinal Health policy. The “should I” question goes a step further, asking whether the action is advisable. It questions how the action will be viewed down the road through the lens of hindsight and seeks to determine the future impact of that decision on Cardinal Health’s reputation with key stakeholders, government regulators and the public. Our *Standards of Business Conduct*, our internal policies and the law frame the “can we” question; our values frame the “should we” question. In short, our *Standards of Business Conduct* and values work together so our employees know what is expected of them as we seek to serve our customers and enhance our reputation as a company of people who can be trusted to do the right thing.

Our culture is defined by our Values and Standards of Business Conduct which capture how we interact with each other, our customers and our suppliers.

It’s how we think, act and speak – it’s who we are.

Standards of Business Conduct

1. Act with integrity and in compliance with the law

We work together, according to shared standards and values, to make wise decisions that foster a culture of trust and responsible business conduct.

2. Ask questions, seek guidance and raise concerns

We ask questions, seek guidance and raise concerns in order to work together with confidence and trust.

3. Treat one another fairly and foster a safe, productive, diverse and environmentally responsible workplace

We treat one another with dignity and respect and are accountable to one another to maintain a safe, productive, diverse and environmentally responsible workplace.

4. Avoid conflicts of interest

We avoid activities or personal interests that create or appear to create a conflict of interest with respect to our responsibilities as Cardinal Health employees.

5. Compete responsibly in the marketplace

We compete for business diligently, openly and honestly and are tenacious in fulfilling our commitments to customers.

6. Protect the integrity of the global supply chain

We support initiatives and policies to help provide a secure worldwide supply chain.

7. Interact appropriately with government entities, officials and employees

We comply with the laws and regulations that govern the political process and interactions with government entities, officials and employees.

8. Maintain accurate books and records

We record information accurately so that employees, customers, suppliers, investors and other stakeholders can trust the information and make informed decisions.

9. Protect information and assets

We properly use and take reasonable precautions to safeguard Cardinal Health information and physical assets.

10. Encourage individual volunteerism and corporate social responsibility

We encourage involvement in the communities where we live and work which may include individual voluntary participation in community service and corporate social responsibility.



1

Act with integrity and in compliance with the law

We work together, according to shared standards and values, to make wise decisions that foster a culture of trust and responsible business conduct.

Why it matters

Our reputation as a leading healthcare company depends on each of us making appropriate decisions every day. By following the *Standards of Business Conduct* and applicable laws, policies and procedures, we make Cardinal Health a desirable place to work, a trusted advisor to our customers and an organization in which investors can place their confidence and trust.

What we expect of our employees

We expect employees to act with integrity and trust them to do the right thing. The *Standards of Business Conduct* provides overall guidance, but is not a substitute for reading, understanding and following the policies and procedures that apply to your job. Your manager is your best resource for job-specific information.

Do the right thing

- Understand and comply with the *Standards of Business Conduct* and any applicable laws and regulations, as well as department or company policies and procedures
- Check myCardinalHealth for the most up-to-date policies and procedures
- Participate in training opportunities
- Ask the difficult questions and challenge each other in a professional and respectful manner to address issues
- Ask your manager or the Ethics and Compliance department for clarification or direction especially if there appear to be conflicting obligations

What we expect of our leaders

As with all of our employees, we expect our leaders to understand that business results and acting with integrity are both essential and to provide visible leadership demonstrating that we cannot have one without the other. To sustain a culture where trust and responsible business conduct are expected, our leaders must be a trusted resource for employees.

Do the right thing

- Lead by example; reinforce with employees that business results are not more important than acting with integrity
- Make employees available for and reinforce the importance of attending training
- Consider compliance efforts and results when evaluating and rewarding employees
- Make sure employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation
- Deal immediately with business conduct issues and take appropriate disciplinary action with the help of the Ethics and Compliance, Legal or Human Resources departments
- Identify compliance risks and take prompt action to address them

Question and answer

Q: *I just read an article about some new regulations that will be effective in a few months. We will need to change some of our processes to comply with the new requirements. Our budget is already under pressure and the new requirements will add more time to our process, negatively affecting our productivity. What should I do?*

A: Complying with our legal and ethical obligations is essential to our business goals. Sustainable long-term performance requires that business results are achieved in a manner that complies with applicable laws, policies and procedures. Bring the matter to your manager's attention.

Q: *Do I have to follow Cardinal Health's Standards of Business Conduct in those instances where other companies do not comply with similar standards?*

A: Yes, you must always follow our values and *Standards of Business Conduct*. Our *Standards of Business Conduct* reflects our Values and the standards by which we have decided to operate our business. These values and standards do not change simply because other companies do not share our same values or standards.

Learn more by reading these policies:

- Reporting obligations
- Restrictions on buying and selling stock and securities (insider trading)
- Training and e-learning



2

Ask questions, seek guidance and raise concerns

We ask questions, seek guidance and raise concerns in order to work together with confidence and trust.

Why it matters

Our reputation, our relationships and our future all depend on our commitment to integrity and compliance. When you do not know which decision is the best, or if you suspect someone else is not acting appropriately, the best thing you can do is to reach out and check with the resources available to you. It is better to ask the question than regret the action.

Do the right thing

- Don't assume the way things have always been is appropriate
- Ask questions, seek guidance and raise concerns
- Talk to your manager
- Call or email your concerns to the Ethics and Compliance department or Business Conduct Line

Ethics and Compliance department

The Ethics and Compliance department, under the leadership of the Chief Legal and Compliance Officer, is responsible for the *Standards of Business Conduct*, the Business Conduct Line and partnering with business leaders to identify, assess and address compliance risks.

- Telephone: 614.757.7504
- Email: Ethics and Compliance
(GMB-DUB-Ethics&Compliance@cardinalhealth.com)
- Mail: 7000 Cardinal Place, Dublin, OH 43017, USA
- Fax: 614.757.6948

Business Conduct Line

You may access the Business Conduct Line by telephone using the numbers listed in the back of this booklet or over the Internet at www.businessconductline.com

- Open 24/7 and operated by an independent, third-party company
- Multilingual agents available. There may be a brief pause while the appropriate operator is placed on the line
- Callers have the option to remain anonymous
- Main telephone number: 800.926.0834
- See list at the back for country-specific local phone numbers

No retaliation

Cardinal Health will not discharge, demote, suspend, threaten, harass or, in any manner, retaliate against an employee based on that employee truthfully raising a concern about any actual or suspected misconduct or other risks to the business. If you believe you have been retaliated against for raising a concern, immediately contact the Ethics and Compliance department or the Business Conduct Line.

