



Supplier Code of Conduct

Catalent®

Purpose

Catalent's strategic ambition is to power the innovation and growth of the life science industry by becoming its leading development and commercial partner in advanced technologies, first-to-scale innovation, integrated solutions, and new therapeutic modalities. We aim to be the most trusted, reliable, and innovative development and manufacturing partner to the world's pharmaceutical and bio-pharma industries, which includes a commitment to on-time, reliable delivery. We help our life science customers accelerate development, delivery, and supply, efficiently bringing more quality products to market.

Above all, we are driven by our mission to help people around the world live better, healthier lives, putting patients at the center of our work to ensure the safety, reliable supply, and optimal performance of products.

Cultivating a network of ethical, reliable partners and suppliers is critical to our success and that of our customers and the patients they serve. We have an important responsibility not only to comply with all applicable legal requirements, but also to conduct business responsibly and with uncompromising integrity. We conduct business globally and work to ensure that all applicable laws, regulations and standards are followed in our business practices, and are in alignment with our corporate responsibility commitment as well as the Pharmaceutical Supply Chain Initiative Principles in the areas of ethics, people and labor, health, safety and environment, quality and related governance and management systems.

We also expect our suppliers, agents, and other representatives with which we work to follow applicable law and standards of appropriate conduct, as set forth in this Supplier Code of Conduct.

We are committed to doing business with individuals and organizations that operate their businesses with professionalism and integrity. These standards apply to all our suppliers worldwide, regardless of the goods and/or services they supply.

Our goals are to work with suppliers that embrace and comply with the principles of this Supplier Code of Conduct, and to have these suppliers similarly work to obtain compliance with such principles from all the third parties with which they work in the delivery of goods and/or services to us. We will consider a supplier's reputation and record of compliance/non-compliance with these principles in our selection and continued use of such supplier.

Suppliers should ensure this Supplier Code of Conduct is made available to their employees working on our business in the respective native language of such

employees and their supervisors. This Supplier Code of Conduct is available in the following languages: English, French, Spanish, Portuguese, Japanese, Italian, Dutch, Chinese, and German.

Suppliers should maintain appropriate documentation to demonstrate compliance with this Supplier Code of Conduct, or their own comparable (in terms of scope and coverage) Catalent-approved business conduct rules and standards, and must provide us with the means to verify such compliance upon reasonable request.

Policies

ETHICAL CONDUCT

Suppliers shall always conduct their business in accordance with the highest ethical standards. Suppliers that have their own written ethics and compliance standards should review the standards in this Supplier Code of Conduct as well as their own, and immediately advise us of any inconsistency that may create a conflict.

COMPLIANCE WITH APPLICABLE LAWS & REGULATIONS

Each supplier must comply with all applicable laws, rules, regulations, codes, treaties, conventions, and other legal requirements in the country in which it has its principal place of business as well as all those where they conduct business.

Given Catalent's global presence, suppliers must comply with applicable anti-bribery and anti-corruption laws and regulations, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

Suppliers shall not directly or indirectly engage in any form of bribery or provide anything of value to a governmental official in order to:

- win or retain business;
- gain an improper advantage; or
- influence the action or decision of any third party.

Suppliers shall not engage in any type of commercial bribery, kickback or corrupt business activity with any non-governmental third party, including without limitation any Catalent employee, agent, or representative.

ACCURACY OF BUSINESS RECORDS

All financial books and records relating to the business being done with us must conform to the generally accepted accounting principles of the jurisdiction in which the supplier operates.

Records of these transactions must be legible and transparent and reflect actual transactions and payments. Suppliers shall not hide or fail to record a necessary entry or make false entries.

EMPLOYMENT PRACTICES

Suppliers must treat Catalent's employees, their own employees, and anyone with whom they interact on our behalf fairly and with dignity and respect. We do not tolerate intimidation, hostility, harassment, bullying, or any other behavior that might disrupt or interfere with another's ability to work.

We do not tolerate retaliation against individuals who, in good faith, express concerns or report real or perceived violations of law, regulation, company policy or our Supplier Code of Conduct.

Suppliers must comply with all applicable employment laws and regulations, including, without limitation, laws prohibiting discrimination in the workplace.

Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations and provide legally mandated benefits.

Suppliers shall respect the legal rights of employees to join or refrain from joining worker organizations, such as trade unions.

Suppliers shall comply with all applicable laws, rules, regulations, codes, treaties, conventions and other requirements prohibiting forced or indentured labor, inhumane treatment, and any form of child labor or other exploitation of children. Catalent supports legitimate workplace apprenticeships and internship programs that comply with applicable laws and regulations.

Suppliers should proactively educate and monitor their employees to avoid any involvement in such activities.

GIFTS & ENTERTAINMENT

Gifts and entertainment are not needed in order to conduct business with Catalent and are strongly discouraged.

Suppliers shall not offer or give:

- any gift, entertainment or preferred treatment with the intention of trying to influence the decision-making objectivity of our employees;
- any gift, entertainment, or preferred treatment while involved in an ongoing purchasing or contracting decision process (e.g., RFI, RFQ, RFP) or an ongoing contract negotiation;
- any gift of currency or cash-like gift, including "gift cards";
- extravagant recreational outings or travel, or lodging at supplier-sponsored events;

- any gift (including a gift to support charitable causes), entertainment, or preferred treatment solicited by our employees; or
- an opportunity to purchase products, services or a financial interest to any of our employees under terms not generally available to other customers of the supplier.

