



Speak Up Policy

Version 2.0
Date Issued: March 29, 2023
Issued By: Catalent Legal & Compliance Department

1. Scope

This policy is intended to set out Catalent’s commitment to a safe, supportive environment that encourages anyone having a “work-based” relationship with Catalent (including, for example, current employees, past employees, job applicants, customers, contractors, and suppliers) to **Speak Up** about misconduct that any of them observe, whether within the company or in the actions of a customer, supplier, or service provider. We strongly encourage you to report such concerns utilizing one of the channels set out within this policy for reporting, investigating, and remedying misconduct. Nothing in this policy, however, prevents anyone from reporting misconduct or providing information to or otherwise assisting any regulatory body in performing its functions or duties consistent with or in relation to applicable law.

2. Policy Responsibilities

Policy Ownership	Assistant General Counsel, Compliance & Litigation
Policy Approval Officers	SVP, General Counsel & Chief Compliance Officer SVP, Chief Human Resources Officer VP, Internal Audit SVP, Quality & Regulatory Affairs
Policy Implementation	Assistant General Counsel, Compliance & Litigation

3. Policy Overview

Catalent is committed to conducting business with fairness, integrity, and respect for the law, our values, and each other. Despite this commitment and the best efforts of the vast majority of our employees, individuals may at some point engage in conduct that seems to violate the law, applicable regulatory standards, our Standards of Business Conduct, or our other policies. Anyone who observes or suspects such behavior is encouraged and expected to Speak Up. Doing so gives Catalent the opportunity to address the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust within our organization.

Catalent values the help of employees who identify and Speak Up in good faith about suspected misconduct. Speaking Up is encouraged, and employees who Speak Up are protected. You will not suffer any form of retaliation for raising concerns in good faith about suspected misconduct. After all, Speaking Up is essential to the culture reflected in our mission, vision, and values, a culture that sustains our reputation, success, and ability to operate—both now and in the future.

It is important to report potential misconduct as soon as possible. Raising the concern quickly allows Catalent to undertake an investigation while the facts are still fresh and quickly mitigate or eliminate any related risk.

3.1 Objective

Early detection and reporting of possible misconduct by Catalent employees enable the company to take prompt corrective action. Catalent’s employees are its first and best line of defense against the negative impact such behavior can have on the company, our employees, customers, or shareholders, and ultimately on the patients who rely on the work that we do. An effective Speak Up policy depends on maintaining a culture of trust and integrity in which all employees:

- a) Are encouraged to report potential misconduct as soon as possible, knowing that their concerns will be taken seriously and appropriate action will be taken in response;
- b) Know and use the channels available to them to report potential misconduct; and
- c) Trust that the process is treated as confidentially as possible and understand and believe that Catalent has no tolerance for victimization, retaliation, retribution, or detrimental treatment of any kind.

3.2 Responsibilities

It is the responsibility of all current officers, directors, employees, associates, and temporary workers to raise concerns of misconduct in a timely manner. We also want to hear from any party with which Catalent has or had a business relationship (such as Catalent’s customers, suppliers, contractors, agents, and distributors).

Every employee who receives a report of misconduct is expected to treat the concern or allegation with discretion, and to treat the individual who brought the concern forward with respect. The manager is expected to escalate the concern according to Catalent’s escalation criteria (see [Catalent’s Escalation Criteria](#)).

3.3 Policy Details

What Type of Conduct is Covered by the Duty to Speak Up?

Criminal activity (including fraud, theft, bribery, kickbacks, and insider trading)	Improper use of company resources
Quality and regulatory concerns	Breaches of Catalent’s Standards of Business Conduct
Discrimination or harassment	Data integrity violations
Conflicts of interest	Environmental, health, and safety issues
Violations of any Catalent policy	Conduct with a substantial chance of damaging Catalent’s reputation or the reputation of any Catalent site or employee
Retaliation or retribution for reporting potential misconduct	Human rights violations

What Behaviors or Situations are **Not** Covered by this Policy?