A word about investigations

Cardinal Health handles inquiries and investigations confidentially. The substance of your inquiry and your identity (if you choose to provide your name) is disclosed on a strict need-to-know basis, to the extent deemed necessary by Cardinal Health to conduct a proper investigation and to respond appropriately. When you ask a question, seek guidance or raise a concern, you will receive a response if you have provided the company with a means to do so. If a concern is substantiated, the situation will be resolved through appropriate corrective actions which may include, among other things, clarification of a company policy, additional training, facility or process change and/or disciplinary action.

Do the right thing

- Cooperate during investigations and audits during your employment with Cardinal Health and after your employment ends
- Tell the truth
- Do not discuss an investigation or audit with other employees
- Consult with the Legal department prior to altering or destroying any records related to an investigation or audit

Accounting, auditing, internal controls or financial reporting

In addition to the Business Conduct Line, you may submit written concerns regarding accounting, internal controls, financial reporting, auditing or other ethical matters to the chairperson of the Cardinal Health Audit Committee of the Board of Directors, c/o Chief Legal and Compliance Officer, 7000 Cardinal Place, Dublin, OH, 43017 USA.

Question and answer

Q: *I've been thinking about calling the Business Conduct Line, but I'm not sure if I should. My manager told me to do something that I feel is dangerous and may violate a safety regulation. I think I should tell someone who can look into this, but I'm afraid that my manager will make my job difficult for me if I do. What should I do?*

A: Even in great companies, people sometimes do things they shouldn't. You have identified what you believe is a potentially serious matter. If something does not seem right, you should speak up. Your manager is often the best place to raise concerns, but because it is your manager's request that concerns you, calling the Business Conduct Line is a good option. You have the option to remain anonymous.

When you call the Business Conduct Line, we will look into the situation and will not tolerate your manager or anyone else retaliating against you. If you believe you have been retaliated against for raising a concern, you should immediately contact the Ethics and Compliance department or the Business Conduct Line. The right thing to do is to report your concerns.

Learn more by reading these policies:

- Reporting obligations
- Use of investigative firms



3

Treat one another fairly and foster a safe, productive, diverse and environmentally responsible workplace

We treat one another with dignity and respect and are accountable to one another to maintain a safe, productive, diverse and environmentally responsible workplace.

Why it matters

To create and maintain a safe and productive work environment, it's up to all of us to respect the unique character of every colleague, to appreciate the diversity of thought, experiences and backgrounds that they bring to the table and to treat each other with courtesy, respect and professionalism. It's equally important to comply with environmental, health and safety requirements and operate with all required permits, approvals and controls.

Environment, health and safety

We demonstrate our commitment to the health and safety of our employees, contractors and the community by complying with environmental, health and safety laws and operating with required permits, approvals and controls.

Do the right thing

- Observe environmental, health and safety laws, regulations and policies
- Report accidents, injuries or unsafe practices or conditions
- Take appropriate and timely action to correct known unsafe conditions

Fair treatment and diversity

We provide equal opportunity to employees and applicants during the employment process. We are committed to building a diverse, inclusive workplace that is representative of the communities in which we operate and that is free from discrimination. In addition, we are dedicated to fostering a work environment where employees are respected and enjoy coming to work.

Do the right thing

- Be open, honest and professional in your dealings with your manager, your colleagues and your customers
- Embrace the differences and unique qualities of your co-workers and those with whom Cardinal Health does business
- Treat others with respect and value their differences
- Do not discriminate on the basis of any group status or characteristic protected by law or Cardinal Health policy (e.g., person's age, disability, gender, etc.)

Harassment and bullying

We will not tolerate harassment, intimidation or bullying of employees by co-workers, managers or any other individuals with whom employees come into contact while conducting business.

Do the right thing

- Maintain a safe working environment that is free from bullying, intimidation and harassment
- Do not act in a disrespectful, hostile, intimidating, threatening, or harassing manner

Substance abuse

The health and safety of our employees demands that each employee report to work free from the influence of any substance that could prevent him or her from conducting work activities safely and effectively. Substance abuse and the misuse of alcohol and drugs pose unacceptable risks for safe, secure and efficient operations and will not be tolerated.

Do the right thing

- Never use illicit or illegal drugs
- Do not report to work while under the influence of any substance that could prevent you from conducting work activities safely and effectively (e.g., alcohol, medication that can make you drowsy while operating heavy machinery, etc.)

Workplace violence prevention

We do not tolerate workplace violence and will investigate and take appropriate action against unacceptable behavior such as physical assaults, fights, threats, intimidation, and the intentional or reckless destruction of company or employee property or the property of companies with whom we do business. We reserve the right to inspect work areas and the personal possessions of employees and visitors.

Do the right thing

- Maintain a safe working environment that is free from threatened or actual physical harm
- Do not bring or use weapons while on company business or on company property in violation of company policy or federal, state or local law
- Cooperate with inspections

Question and answer

Q: *A co-worker has repeatedly refused to provide me with information that is essential for my job, has called me derogatory names and has told other employees that I am not qualified to do my job. How should I handle the situation?*

A: Harassment and intimidation can occur in many forms. In this situation, it appears that the employee is persistently bullying by making demeaning comments that are intended to erode your self-confidence or self-esteem. If you feel comfortable doing so, ask the employee to stop. If you do not feel comfortable doing this or if the harassment or bullying continues, talk to your manager. If the issue is not adequately addressed by your manager, you may also contact your Human Resources representative or call the Business Conduct Line. Bullying undermines the respect and trust that is central to the way that we conduct business and is not permitted.