On a rare and infrequent basis, our employees may accept very modest gifts, entertainment, or other business courtesies if it would be customary and an act of appreciation or gratitude to do so. However, the prior sentence does not apply to those of our employees involved in procurement or responsible for business decision-making.

INTELLECTUAL PROPERTY & CONFIDENTIAL INFORMATION

All suppliers shall execute a Confidentiality and Non-Disclosure Agreement with us as early as possible in the business relationship.

Suppliers shall not share our intellectual property, confidential information, or any other information that they acquire with respect to us or our business (including information developed by suppliers for us and information relating to our products, customers, pricing, costs, know-how, strategies, processes, and practices).

Suppliers shall not use Catalent's name or logo as a reference on suppliers' website, brochures, presentations or publications without Catalent's prior written approval.

Suppliers must immediately report unauthorized use, disclosure, or loss of our confidential information, whether inadvertent or not, to Catalent management and our General Counsel at gencouns@catalent.com, with a copy to our Privacy Group at privacy@catalent.com.

DATA PRIVACY

Suppliers must abide by all applicable data privacy and data security laws and regulations. Suppliers are expected to collect personal information on behalf of Catalent only for legitimate business purposes and only with Catalent's express authorization. Personal information that is within the Supplier's possession shall only be used for the legitimate business purpose for which it was collected, shared only with those authorized to access it, protected in accordance with appropriate security protocols, and retained only for so long as is necessary.

Suppliers must immediately report unauthorized use, including any cyber security breach or disclosure or loss of Catalent-related personal information, whether inadvertent or not, to Catalent management and our Privacy Group at privacy@catalent.com.

CONFLICT OF INTEREST

Suppliers must disclose any apparent or actual conflict of interest to our management. Our management may only waive such conflict in writing.

A conflict of interest arises when personal interests or activities influence, or appear to influence, your ability to act in our best interest. Some situations that could cause a conflict of interest include:

- having a significant financial investment or interest in any company that competes, does business, or seeks to do business with us;
- when employees, officers, or directors of suppliers have family or friends who work for us, another of our suppliers, or one of our customers or competitors.

MOBILE DEVICES, ELECTRONIC MEDIA, INTERNET & EMAIL USE

In those circumstances where a supplier has access to our electronic environment (including, without limitation, email, voicemail, intranet, internet, or software), supplier shall:

- use these tools for our business purposes only; and
- use these tools in compliance with our information technology security policies.

FAIR COMPETITION & ANTITRUST

Suppliers must comply with all applicable fair competition and antitrust laws and regulations.

TRADE COMPLIANCE

Suppliers must comply with all applicable import and export laws, regulations and controls, sanctions, embargoes, supply-chain security requirements (such as C-TPAT) and any other trade compliance laws and regulations of the United States, EU, UK, United Nations and any other country in which activities are conducted. Suppliers may be requested to occasionally participate in audits to demonstrate their commitment to supply-chain security requirements, export embargoes and sanctions, and other trade-related issues.

ENVIRONMENT, HEALTH & SAFETY

Suppliers shall operate in a manner that is respectful and protective of the environment and shall, at a minimum, comply with all applicable laws and regulations regarding health, safety, and the environment.

Suppliers working with us or onsite at one of our locations must work in a way that ensures their own safety and the safety of others, including our employees, and follows applicable Catalent and governmental health, safety, and environmental requirements.

Any environmental, health, or safety incident that affects or may affect us must be reported promptly.

Suppliers shall not possess, use or sell illegal drugs on Catalent's property or perform their work under the influence of alcohol or performance-impairing drugs.

Suppliers shall be requested occasionally to complete or participate in environment, health & safety audits in order to demonstrate compliance with corporate, governmental, and local legislative requirements.

DIVERSITY & INCLUSION

Catalent's sourcing decisions, contract management, and supplier relationships will reflect and promote the principles of diversity and inclusion. Catalent expects suppliers to have a policy in place that ensures that no employee or third party is discriminated against due to their sex, gender, race, ethnicity, disability, religion, or sexual orientation.

A key objective of Catalent is to identify, develop, and utilize certified diverse suppliers (*i.e.*, suppliers that are 51% or more owned and operated by someone who is part of a traditionally marginalized or underrepresented group). It is our expectation that all our suppliers use their best efforts to also procure goods and services from diverse suppliers.

Monitoring & Compliance

Catalent may engage in monitoring activities to confirm supplier's adherence to these standards, including on-site assessments of facilities, use of questionnaires, review of available information, or other measures necessary to review supplier's performance. Catalent may disqualify any potential supplier or terminate any relationship with a current supplier that has failed to meet these standards.

Resources

If you need additional information or guidance on these standards or wish to report a potential violation, contact Catalent's Legal & Compliance Department at +1-732-537-6412 or its Business Conduct Helpline at www.CatalentMSW.com; +1-800-461-9330 (within the U.S.); or +1-800-777-9999 (outside the U.S.).

Conclusion

Strong ethical and social responsibility in the supply chain is very important to us. As an organization, we are continuously looking for ways to improve in this area and encourage all suppliers to do the same and to share their achievements in these areas with us.



Catalent Pharma Solutions, Inc.
14 Schoolhouse Road
Somerset NJ 08873 USA
T + 1 866 720 3148
F + 1 732 537 6480
www.catalent.com