



WEST PHARMACEUTICAL  
SERVICES, INC.

# CODE OF CONDUCT



DOING THE RIGHT THINGS  
THE RIGHT WAY, **EVERY DAY.**



# A MESSAGE FROM THE CEO

Dear West Team Members, Suppliers & Partners:

Every day West helps to improve the lives of millions of people around the globe. To do so, we hold ourselves to the highest standards of quality, integrity and respect - for our customers and ourselves. Together, we work as one team to provide value to our business partners and to ensure the safe and effective administration of life-saving drugs to patients.

Our core values -- Passion for Customers, Leadership in Quality and One West Team -- are reflected throughout the Code of Conduct and establish the central principles that govern all that we do at West.

All West Team Members must uphold these values to help ensure that West continues as a well-respected, ethical and lawful leader in the healthcare industry.

Our collective success depends on our integrity and each of our actions, so please read and make sure you understand and comply with the Code of Conduct.

Every West Team Member is responsible for ensuring that our reputation remains strong, and for fostering a culture in which compliance with the Code of Conduct and adherence to our core values is paramount.

If you have a question or concern about what is proper conduct for you or anyone else at West, please raise the issue with your manager, the Business Compliance and Integrity Department, the Law Department or Human Resources.

Thank you for taking the time to review the West Code of Conduct. Together, we can maintain our trusted reputation, increase our customers' confidence in our products and services and continue to lead with the integrity and honesty that is expected from West.

Sincerely,

Eric Green



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# WEST BUSINESS COMPLIANCE & INTEGRITY

## COMPLIANCE WITH LAWS, REGULATIONS & INDUSTRY CODES

West is committed to fully complying with the laws, rules and regulations of the countries where we operate. West Team Members, suppliers and business partners are responsible for complying with all applicable laws, rules, regulations and company policies.

## ROLES & RESPONSIBILITIES

### West Team Members

- Be knowledgeable about the West Code of Conduct, company policies and procedures that relate to your individual job responsibilities.
- Be aware of developments in your work area or industry that might impact West's compliance with laws and regulations or reputation.
- Speak Up promptly to raise any concerns about potential violations of law, regulations, or the West Code of Conduct or company policy.
- Cooperate fully and honestly in reviews and internal investigations.

### Team Leaders

Be accountable for creating a culture of business compliance and integrity in which West Team Members understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities include:

- Setting the example for integrity, through words and actions.
- Ensuring West Team Members understand that business results are never more important than ethical conduct and compliance with the West Code of Conduct or company policies.
- Creating an environment where every West Team Member feels comfortable raising concerns or speaking up.
- Taking immediate action, where appropriate, to prevent or address a concern.
- Communicating sincerely and effectively the importance of business compliance.
- Committing adequate resources to monitoring the business's compliance activities on an ongoing basis and conducting periodic audits of key processes.



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## BUSINESS COMPLIANCE & INTEGRITY

- All West Team Members are expected to take ownership of business compliance and to act with integrity. West's success depends on your personal commitment to comply with this expectation.
- Acting with integrity means delivering on our commitments while adhering to West's Mission and Values, and our Standards. We can do this by:
  - taking responsibility and holding each other accountable;
  - raising concerns and asking questions; and
  - making the right decisions even when they are difficult.

## SPEAK UP

### Obligation to Raise Integrity Concerns

- West Team Members, suppliers and business partners are responsible for acting with integrity at all times, and for raising concerns about risks to the Company.
- Non-compliance with the West Code or company policies can have severe consequences for West, its customers, investors and West Team Members. By raising concerns, you give management the chance to address potential problems and protect the Company.
- If you reasonably believe that a co-worker has violated or may violate a law, regulation, the West Code of Conduct or company policy, you have a duty and responsibility to report that information immediately to your manager, another manager, Human Resources or the Business Compliance & Integrity department.
- West's anti-retaliation and confidentiality policy protects West Team Members who report a concern in good faith. Every effort is made to protect the identity of anyone who reports a concern or participates in a review or internal investigation.

### Why is it important to make a report?

- West needs to know about your concerns so that potential compliance or ethical issues may be investigated and addressed quickly and appropriately.
- Many issues can be resolved locally before they become problems for West Team Members, the Company or the public. We encourage you to raise concerns and ask questions—especially those of a legal or ethical nature, but also those relating to quality of work and working environment.
- Promptly raise any concerns about potential violations of any West policy or this Code.
- West offers several methods for raising concerns, including your manager, any company manager, any member of Human Resources, the Business Compliance & Integrity department, the Law department, or the Integrity Helpline ([www.west-helpline.com](http://www.west-helpline.com) or 1-800-461-9330).

### Good Decision Making

- To maintain the respect of our stakeholders, including West Team Members, our customers, government agencies and the communities in which we operate, we must navigate the global business market ethically and act with integrity at all times.
- Good decision-making means knowing when to ask for help. Here are a few simple questions to help you get to a good decision that is aligned to West's Values, Code of Conduct, policies, procedures, applicable laws and regulations.
  - Does this action or decision align with West's mission and values?
  - Does this comply with the West Code of Conduct, Company policies, or local laws and regulations?
  - How would this decision look to others—at West, our customers, our shareholders or regulators?
  - Will my action protect my own and West's reputation?
  - Have I consulted the appropriate Company resources?