- Reporting events presenting an immediate threat to life or property. If you need emergency assistance, immediately contact your local Catalent Security team or local governmental authority.
- Any grievance you may have in relation to your terms of employment.
- Settling personal disputes.
- Making accusations that you know or reasonably suspect are false or misleading. Doing so may lead to disciplinary action.

If you believe that misconduct has or is likely to occur, you are expected to report it. The various ways you can do this are explained below. If you are uncertain as to whether an activity is covered by this policy, you should speak to your manager or any member of the Legal & Compliance Department.

What Does it Mean to Speak Up?

Anyone who observes or suspects behavior that seems to violate the law, applicable regulatory standards, our Standards of Business Conduct, or our other policies is encouraged and expected to Speak Up about the potential misconduct as soon as possible in order to allow Catalent the opportunity to promptly investigate, to swiftly address the issue, and to quickly mitigate or eliminate any related risk.

If you know about or suspect misconduct, Speak Up with the facts that you have. We do not expect that you will have all the answers. You are certainly not required to prove that a violation occurred. There is no need to—and you should not—investigate the matter yourself. We want you to Speak Up as early as possible so the company can determine if there is reason for concern and determine the appropriate next steps.

Catalent treats concerns raised and reports made in good faith confidentially to the extent possible. Individuals who bring concerns forward in good faith are protected from retaliation for Speaking Up.

What Should I Include in My Report?

In Speaking Up, you should provide as much detailed and specific information as the circumstances permit (whether or not your report is made anonymously, as permitted by local law) to allow for a thorough investigation of the matter. Any report made should remain factual; providing the who, what, when, where, and why will assist the investigator to conduct a thorough investigation. Factual information includes details, such as the following:

- The background and history relating to the concern, including what you observed yourself (as opposed to what you heard from others).
- Names of those individuals involved or who are witnesses, dates of occurrences, and places where the events occurred.
- Any documents that may support your report.
- An explanation as to why the issue is concerning.

You should not include accusatory or conclusory statements in your report, to the extent possible, as you may not know the full story, which the investigators will seek to learn in order to reach conclusions based on the evidence.

How to Speak Up

We hope all employees will feel comfortable raising concerns about actual or possible misconduct openly and directly with their manager or their manager's manager, but those are not the only options. Other channels include:

Site Leadership

Your site's leadership team

Human Resources Department

Your site's Human Resources leader or any member of the Human Resources team.

Business or Functional Unit Leadership

Your business or functional unit's leadership team

Internal Audit Department

14 Schoolhouse Road
Somerset, NJ 08873 USA
internal_audit@catalent.com

Quality & Regulatory Affairs Department

14 Schoolhouse Road
Somerset, NJ 08873 USA
quality@catalent.com

Legal & Compliance Department

T +1 732 537 6412
F +1 732 537 6491
14 Schoolhouse Road
Somerset, NJ 08873 USA
ethics@catalent.com

Catalent's Business Conduct Helpline

Reachable at CatalentMSW.com or by telephone at:

United States	all other countries
+1 800 461 9330	+1 720 514 4400

In countries outside the U.S. where local, toll-free telephone numbers are available, those country-specific numbers are accessible via the drop-down menu available at www.CatalentMSW.com. This channel may be used to report a misconduct-related concern in a secure manner which guarantees the confidentiality of the reporting party and any third party mentioned. Access to these reports is limited to Catalent's Ethics & Compliance group and those individuals supporting it in investigations. Unauthorized access is not permitted.

For individuals located in the European Union ("EU"), consistent with the EU Whistleblower Directive ("EUWD"), Catalent provides an internal, local channel for individuals who prefer to have the investigation of their concern led by local personnel. This local option is available for selection when reporting a concern on www.CatalentMSW.com. Individuals reporting a concern may also speak directly with local personnel. A directory of local resources for EU countries with Catalent facilities can be found by visiting the Ethics & Compliance site on SharePoint. Alternatively, a reporting party can choose the company's Ethics & Compliance group to take the lead on an investigation or contact the group at ethics@catalent.com.