Q: *My manager keeps asking me out on a date and putting his arm around my shoulder when he talks to me even after I have told him I am not interested and to please stop. My performance review is next month and he told me that I have a better chance for a promotion if I go out with him. How should I handle this situation?*

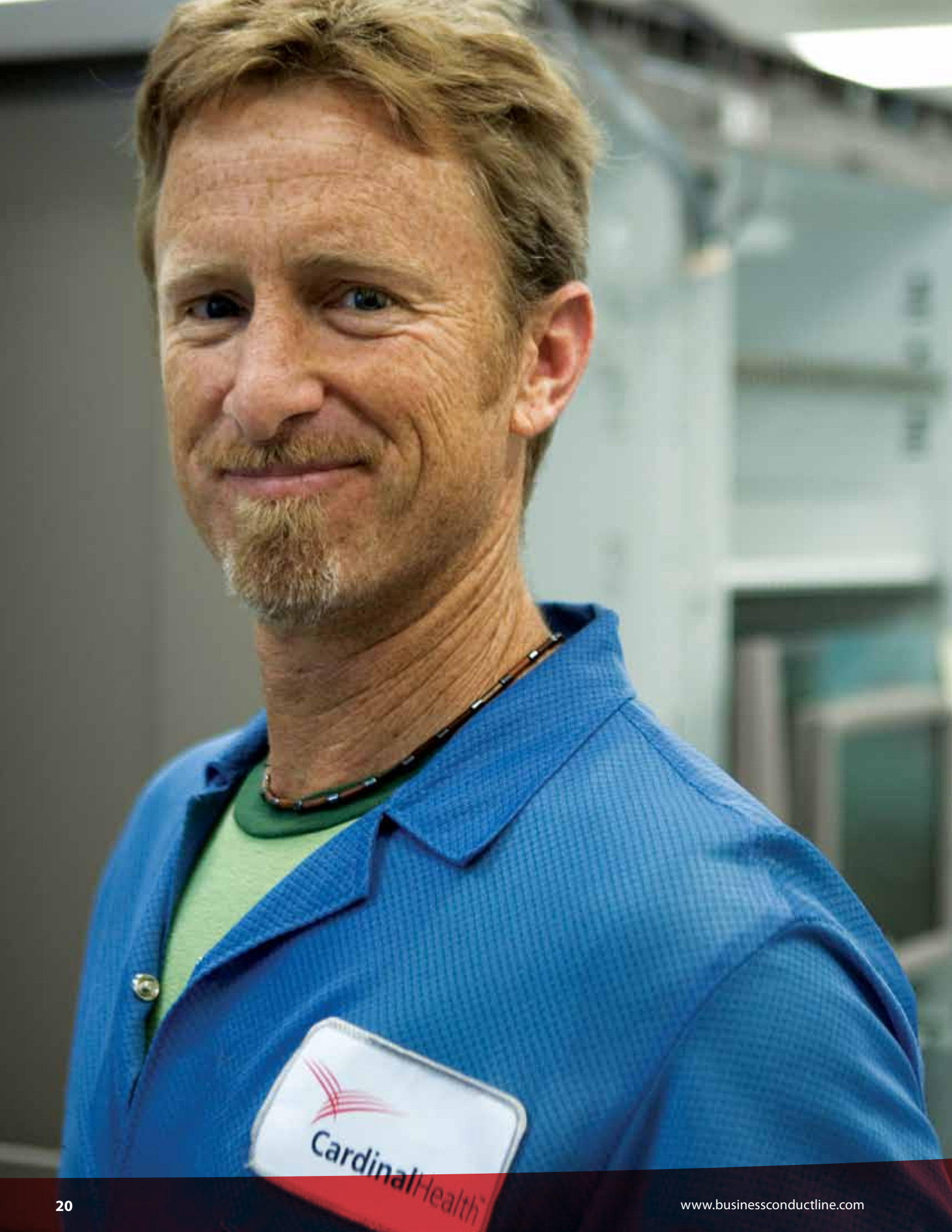
A: Sexual harassment is not tolerated by the company. It includes unwelcome sexual advances, requests for sexual favors and other unwelcome verbal or physical conduct of a sexual nature. Immediately contact your Human Resources representative or call the Business Conduct Line.

Q: *I'm new to Cardinal Health and don't understand some of the safety rules. I feel awkward asking questions. What should I do?*

A: We encourage employees to ask questions, especially when safety is involved. Talk to your manager. Your manager has the responsibility to provide you the training you need to do your job. If you don't feel comfortable talking with your manager, talk with the Environment, Health and Safety department or call the Business Conduct Line.

Learn more by reading these policies:

- Environmental, Health and Safety
- Equal employment opportunity/nondiscrimination
- Harassment and bullying prevention
- Weapons restriction
- Workplace violence prevention



4

Avoid conflicts of interest

We avoid activities or personal interests that create or appear to create a conflict of interest with respect to our responsibilities as Cardinal Health employees.

Why it matters

We make decisions based on sound business judgment and unclouded by any personal interest, relationship pressure or potential for personal gain. The best way to avoid a potential conflict of interest is to ask questions and address any situation that has the potential to be misinterpreted by others.

Conflicts of Interest

A conflict of interest arises when your outside personal, financial, political or social interests or activities have the potential of making it difficult to perform your work in the best interest of Cardinal Health. You must avoid situations that conflict, or could have the appearance of conflicting, with the best interests of Cardinal Health. Conflicts of interest can occur in a variety of ways; however, the following situations can often produce conflicts of interest and should be carefully analyzed:

- Doing business with family or close friends
- Making charitable contributions on behalf of the company to a charitable organization affiliated with or recommended by a current or prospective customer or supplier
- Hiring consultants, agents and other third parties with whom you have a personal relationship
- Investing in real estate, patent rights or businesses of interest to Cardinal Health
- Pursuing outside employment with a customer, vendor or supplier
- Accepting entertainment from people or entities with whom we do business

Do the right thing

- Make decisions in the best interests of Cardinal Health
- Resolve conflicts of interest in an open, transparent manner
- Avoid competing in any way with Cardinal Health
- Do not take for yourself opportunities that were discovered through the use of company property, information or your position or use company property, information or your position for personal gain
- Ask your manager or the Ethics and Compliance department questions about any situation that could be perceived as a potential conflict of interest

Restrictions on buying and selling stock and securities (insider trading)

Do not buy or sell stocks or other securities of a company while aware of material nonpublic information about that company. Likewise, you may not communicate material nonpublic information, other than on a need-to-know basis, to anyone else (for example, to relatives, friends, or co-workers) until that information has been released publicly. Information is material if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision to buy, hold or sell a security. Information is nonpublic if it has not been publicly released by the company or is not otherwise publicly available. These obligations continue after your employment with Cardinal Health ends.