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# OUR WORKPLACES

## MUTUAL RESPECT

- West strives to maintain a workplace of mutual respect that is consistent with our values and complies with applicable laws.
- West Team Members, contractors, vendors and business partners are expected to always treat each other with respect and professionalism.
- West does not tolerate discrimination, bullying or harassment of any Team Member, customer or service provider because of age, race, color, religion, sex, ancestry, national origin, military service or application, marital status, citizenship status, physical or mental disability, genetic information, sexual orientation, gender identity or expression, or other protected characteristic under applicable laws.

## HEALTH & SAFETY

- West is committed to providing work facilities that are safe and healthy for West Team Members, guests, contractors, suppliers, business partners and the community.
- West Team Members must make efforts to reduce safety risks in the workplace and immediately report any unsafe conditions or activities to a manager, Human Resources or site safety coordinator.
  - West will not tolerate acts or threats of violence, including verbal or physical threats, intimidation, bullying, harassment or coercion.
  - West prohibits the use of alcohol, the possession, sale or use of illegal drugs or drug paraphernalia on West premises or while conducting West business off Company premises.
  - During working hours, West Team Members should not use medically prescribed drugs that create a threat to safety (e.g., medications that cause drowsiness).
- West reserves the right to search items on Company property, including offices, desks, computers, company-issued equipment, cars and lockers at any time, to the full extent permitted by local law.
- Behavior that threatens the safety of people or property, or has the potential to become violent, must be immediately reported to a manager, Security, Human Resources, the Business Compliance & Integrity department, the Law department, or the Integrity Helpline.



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**BUSINESS COMPLIANCE & INTEGRITY EMAIL**  
WEST.INTEGRITY@WESTPHARMA.COM

**INTEGRITY HELPLINE**  
WEST-HELPLINE.COM OR 1-800-461-9330

## DIVERSITY & ENGAGEMENT

- West is a diverse, equitable, and inclusive workplace.
- The One West team is a diverse population located around the globe, with different life, educational and cultural experiences.
- West is committed to supporting and promoting inclusive practices by creating a safe and welcoming environment for current Team Members, and for those talented candidates we seek to attract.

## CONFLICT OF INTEREST (COI)

- The personal interest of a West Team Member must not influence or appear to influence our business judgment or decision making.
- All decisions regarding West and its business interests must be based solely on what is best for West and its stakeholders and must not be improperly influenced by personal interests.
- West Team Members may not compete with West or enter into an engagement that directly or indirectly serves a West customer, supplier or competitor.
- West Team Members must disclose actual or potential conflicts of interest to the Business Compliance & Integrity department as soon as possible.
- West Team Members may not accept employment outside West or conduct their own business if there is a potential conflict of interest.



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# OUR PRACTICES

## ANTI-BRIBERY & ANTI-CORRUPTION

- West is committed to ethical business conduct and does not tolerate bribery or corruption.
- West does not bribe public officials, private individuals or entities.
  - West does not accept any bribes.
  - West prohibits Team Members, suppliers and agents from directly or indirectly engaging in any form of bribery.
  - West prohibits facilitation payments.
  - West prohibits Team Members, suppliers, and agents from giving or receiving gifts, perks or other things of value in order to influence, gain access or do business with or for West.
- Where permitted by law, modest meals or hospitality may be provided by West Team Members, suppliers or agents to customers or other external stakeholders.
- Please consult with your manager and a member of Legal or Business Compliance & Integrity for more information.

## FAIR COMPETITION, ANTI-TRUST & TRADE SECRETS

- West is committed to free, fair and open business competition and to competing ethically and in compliance with laws that foster competition in the marketplace.
- West abides by the laws, rules and regulations about anti-trust, fair competition, and the protection of trade secrets.
- West prohibits agreements between our Company and our competitors that affect prices, terms or conditions of sale, or fair competition.
- Violations of antitrust laws, either deliberate or accidental, expose West and individual West Team Members, officers and directors to serious civil or criminal penalties or lawsuits. Even the appearance of an understanding with a competitor may bring serious penalties.
- West does not seek trade secret information from individuals who are obligated not to disclose the information, nor does West use improper ways to obtain non-public competitor information.

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## INSIDER TRADING

- West Team Members must not buy or sell West's stocks, bonds, options or other securities while aware of "inside information"—material nonpublic information—relating to West.

## QUALITY @ WEST

- West designs, manufactures and provides high-quality products that are safe and effective for their intended use.
- West products and services comply with applicable laws, regulations and industry standards.
- Quality product and system controls are designed to ensure compliance with our high standards and applicable laws.
- West products are properly registered with the relevant regulatory body using truthful and complete information.

