

## West Pharmaceutical Services, Inc. Anti-Corruption Policy Statement

### Commitment

West is committed to conducting its business ethically in compliance with all applicable laws, rules and regulations and meeting its obligations to its shareholders. This commitment is embodied in our Code of Business Conduct and reiterated here.

Bribery is strictly prohibited. The use of Company funds or assets for any unlawful, improper or unethical purpose, such as making improper payments or offering anything of value to unlawfully influence another individual's decision-making is strictly prohibited.

West is a signatory to the UN Global Compact and supports the 10 principles outlined in the UN Global Compact Framework.

This anti-corruption policy statement demonstrates the commitment from the Chief Executive Officer (CEO) to applying the highest standards of ethical conduct, integrity and corporate governance in West's business activities. Every employee, individual and entity acting on West's behalf is responsible for conducting the company's business with honesty and transparency.

### Policy Obligations

#### *Bribery and Corruption Prevention*

Management must take the necessary steps to maintain an effective system of internal controls and monitoring to help prevent Bribery and corruption. These must include taking steps to help ensure all Books and Records are accurately kept and appropriate education and training of Employees

#### *Risk Assessment*

Management must carry out on a periodic basis an assessment of the businesses' risks of Bribery. Where Bribery and corruption risks are identified, they should be managed within West's risk management framework

#### *Facilitation Payments*

Facilitation Payments are strictly prohibited. Any requests for Facilitation Payments must be reported immediately to the Chief Compliance Officer

#### *Charitable Contributions*

Employees may only make Charitable Contributions on the Company's behalf after obtaining the written approval from management and the Chief Compliance Officer. Charitable Contributions on the Company's behalf may only be made after obtaining the written approval from management. Care must be taken to help ensure that the recipient is a bona fide charity and not operated directly or indirectly by or for the private benefit of a Public Official or a Closely Related Individual of a Public Official. All Charitable Contributions must be made in accordance with applicable local laws and regulations in accordance with West's authorizations and delegations policy and recorded appropriately in West's books and records.

### *Political Contributions*

Company businesses are not permitted to make Gifts or Political Donations or to offer Entertainment to political parties or candidates for political office.

### *Commercial Bribery*

West prohibits any form of Bribery, including Bribery of non-governmental partners, such as any corrupt dealing with the agents or employees of potential buyers to secure an advantage over business competitors.

### *Transactions with Third Parties*

West may be held responsible for the actions of a Third Party under anti-bribery laws. Therefore, management must ensure an appropriate level of due diligence for all new and existing Third Parties.

### *Mergers and Acquisitions*

Mergers and acquisitions raise unique concerns under international anti-corruption laws because West can be held accountable for past or continuing corruption violations performed by the target company. Management must ensure an appropriate level of due diligence before a merger or acquisition agreement is signed and before the transaction closes.