Do the right thing

- Do not buy or sell stock or other securities of a company while aware of material, non-public information about that company
- Contact the Legal department if you have any questions about trading in stocks and securities

Question and answer

Q: *I am a full-time employee of Cardinal Health. I've been asked to consult with another healthcare company using the skills I use in my job with Cardinal Health. Is that a conflict of interest?*

A: You can work a second job without a conflict of interest so long as the second job does not interfere with your responsibilities at Cardinal Health (e.g., you are able to continue to dedicate necessary time and attention to your Cardinal Health job, you are not competing with Cardinal Health, you do not use the assets or confidential information of Cardinal Health, etc.). Since you are a full-time employee and would be using the same skills you use in your job with Cardinal Health, there is a potential for a conflict of interest. The best way to avoid a conflict is to talk with your manager before accepting any outside employment or consulting arrangement.

Q: *I know that the company is acquiring a large public company. This deal will be material to both companies but has not yet been announced publicly. Can I buy shares of the company we are acquiring so long as I do not buy shares of Cardinal Health?*

A: No. You have material, non-public information. You may not buy or sell the shares of either Cardinal Health or the company we are acquiring until the second business day after the transaction has been publicly announced. Until the information is public, you must not share this material information with anyone who does not have a business need to know (for example, other employees, relatives or friends). Consult the policy on Restrictions on buying and selling stock and securities (insider trading) or contact the Legal department for additional information.

Learn more by reading these policies:

- Charitable contributions
- Conflicts of interest
- Interactions with customers
- Interactions with vendors and other third parties
- Restrictions on buying and selling stock and securities (Insider trading)



5

Compete with integrity in the marketplace

We compete for business diligently, openly and honestly and are tenacious in fulfilling our commitments to customers.

Why it matters

Competing responsibly in the marketplace builds our long-term relationships and enhances our reputation. It is essential that our customers and suppliers know they can trust Cardinal Health.

Competitive intelligence

Properly acquiring and using information about other companies, including our customers, suppliers and competitors, is a routine part of operating in the marketplace.

Do the right thing

- Respect a person's obligation to protect the confidential information of their current and former employers
- Question how any information about a competitor was obtained and whether the information is confidential, especially if circumstances are suspicious (e.g., you suspect it has been supplied in violation of a legal or contractual commitment)
- Do not acquire competitive intelligence through improper or illegal means

Interactions with consultants, contractors and other business partners

We conduct business only with those consultants, contractors and other third party business partners that are reputable and qualified in the services to be performed (e.g., do not appear on any government debarment or excluded parties list). We do not do anything indirectly through third parties that would otherwise be prohibited if we did it directly. When conducting business for Cardinal Health, consultants, contractors and other business partners are required to observe the same level of responsible conduct and compliance with the law as Cardinal Health employees.

Do the right thing

- Follow established procedures before you enter into any agreement with a consultant, contractor or any other third party business partner
- Provide consultants, contractors and any other third party business partner with a copy of the *Standards of Business Conduct* and explain our expectations
- Complete appropriate due diligence regarding the background and qualifications of consultants, contractors or any other third party business partners

Interactions with competitors (fair competition and antitrust)

Generally speaking, antitrust and competition laws constrain or prohibit discussions or agreements among competitors that restrain trade. This can include discussions about past, present or future prices, bids, terms or conditions of sale and territorial markets. In addition, any understanding or agreement between a distributor and its supplier regarding the prices the distributor may charge for products or limits on a distributor's geographic territory can cause antitrust concerns.

Do the right thing

- Exercise caution when talking with a competitor
- Be alert to improper discussions when attending trade association functions or industry meetings
- Refrain from discussing or entering into any agreement that is intended to restrain trade
- Seek guidance from the Legal department whenever you have any questions or are unsure about a situation involving a competitor

Interactions with customers

Our interactions with customers should focus on developing mutually beneficial business relationships so our customers can focus on their patients. Employees may not offer or provide anything of value (e.g., donations, grants, scholarships, subsidies, support, consulting contracts, gifts, etc.) to a customer in exchange for purchasing, recommending or arranging for the purchase of products or for a commitment to continue to purchase products or services. If properly structured, discounts and rebates provided to a healthcare provider on purchases of products or services are generally permitted.

Do the right thing

- Read and understand the policies and procedures that apply to interactions with customers
- Refrain from improperly offering anything of value to win business or to influence a business decision
- Consult with the Legal department prior to entering into contracts with customers which provide for discounts and rebates
- Seek guidance from the Ethics and Compliance department whenever you have a question about interactions with customers

Marketing practices

Cardinal Health believes in competing for business diligently, openly and honestly. Unless there is sufficient research to substantiate a comparison between a Cardinal Health product and a competing product, you may not use comparative advertising of any sort, whether by written advertisement, demonstration, comments or innuendo.

Do the right thing

- Promise only what you can deliver and deliver on what you promise
- Respond to customer feedback or complaints in a courteous, efficient and timely manner
- Describe Cardinal Health products, services and prices and those of our competitors accurately
- Comply with Cardinal Health marketing standards and have marketing activities appropriately reviewed before launch

Purchasing practices

Cardinal Health bases purchasing decisions on achieving optimal value for the company and alignment to our business standards and goals. We treat fairly and do not discriminate against suppliers; however, it is appropriate to differentiate among suppliers based upon appropriate business considerations. Cardinal Health expects suppliers to comply with applicable laws and to conduct business with integrity.

Do the right thing

- Read and understand the policies and procedures that apply to interactions with suppliers
- Do not provide a commission that is disproportionate to the services provided
- Do not request or accept any kind of personal payment or benefit or other improper advantage

Question and answer

Q: *One of my customers has promised to increase his business with Cardinal Health if I hire him as a consultant. He is a good customer and he might be able to help us with a new product launch. What should I do?*

A: You may not try to disguise an improper payment as a proper payment. This customer is asking you to be dishonest and provide him with cash through a consulting agreement in exchange for his business with you. Consulting payments, royalty payments, charitable donations, commissions and any other payments to a customer may only be made for proper purposes.