## DATA PRIVACY & PROTECTION

- Each West Team Member is responsible for the proper use of West's property and facilities.
- Subject to local law, scientific discoveries, formulas, computer codes and programs, publications, manufacturing processes and other intellectual property created as a result of work at West automatically becomes West's property.
- West respects and protects the privacy of our Team Members, business partners and other third parties, and is committed to the ethical management of personal information in its possession.
- West Team Members must use information systems and data assets appropriately, consistent with Company policy, and protect them from loss, theft, damage, misuse or abuse.
- West maintains administrative, technical and physical safeguards designed to protect this information, including personal data, from accidental, unlawful or unauthorized access, alteration or use.

- West Team Members must not provide "inside information" to another person who might use it to buy or sell West securities, including spouses, relatives and friends.
- Please contact the Law Department with any questions about making any securities purchases or sales.
- Each West Team Member is expected to provide high-quality work, be familiar with laws and regulations that relate to their areas of responsibility and participate in training programs provided by the Company.
- West Team Members are encouraged to identify and improve practices that could impair product quality, safety or compliance with law.
- West adheres to regulatory and generally accepted good manufacturing and laboratory practices, and quality system requirements.

- West may monitor personal communications on a company network or system for business reasons, to properly review the use of corporate assets, correct technical issues, investigate possible wrongdoing and ensure compliance with applicable laws.
- Each West Team Member has a responsibility to report any theft or attempted theft of West property to Business Compliance & Integrity department.



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## WEST'S RECORDS

- All of West's books, records and accounts must fully and accurately reflect the true nature of its business transactions (e.g., financial statements, time sheets, expense reports, bills, payroll and benefits records, and other essential Company data).
- All Company records are West's corporate assets. These records may be subject to many legal or regulatory requirements and must be maintained according to West's Record Retention policy.
- West Team Members are responsible for retaining and protecting Company records that they access or control.
- Confidential information includes information concerning pricing, products and services under development, and any other non-public information that might be of use to competitors, or that could be harmful to West or its customers if disclosed.
- West Team Members must safeguard the Company's proprietary and confidential information in the same way as other Company assets are protected.
- Each West Team Member has a duty to maintain the confidentiality of a third party's trade secrets and proprietary information, including those of a former employer, and no West Team Member should ever knowingly infringe on the rights of others.
- Confidentiality also requires that you not discuss confidential information about West Team Members, customers, business partners or suppliers with anyone other than another West Team Member who has a proper business need to know this information.



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# OUR COMMUNITIES

## INTERNATIONAL BUSINESS

- West and its affiliates engage in business around the world and abide by the laws and regulations which apply in all locations where we do business, including:
  - the import and export of products and technical data;
  - the conduct of business with non-U.S. entities;
  - international tax;
  - anti-boycott;
  - implemented economic sanctions and trade embargoes that prohibit or restrict direct or indirect transactions with certain countries, certain individuals or companies.
- West periodically screens, as permitted by local law, against the Specially Designated Nationals and Blocked Persons List (SDN) and debarred party lists, to ensure our transactions are permissible.
- West abides by all laws, rules, governmental directives, declarations and regulations regarding trade and economic sanctions
- West Team Members must not engage in, or agree to engage in, transactions with individuals, entities or countries without first verifying the transaction is permissible.

## HUMAN RIGHTS

- West is committed to operating in ways that meet fundamental responsibilities in the areas of human rights and labor, including the protection of internationally proclaimed human rights, the freedom of association and collective bargaining, elimination of forced and compulsory labor and human trafficking, abolishment of child labor, and eliminate discrimination in employment.
- West is also committed to following the UN Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development's (OECD's) Guidelines for Multinational Enterprises.



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## ENVIRONMENTAL SUSTAINABILITY & ESG

- Caring for our environment is inherent in all we do, ensuring that we use resources in a sustainable manner and believing that we have an obligation to contribute to a healthier world.
- West is committed to protecting the environment with a Sustainability Program designed to target reductions in areas where we can make an impact, such as CO2 emissions, waste and increased recycling, as well as energy and water usage.

## COMMUNICATING PUBLICLY

- West markets and sells products in compliance with all applicable laws, rules and regulations.
- Communicating publicly about West, its products, programs and activities must be factual, thoughtful and handled appropriately by designated Team Members.
- Only designated communications Team Members are authorized to post about West on Social Media (e.g., LinkedIn, Indeed, WeChat, YouTube, etc.).
- All external publications or uses of the West logo, name or other images must be approved in advance by Global Communications.
- Any inquiries or requests from the press, media, financial community or the public regarding business or financial information about West must be referred to Global Communications (media/press) or Investor Relations (investors or analysts).



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## WEST CODE OF CONDUCT

### EFFECTIVE SEPTEMBER 2022

Nothing contained in the West Code of Conduct is intended to affect your rights under applicable employment and privacy laws. In addition, nothing in the West Code of Conduct is intended to confer—or may be interpreted to confer—any express or implied contractual right to remain employed by the Company. Further, the West Code of Conduct does not guarantee any fixed terms and conditions of employment.