Catalent's Board of Directors

Corporate Secretary
Catalent, Inc.
14 Schoolhouse Road
Somerset, New Jersey 08873 USA
CorpSec@catalent.com

There may be certain circumstances where individuals believe they cannot communicate a concern of misconduct using the above-listed channels. In such a situation, that individual may communicate directly with the Chair or Lead Independent Director of Catalent's Board of Directors (the "Board"), the Chair of the Board's Audit Committee, or any of our directors individually or as a group by contacting Catalent's Corporate Secretary either by mail or email at the addresses provided immediately above. Such communications should be clearly marked as both confidential and urgent., The Corporate Secretary must forward all such communications to the Ethics & Compliance group within the Legal & Compliance Department to investigate the concern.

EU-Specific Considerations Relating to How to Speak Up

While Catalent encourages reporting such concerns through the company's internal channels, the EUWD provides two additional options outside of Catalent. First, a concern can be reported to the authority established by each EU country to receive whistleblower complaints. The appropriate authority to contact in each of the EU countries where Catalent has facilities can be found

in the directory located on the Ethics & Compliance SharePoint page. Secondly, the concern can be disclosed publicly through online platforms, social media or directly to the press. Individuals who make a public disclosure receive protection under the EUWD in any of the following circumstances:

- A report was made internally or externally, but no appropriate action was taken within the relevant EU country's specified timeframe (either three months or six months, depending on the country).
- The reporting party reasonably believes that the concern reported constitutes imminent danger to the public interest.
- The reporting party reasonably believes that if they report the concern to the respective EU country authority, there is a risk of retaliation or low prospect of the concern being effectively addressed.

Additional details on specific EU country national laws and the Competent Authority responsible for receiving concerns is available in the Appendix of this Policy.

You may report suspected misconduct anonymously in those countries where doing so is legally permissible.

What Happens When I Report a Concern?

When a concern is raised through any of the Catalent channels listed above, the company will promptly respond to the matter. All concerns will be acknowledged within seven days of receipt.

Catalent takes every report of alleged misconduct seriously. Depending on the allegations, Catalent may appoint an internal or external investigator (or team of investigators) to objectively gather and review the facts and to determine whether any violation of law, applicable regulation, or Catalent policy took place.

Investigations are conducted in an independent, fair, and unbiased manner with respect to all parties involved. Catalent conducts thorough investigations in accordance with relevant laws and principles. The details of the matter, your identity, and the identity of anyone else mentioned in the report are treated as confidentially as possible during an investigation and after the matter is closed. Details of an investigation are shared within (or outside) of the company only to those who have a need to know the information.

Unless necessary to conduct an adequate investigation, implement corrective and preventative actions (CAPAs), or compelled by judicial or other legal process, neither Catalent, the Audit Committee nor any director, officer or employee of Catalent shall (i) reveal the identity of any person who reports a concern and asks that his or her identity remain confidential, or (ii) make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a report anonymously.

Investigators will treat witnesses in a professional manner and with dignity and respect. At the conclusion of any investigation, the investigators may recommend changes to enable Catalent's continuous improvement and to minimize the risk of future misconduct. If a concern regarding reported misconduct is substantiated, the situation will be resolved through appropriate corrective action. Such corrective action may include clarification of a company policy, additional training, facility or process changes, or disciplinary action.

Whenever possible, the reporting party will be informed of the status of the investigation and the outcome of the matter. Reporting parties can expect an update within three months of submitting a concern. Catalent has confidentiality obligations to all employees, including those who report concerns, as well as those who are interviewed and/or investigated as a result. As such, Catalent aims to keep the reporting party informed of the progress of the investigation

and its likely timetable for completion. However, the need for confidentiality and other legal considerations sometimes prevent us from providing specific details concerning an investigation or any disciplinary action taken as a result.