Q: *What do I do if I'm in a trade association meeting with competitors and an improper discussion about anti-competitive matters takes place in a group setting?*

A: You must immediately object to the subject and end the discussion. This may require you to leave the room if the improper discussion continues after you object. Even after stating an objection, failure to withdraw from the group could be used to support an argument that an agreement existed if the improper discussion is continued. If a record of the meeting is maintained, you should ask that your objection (and if necessary, departure) be noted for the record and request a copy of the record. Any improper discussions should be promptly reported to the Ethics and Compliance or Legal departments regardless of the steps you took to object and document the objection.

Learn more by reading these policies:

- Fair competition and antitrust
- Interactions with customers
- Interactions with vendors and other third parties



6

Protect the integrity of the global supply chain

We support initiatives and policies to help provide a secure worldwide supply chain.

Why it matters

We provide products and services that have the potential to save, or if misused, to harm lives. It's essential that at every step of the process our employees handle these products appropriately so that hospitals, pharmacists, doctors and patients can rely on us to provide quality healthcare products.

Quality

We have quality systems in place so we manufacture, handle, store and distribute products in accordance with applicable legal and regulatory requirements. Every employee is responsible for following our quality processes when working with the products we sell.

Do the right thing

- Do not compromise quality for deadlines
- Understand and comply with the policies that cover the manufacture, storage, handling and distribution of products we sell
- Respond promptly to quality issues you observe or that are raised by customers or vendors by talking to your manager or the Quality and Regulatory Affairs department

Anti-diversion compliance

Cardinal Health is committed to maintaining the integrity of the supply chain by developing and maintaining processes to help guard against diversion. We maintain "know your customer" policies and procedures to validate that products we ship are sold in accordance with legal and contract requirements and are received by customers for their legitimate use.

Do the right thing

- Know our customers in order to determine whether they and their purchases meet our standards
- Purchase from suppliers that meet our quality, delivery, service and pricing standards and that are responsible corporate citizens
- Be alert for any warning signs of supply chain integrity issues with a particular supplier or customer
- Promptly raise concerns about supply chain integrity, including potential diversion to your manager or the Quality and Regulatory Affairs department

Trade regulations

We must comply with applicable U.S. and local import and export control laws as products move across country boundaries. Export control laws and contractual agreements with our suppliers place restrictions on how we can move products across country boundaries and may prohibit us from doing business with certain countries, companies or individuals. As a company based in the United States, all employees, agents and subsidiaries must comply with U.S. and local trade laws.

Do the right thing

- Raise questions or concerns about trade regulations to your manager or the Global Trade department
- Maintain appropriate import, export and customs records and controls
- Understand the requirements that apply to shipments from one country to another country
- Report to the Global Trade department if you receive any communication or documentation that requests Cardinal Health not to do business with another party or country (i.e., boycotts)
- Contact the Global Trade department to confirm the legal trade status of any country before doing business with or in that country

Money laundering and terrorist financing

Employees, especially those employees who handle cash, must actively guard against the use of our products and services for purposes of money laundering, financing of terrorism or other criminal activity. Money laundering is the process by which individuals or organizations try to make the source of funds look legitimate by concealing the true origin of the funds. Terrorist financing tries to conceal the destination and use of funds that may have either legitimate or criminal origin.

Do the right thing

- Watch out for irregularities in the way payments are made, including:
 - Payments made by someone who is not a party to the contract or in currencies other than the currency specified in the documents
 - Requests to make payments in cash or cash equivalents (e.g., traveler's checks, money orders) or in an amount greater than is owed
 - Report any suspicious transactions to your manager or the Legal department
-

Question and answer

Q: *While receiving product at a distribution center, I noticed that some refrigerated product was on the dock and no one seemed to be working with the product. Should I raise a concern to the dock supervisor?*

A: Yes. Refrigerated product must be promptly moved from the dock to refrigerated storage locations. You should immediately bring this, or any other questions or concerns, to the attention of the dock supervisor or your manager.

Q: *While helping a new customer set-up their pharmacy, I noticed seven customers arriving at the same time to obtain prescriptions. I overheard the customers talking to the pharmacist and each other about how long a drive they have ahead of them to get home — several hours and many states away. I also noticed that the customers appeared to be receiving powerful pain medications. It seemed suspicious to me. What should I do?*

A: These are warning signs that indicate diversion of controlled substances. Report what you saw to the Cardinal Health Quality and Regulatory Affairs department, your manager or the Business Conduct Line.

Learn more by reading these policies:

- Anti-diversion policies and procedures
- Contract pricing – customer eligibility
- Global Trade policies





Interact appropriately with government entities, officials and employees

We comply with the laws and regulations that govern the political process and interactions with government entities, officials and employees.

Why it matters

Working with government entities, officials and employees (including locally-, state- and federally-owned hospitals) and complying with the numerous complex regulations governing the healthcare industry are routine business operations for many of us at Cardinal Health. It is important that we obtain business with government entities through bona fide, transparent means. In addition, we help government officials in the countries where we operate understand our business. It is important for us to share our experiences and insights, in an appropriate manner, on matters of public policy and regulations that may affect how we conduct business and assist our customers in delivering efficient and effective patient care.

Audits and investigations

Effectively working with regulators as they establish regulations and conduct audits and inspections is critical to maintaining Cardinal Health's reputation for trustworthiness. Contact the Legal department if you receive a request for information from a government agency.

Do the right thing

- Treat regulators professionally, with courtesy and respect
- Provide information accurately and truthfully
- Do not ignore requests for information, subpoenas or any other request from the government. Contact the Legal department
- Work with the Legal department to provide information to regulators or law enforcement authorities

Interactions with government-related customers

There are stringent laws and regulations that apply to our interactions with government-related customers and other organizations. Many government-related customers have conflicts of interest rules or similar policies which restrict or prohibit accepting anything of value (including meals and gifts) from vendors.