Can I Report a Concern Anonymously?

When reporting a concern through Catalent's Business Conduct Helpline (www.CatalentMSW.com), you are given the opportunity to do so anonymously. Catalent's Business Conduct Helpline is managed and controlled by an independent third-party vendor. This independent company allows Catalent employees—as well as those who do business with or otherwise interact with the company—to share concerns or incidents, while being anonymous to Catalent, if desired.

Below are the different levels of self-identification available when reporting a concern using Catalent's Business Conduct Helpline:

- **Remain completely anonymous:** You will not reveal your name or contact information to the independent third-party vendor or to Catalent.
- **Remain anonymous to Catalent:** You can choose to reveal your name and contact information to the independent third-party vendor, but not to Catalent. This option allows the vendor to contact you confidentially to gather additional information about the report, without revealing your name or contact information to Catalent.
- **Share my name and contact information:** If you are comfortable revealing your name and contact information, you can provide both to Catalent and to the independent third-party vendor.

While you can report anonymously, Catalent encourages non-anonymous reporting for a variety of reasons, including aiding in a robust and efficient investigation.

Cooperation is Required

All employees are expected to cooperate fully with any Catalent-designated investigator, providing complete and truthful information. Any employee who fails to cooperate with an investigation or lies to or misleads an investigator will be subject to disciplinary action up to and including termination of employment.

Employees who have been informed or become aware of ongoing investigations for which they have potentially relevant records (*e.g.*, memoranda, electronic mail, instant messages, files, notes, photographs, recordings, etc.) must retain these records and provide them to Catalent and the investigator. Any employee who knowingly destroys or alters potentially relevant records or information will be subject to disciplinary action up to and including termination of employment.

Retaliation is Prohibited

Catalent strictly prohibits and does not tolerate any form of discipline, reprisal, intimidation, or other act of retaliation for good-faith reporting of suspected violations of any Catalent policy, law, or regulation, or for cooperating in investigations of suspected violations of any Catalent policy, law, or regulation. For more information on Catalent's policy prohibiting retaliation, please refer to our [Non-Retaliation Policy](#) or contact your Human Resources representative.

4. Supporting Information

4.1 Glossary of Terms

Term	Description
Retaliation	Includes adverse employment action such as dismissal, demotion, poor performance evaluation, or the threat of such action, as well as more subtle acts such as shunning, isolation, mocking and/or defamation, directed against an individual on the basis of or in reaction to that individual making a good faith report of suspected violation of law, regulation, Catalent's Standards of Business Conduct, or any other Catalent policy or procedure. The use of threats or intimidation to prevent the reporting of a concern or to affect the outcome of an investigation will be treated as retaliation under this policy.

4.2 References

Number	Details
1	Standards of Business Conduct
2	Escalation Criteria
3	Non-Retaliation Policy
4	Fair Treatment Policy
5	Whistleblower Policy

4.3 Policy Approvals

This policy has been approved by the following individuals:

Yevgenia (Jane) Kleiner

Yevgenia (Jane) Kleiner (Mar 30, 2023 10:40 EDT)

Yevgenia S. Kleiner, Asst. General Counsel, Compliance & Litigation

Date 30-Mar-2023

Joseph Ferraro

Joseph Ferraro, SVP, General Counsel & Chief Compliance Officer

Date 30-Mar-2023

Ricardo Pravda

Ricardo Pravda (Mar 30, 2023 13:21 EDT)

Ricardo Pravda, SVP & Chief Human Resources Officer

Date 30-Mar-2023

Shetal Patel

Shetal Patel (Apr 3, 2023 12:46 EDT)

Shetal Patel, VP, Internal Audit

Date 03-Apr-2023

Scott Gunther

Scott Gunther (Mar 30, 2023 16:26 EDT)

Scott Gunther, SVP, Quality & Regulatory Affairs

Date 30-Mar-2023

4.4 Appendices

1	Whistleblowing in France
2	Whistleblowing in Germany
3	Whistleblowing in Belgium
4	Whistleblowing in Italy

5.0 Revision History

Version Number	Version Date	Policy Author	Summary of Change(s) Made
01	July 12, 2021	Yevgenia Kleiner, Asst. General Counsel, Compliance & Litigation	Original
02	March 23, 2023	Bonne Leonard, Manager, Legal & Compliance Yevgenia Kleiner, Asst. General Counsel, Compliance & Litigation	Updated to reflect application of EU Whistleblower Directive and to reflect Catalent's evolving needs and practices.

Whistleblowing in France

Competent Authorities

Name:	French Defender of Rights (Défenseur des Droits)
Type of Concern:	All concerns
Contact information:	https://equineteurope.org/author/france-dr/

The EU also has produced the [EU Sanctions Whistleblower Tool](#) as an external channel allowing for anonymous reporting of sanctions violations. That tool can be found at <https://eusanctions.integrityline.com>.

Whistleblowing in Germany

Competent Authorities

Name:	Für Gelder, Finanzmittel und Finanzhilfen
Type of Concern:	Funds, financing and financial assistance
Contact information:	Deutsche Bundesbank Servicezentrum Finanzsanktionen D-80281 München Tel.: (+49-89) 2889-3800 Fax: (+49-69) 709097-3800 http://www.bundesbank.de/Navigation/DE/Service/Finanzsanktionen/finanzsanktionen.html
Name:	Für Güter, wirtschaftliche Ressourcen, technische Hilfe, Vermittlungsdienste, Dienstleistungen und Investitionen
Type of Concern:	Regarding goods, economic resources, technical assistance, brokering services, services and investments
Contact information:	Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA) Frankfurter Strasse 29-35 D-65760 Eschborn Tel.: (49) 61 96 908 – 0 Fax: (49) 61 96 908 – 800 http://www.ausfuhrkontrolle.info/ausfuhrkontrolle/de/embargos/

EU has produced the [EU Sanctions Whistleblower Tool](#) as an external channel allowing for anonymous reporting of sanctions violations.

Whistleblowing in Belgium

Competent Authorities

Name: Belgian Financial Intelligence Processing Unit (CTIF-CFI)

Type of Concern: Disclosure of suspicious financial transactions

Contact information: 55b1 Avenue de la Toison d'Or
B-1060 Brussels

Tel: + 32 2 533 72 11
Fax: + 32 2 533 72 00
E-mail: info@ctif-cfi.be

EU has produced the [EU Sanctions Whistleblower Tool](#) as an external channel allowing for anonymous reporting of sanctions violations.

Whistleblowing in Italy

Competent Authorities

Name: Ministry of Foreign Affairs and International Cooperation

Type of Concern: National focal point on sanctions.

Contact information: e-mail: dgmo-01@esteri.it

EU has produced the [EU Sanctions Whistleblower Tool](#) as an external channel allowing for anonymous reporting of sanctions violations.

In Italy, under Legislative Decree 231/2001 ("Decree 231"), each Italian entity has a separate independent supervisory body, known as the Vigilance Committee (or "organismo di vigilanza"). For anyone wishing to report a concern to any of Catalent's Vigilance Committees directly, the contact information is as follows:

Catalent Anagni S.r.l. (Anagni Site) Vigilance Committee:

Email: organismo.vigilanza@catalent.com

Mai: Organismo di Vigilanza
c/o Catalent Anagni S.r.l.
Località Fontana del Ceraso snc – S.P. 12 CASILINA N°41
03012 Anagni (FR)

Catalent Aprilia S.p.A (Aprilia Site) Vigilance Committee:

Email: odv@catalent.com
v.gullotta@attitudeconsulting.it

Mail: O.d.V. c/o Catalent Italy S.p.A.,
Via Nettunense km 20,100, 04011, Aprilia (LT);