Do the right thing

- Report to your manager or the Business Conduct Line any concerns in connection with the award, performance or closeout of a government contract
- Contact the Ethics and Compliance department before you provide anything of value to a government employee or if you have any questions about transactions with government organizations, institutions funded by a government agency or individuals who work for a government entity or organization

Bribery and corruption prevention

Many countries in which we do business prohibit giving someone something of value to obtain an improper advantage. For example, the U.S. Foreign Corrupt Practices Act makes it a crime to bribe foreign governmental officials. In many countries, the employees of hospitals, clinics and pharmacies are government employees. In addition, we may be held responsible for the actions of our consultants, agents or distributors if they violate the law.

Do the right thing

- Know with whom you are doing business – follow our due diligence procedures and use available resources to verify information you receive
- Do not offer or give anything of value (e.g., gifts, cash, etc.) to, or otherwise attempt to, obtain any improper advantage from government officials or others with decision-making power or influence over any aspect of our business
- Accurately reflect all financial transactions in our books, records and accounts
- Follow Cardinal Health procedures for contracting, due diligence and training before hiring a consultant, agent, distributor or any other party to perform services for Cardinal Health outside of the United States

Interactions with elected officials/political contributions and lobbying

We are committed to complying with applicable federal, state and local laws and regulations, including the U.S. Honest Leadership and Open Government Act which places particularly stringent restrictions on interactions with members of the U.S. Congress. In addition, most countries, including the United States, have very stringent rules regarding political contributions and lobbying by companies.

Do the right thing

- Obtain prior approval from Government Relations before:
 - lobbying or meeting with a government official, individually or as a part of a group (e.g., trade association, customer visit, etc.)
 - engaging a lobbyist at either the state or federal level
 - inviting a state or federal legislator to a Cardinal Health facility
 - Obtain prior approval before providing meals, gifts, any form of entertainment, travel or other item of value to a U.S. federal or state representative or his or her staff
 - Notify your manager if you are seeking an elected office or want to accept an appointive office and explain how the duties of the office may affect your job performance
- Do not use Cardinal Health resources to support your choice of political parties, causes, political action committees or candidates
 - Always make clear that your political views, actions and contributions are your own and not necessarily those of Cardinal Health
 - Report to Government Relations any contribution requested by a U.S. federal representative, senator or member of his or her staff

Question and answer

Q: *A hospital customer has asked me to accompany him/her to a meeting with a state legislator. Because I am not attending specifically for Cardinal Health, do I need to inform anyone?*

A: Yes. It is very likely the customer asked you to join him/her because you are from Cardinal Health and the customer wants to leverage our size and position in the state to help with a particular issue. Cardinal Health is very active in many states and it is necessary to contact the Government Relations team to discuss the specific policy issue, whether Cardinal Health is currently working with that person and whether the state has requirements for reporting lobbying activity. The Government Relations team should be contacted prior to any visit.

Q: *The pharmacist at a state-owned hospital wants to conduct our business meeting at a local restaurant. In the past we have always split the cost, but this time he is insisting I pay for his meal as well. What should I do?*

A: Government employees, even pharmacists employed by state-owned hospitals, are subject to stricter rules than most of our other customers. You should not provide meals, gifts, any form of entertainment, travel provisions or other items of value to any customer (e.g., employee of a locally- or state-owned hospital, etc.) unless Cardinal Health policy, the policy of the customer's organization or entity and applicable laws allow it.

Learn more by reading these policies:

- Bribery and corruption prevention
- Charitable contributions
- Interactions with customers
- Political involvement and contributions
- Reporting obligations



8

Maintain accurate books and records

We record information accurately so that employees, customers, suppliers, investors and other stakeholders can trust the information and make informed decisions.

Why it matters

Employees make decisions every day based on the information recorded by other employees. Our customers, suppliers, investors and other stakeholders also rely on the information that we provide to them. In addition, business documents and communications may become public through litigation, government investigations and the media. As such, it is important that information is recorded accurately and not in a misleading fashion.

Books and records

Employees who create or maintain reports, records or any other information must take care to review the accuracy of that information and not create a false or misleading report. Particular diligence is needed when working with:

- Documents filed with or submitted to governments or regulatory agencies
- Expense reports
- Financial statements and related accounting entries and adjustments
- Production and quality records
- Time reports

Do the right thing

- While the technical requirements of financial reporting and other legal requirements provide the baseline guidance for what we must do, we should always strive to fully, fairly and accurately record the facts and substance of a transaction in reasonable detail to support the business needs as well as the financial reporting requirements of the company
- Do not enter into any transaction or agreement that improperly accelerates, postpones or otherwise manipulates the accurate and timely recording of business revenue or expenses
- Do not make a payment or establish an account on behalf of Cardinal Health with the understanding that any part of the payment or account is to be used for a purpose other than as described by the supporting documents
- Do not participate in any transaction where you have a reason to believe the other party intends to engage in improper accounting
- Correct any record that you receive that is not accurate and truthful - contact the Legal department if you have any questions about how to do so

Communication

Before sending, posting, emailing, discussing or otherwise allowing the content of any document to be seen, be sure your message is clear and concise and is not ambiguous. Cardinal Health prepares all public communications and disclosures in reports and documents we file with or submit to regulatory agencies in a full, fair, accurate, timely and understandable manner and in accordance with applicable legal standards for such filings and submissions.

Do the right thing

- In all communications, take care to avoid false, misleading or derogatory remarks or characterizations of people, the company or other companies, as well as the use of exaggeration, guesswork or legal conclusions
- Remember that email, instant messaging, voicemail and other forms of electronic communication may be a business record

Authority to act on behalf of Cardinal Health

Our customers, suppliers and the public must be able to trust that the person they are dealing with is authorized to act on behalf of the company.

Do the right thing

- Understand and adhere to the limits of your authority to act on behalf of Cardinal Health
- Sign only those documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful
- Refer all requests from investors or analysts to the Investor Relations department and all media requests to the Public Relations department

Question and answer

Q: *Our department is under pressure to meet the quarterly earnings projections. I think my manager reported inaccurate numbers last quarter to meet the projections thinking we could make it up this quarter. What should I do?*

A: It's never acceptable to report earnings that are not accurate. The company requires accuracy of all of our books and records. You should report questionable entries immediately to the Ethics and Compliance department or the Audit Committee of the Board of Directors or through the Business Conduct Line.

Q: *I have \$25,000 in financial approval authority. I need to have a \$75,000 invoice from a major, long-time supplier paid immediately. My manager has approved these invoices in the past, but my manager is out of town. Is it all right for me to split the invoice into three separate invoices?*

A: No, employees may not split invoices or expenses to avoid exceeding approval limitations. You must wait until your manager returns or find someone else with sufficient approval authority and knowledge of the transaction to approve the invoices.

Learn more by reading these policies:

- Accounting provisions of the U.S. Foreign Corrupt Practices Act
- Corporate authorization
- Expense reporting procedure
- False Claims Act compliance
- Financial accounting and reporting
- Information security and classification
- Media and Investor Relations



9

Protect information and assets

We properly use and take reasonable precautions to safeguard Cardinal Health information and physical assets.

Why it matters

Information created, obtained or compiled by or on behalf of Cardinal Health belongs to the company. Such information and the physical assets of Cardinal Health are critical to the continuing success and operation of the company and must be protected. We expect employees to respect and safeguard the company assets they use, including information, computers, personal electronic devices, furniture, buildings and vehicles.

Confidential information

You may not disclose Cardinal Health confidential information (e.g., customer lists, directories, files, reference materials and reports, computer software, data processing systems, computer programs, databases, etc.) to anyone outside the company unless: (1) a proper confidential disclosure agreement has been entered into; or (2) the disclosure has been properly authorized by Cardinal Health management and the Legal department. To protect confidential information, the use of audio and visual recording devices on company property, including cellular telephone cameras, is not permitted without prior approval of management.

Do the right thing

- Protect Cardinal Health confidential information and use it only for valid business purposes during your employment with Cardinal Health and after it ends
- Protect confidential information that other companies or individuals have entrusted to Cardinal Health during your employment with Cardinal Health and after it ends
- Properly label information to indicate how it should be handled, distributed and destroyed
- Do not disclose confidential information or intellectual property, including posting on online chat rooms, message boards or blogs
- Report if you know or suspect that confidential information has been lost and/or seen by unauthorized individuals
- Follow Cardinal Health procedures for reuse, redeployment and return of work equipment during your employment with Cardinal Health and after it ends
- Do not use assets in a manner that might lead to loss or damage, including uses that might introduce viruses or cause a breach of our information technology security
- Ask your manager for guidance if you are concerned about the appropriateness of responding to requests for information

Personal use

You are permitted to occasionally use the company's computer and telephone systems for personal purposes that are consistent with the company policies and *Standards of Business Conduct*, do not interfere with the performance of your responsibilities with Cardinal Health and are not otherwise contrary to the interests of Cardinal Health. Keep in mind that such use must be nominal in terms of time. Under no circumstances may you use company assets in any manner that is contrary to Cardinal Health policy or connected with offensive, sexually explicit or inappropriate material, including using your company-provided computer to view or send such material during or after normal working hours.

Do the right thing

- Keep personal use of company assets to a minimum
- Understand that personal messages on Cardinal Health computer and telephone systems may be monitored and you should not have any expectation of privacy
- Do not give the impression that you are speaking on behalf of Cardinal Health or misrepresent or disparage Cardinal Health in any personal communication, including online user forums, blogs, chat rooms or bulletin boards, regardless of whether the communication occurs via a Cardinal Health asset
- Do not use company assets or information in connection with any activity or employment other than your role at Cardinal Health

Personal information

Cardinal Health is committed to complying with the laws that govern the collection, use and management of personal information in the countries where we do business. Specific laws in many countries govern how employees handle personal information, prescription information or other patient-identifiable healthcare information.

Do the right thing

- Protect the personal information of current and former employees, directors, suppliers, customers, job applicants, patients, etc.
- Collect, use, maintain or share personal information in compliance with Cardinal Health policy and applicable law
- Report any concern that personal information might not be properly protected or the protections have been compromised

Intellectual property

Intellectual property (e.g., innovations, discoveries, ideas, etc.) is critical to the continuing success and operation of the company and must be protected as confidential and proprietary information. The unauthorized disclosure of intellectual property may jeopardize its legal protection. Employee contributions to intellectual property are the property of Cardinal Health. Employees agree that any and all rights to intellectual property (whether or not protected by patent, copyright, trademark or trade secret) are the property of Cardinal Health.

Do the right thing

- Promptly disclose to the Legal department any intellectual property you create through your employment
- Execute and process any applications, assignments or other documents that Cardinal Health deems necessary or advisable to obtain or protect our intellectual property during your employment with Cardinal Health and after it ends
- Do not use the company logo without permission

Question and answer

Q: *I'm a new employee. Please provide me with examples of Cardinal Health confidential or proprietary information and how to protect it.*

A: A good rule of thumb is that any information that has not been released to the public is confidential information and should not be discussed with anyone who does not have a legitimate business need to know it. Specific care should be given to confidential information that could put the company at a competitive disadvantage if it was disclosed (e.g., trade secrets, customer/patient/employee information, financial data, business plans, etc.)

The following are a few examples of how to protect confidential information:

- Put confidential information in a locked drawer before leaving the office
- Password protect or encrypt the data
- Store employee data in a fireproof, locked cabinet or electronically on an encrypted computer

Records management

Numerous laws require certain documents to be kept for various periods of time. You must identify, maintain, safeguard and dispose of records in the normal course of business in compliance with the current records retention schedule and any document preservation notice you may receive from the Legal department. Under no circumstances may you or anyone under your direction selectively edit or discard records.

Do the right thing

- Retain, protect and dispose of records according to company policy
- Contact the Legal department immediately if you learn of a subpoena or pending, imminent or contemplated litigation or government investigation
 - Retain and preserve records that may be responsive to the subpoena, are relevant to the litigation or that may pertain to the investigation until the Legal department advises you how to proceed
 - Take steps to preserve from destruction all relevant records (such as electronic and voice-mail messages) that without intervention would automatically be disposed of (destroyed or erased) according to the records retention schedule

Learn more by reading these policies:

- Information security and classification
- Patient privacy and HIPAA compliance
- Personal information protection
- Photographic and recording equipment
- Records retention

Q: *A customer emailed me a file containing patient data for Cardinal Health to analyze. After the analysis is complete, is it acceptable to email the patient data and the analysis back to the customer?*

A: Yes but due to the sensitive nature of patient data and legal requirements regarding privacy, you may do so only if the file containing the patient data and the analysis is encrypted. Contact the Ethics and Compliance department with any questions.



10

Encourage individual volunteerism and corporate social responsibility

We encourage involvement in the communities where we live and work which may include individual voluntary participation in community service and corporate social responsibility.

Why it matters

Cardinal Health is committed to being a responsible citizen in the communities and countries where we are located and encourages employees to share their time, talent, knowledge and skills with charitable organizations. The Cardinal Health Foundation matches employee contributions and encourages volunteerism by providing grants for individual or group support. We also strive to minimize our impact on the environment by requiring that every facility has an environmental, health and safety plan in place and by supporting waste reduction and recycling efforts at our facilities and in our communities.

Individual volunteerism

You are encouraged to let others know about your volunteer activities; however, always make clear that your views, actions and contributions to charitable organizations are your own and not necessarily those of Cardinal Health. In addition, when asking other employees to support a cause or join in a charitable event, take care not to pressure them to contribute to or join your preferred charitable or political causes. You may not use Cardinal Health resources or assets to support your choice of causes, unless permitted by company policy or procedure.

Do the right thing

- Learn more about the Cardinal Health Foundation to maximize the impact of your personal contributions to your preferred charities
- Talk to the Community Relations department about opportunities for volunteer leadership positions

Corporate social responsibility

Cardinal Health strives for a higher standard of business operation by supporting corporate social responsibility, including environmental stewardship. Part of Cardinal Health's commitment to the environment depends on employees acting in support of our environmental, health and safety practices and initiatives. While business segments have designated employees who coordinate and manage these programs for the company, all employees are responsible for environmental, health and safety performance. Each facility must have an environmental, health and safety plan in place that it follows and updates each year.

Do the right thing

- Minimize, to the extent practical, the adverse impact Cardinal Health products, processes and services have on the environment
- Reduce the use of energy, water and other resources where feasible
- Support waste reduction and recycling efforts at Cardinal Health and in your community

Question and answer

Q: *My team would like to support a local charity by helping them at their annual marathon. We would register participants, hand out water to the runners, etc.*

Does the Cardinal Health Foundation provide financial support for group volunteerism?

A: Yes. The Cardinal Health Foundation provides financial support, in the form of team building and team fundraising grants, to local charities when a group of employees volunteer to help the charity with an event like you described. The Foundation also provides leadership grants for employees who are board members of non-profit organizations. Consult the Charitable contributions policy and related procedures to make sure your event qualifies.

Q: *Our business unit would like to donate some products overseas to a country recently devastated by a hurricane. Can we do that?*

A: We typically work through established international organizations in order to comply with regulatory and legal requirements. In general, we do not donate pharmaceuticals but may donate other products. Contact the Legal, Quality and Regulatory Affairs or Global Trade departments for prior approval of any donations.

Learn more by reading these policies:

- Charitable contributions
- Environmental, Health and Safety
- Solicitation and distribution

Business Conduct Line

Contact the Business Conduct Line through the Internet at www.businessconductline.com or by telephone at the toll-free numbers listed below.

Country	Telephone number	Country	Telephone number
Canada	800.926.0834	Taiwan	00.800.1777.9999
China	00.800.1777.9999	Thailand	001.800.13.202.5266
Dominican Republic	888.751.8411	United Kingdom	0.800.051.7053
Malaysia	00.800.1777.9999	United States	800.926.0834
Mexico	001.866.366.1883	All other countries (*call collect)	720.514.4400*
Singapore	001.800.1777.9999		

Resource list

Resource	Contact information	Scope
Your manager		Ask questions, raise issues, seek guidance or raise concerns
Community Relations	614.757.7481	Non-profit contributions, volunteerism and community involvement
Environmental, Health and Safety	614.757.7713	Environmental, health and safety matters, including compliance programs and management systems
Ethics and Compliance	614.757.7504 (telephone) 614.757.6948 (fax) 7000 Cardinal Place Dublin, OH 43017 USA	Ask questions, raise issues, seek guidance or raise concerns about any issue, including Standards of Business Conduct and companywide corporate policies and any other ethics or compliance concerns, questions regarding gifts and entertainment or interactions with customers
Global Security	614.757.3333	Security issues regarding people, property, products or information and drug testing policies and procedures
Global Trade	614.757.5033	Import, export and boycott issues
Government Relations	614.757.7769	Political activity and contribution issues
Human Resources	1.866.HR1STOP (1.866.471.7867)	Employment matters (e.g., harassment, workplace violence, substance abuse)
Investor Relations	614.757.7542	Shareholder or analyst inquiries or issues
Legal	614.757.6421	Interpretation of local laws, questions regarding gifts and entertainment, bribery and corruption prevention, fair competition, trading in stock, antitrust, healthcare fraud and abuse, interactions with customers, record management, intellectual property, consultants, agents or any other legal issue, concern or question
Public Relations	614.757.6225	Media inquiries or issues
Quality and Regulatory Affairs	847.887.3399 (Medical) 614.757.4020 (Pharmaceutical)	Diversion and prior approval of any donations of prescription drugs or medical devices
Audit Committee of the Board of Directors	Audit Committee of the Board of Directors, c/o Chief Legal and Compliance Officer, 7000 Cardinal Place, Dublin, OH, 43017 USA.	Written concerns regarding accounting, internal accounting controls, financial reporting auditing or other ethical matters

This booklet does not create a contract of employment between Cardinal Health and any Cardinal Health employee, nor does it alter the at-will employment relationship or any employment contract and/or agreement between Cardinal Health and any Cardinal Health employee. In addition, this booklet does not create an implied or expressed promise for specific treatment in a specific situation. The current edition of the ***Standards of Business Conduct*** is posted on the Internet and intranet. Companywide policies and procedures described in this booklet are posted on the intranet. The ***Standards of Business Conduct*** and Cardinal Health policies and procedures may be amended from time to time and all amendments are effective immediately upon posting. It is the responsibility of each employee to review the ***Standards of Business Conduct*** and Cardinal Health policies and procedures from time to time to ensure that he or she is in compliance.

