

Supplier Code of Conduct

PURPOSE

Catalent's strategic ambition is to use its broad base of offerings to power the innovation and growth of the life science industry. We seek to expand our position as the preferred strategic partner in core and advanced technologies, integrated solutions, and first-to-scale therapeutic modalities. 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 (PSCI) Principles in the areas of ethics, people and labor, health, safety and environment, quality, and related governance and management systems. Catalent's Ethics and Compliance Program establishes standards for business and professional conduct that are applicable to all company employees and contractors.

We also expect our suppliers, agents, and other representatives with whom we work to follow applicable law and standards of appropriate conduct, which we summarize 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 or services they supply.

We will work with suppliers that embrace and comply with the principles of this Supplier Code of Conduct and expect suppliers to obtain

compliance with such principles from all third parties with which they work in the delivery of goods 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 partnership with each supplier.

Suppliers should ensure this Supplier Code of Conduct is made available to their employees working on our business in the respective native languages of such employees and their supervisors. This Supplier Code of Conduct is available in the following languages: English, French, Spanish, Portuguese, Japanese, Italian, Chinese, and German on Catalent's website.

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.

ETHICAL CONDUCT

Suppliers shall always conduct their business in accordance with the highest ethical standards. Suppliers who 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, at a minimum, comply with all applicable laws, rules, regulations, codes, treaties, conventions, and other legal requirements in the country in which it performs business for us or where such requirements could affect the supplier's ability to perform business for us or its reputation for ethical business behavior.

Given our global presence, suppliers must comply with applicable anti-bribery and anti-corruption laws and regulations, including, but

not limited to, the U.K. Modern Slavery Act, 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 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 contractors, 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.

Suppliers should have a clearly communicated management system that provides workers with a means to report grievances (to the extent permitted by local law, anonymously) and without fear of retaliation.

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, including compensation for overtime at pay rates greater than regular hourly rates. In addition, suppliers are expected to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their families. Where wages do not meet basic needs, suppliers are expected to take appropriate actions that seek to meet a level of compensation that does.

Suppliers will respect the legal rights of employees to join or refrain from joining worker organizations, such as trade unions. Where local regulations restrict trade unions, workers can form workers' committees if they choose to do so, subject to applicable laws and regulations.

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.

CONFLICT MINERALS

Suppliers shall comply with all applicable laws and regulations relating to conflict minerals and responsible sourcing in all countries in which they operate and all countries from which materials are sourced. Suppliers shall maintain reasonable due diligence processes to address associated risks and provide information to demonstrate compliance upon request.

GIFTS & ENTERTAINMENT

Providing gifts or entertainment is not needed to conduct business with Catalent and is 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 or contractors;
- any gift, entertainment, or preferred treatment while involved in an ongoing purchasing or contracting decision process, requests for information, quotation, or proposal, or an ongoing contract negotiation;
- any gift of currency or cash-like gift, including pre-paid 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, this does not apply to those of our employees or contractors 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 the Catalent name or logo as a reference on their websites, brochures, presentations, or publications without our prior written approval.

Suppliers must immediately report unauthorized use, disclosure, or loss of our confidential information, whether inadvertent or not, to our 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, and any related contractual terms. Suppliers are expected to collect personal information on our behalf only for legitimate business purposes and only with our express written 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.

CYBERSECURITY

Suppliers must immediately report unauthorized use, including any cybersecurity breach or disclosure, or loss of Catalent-related personal information, whether inadvertent or not, to our 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.

Suppliers must not interface with our electronic systems without first implementing appropriate cybersecurity safeguards on their own systems.

ARTIFICIAL INTELLIGENCE (AI)

Suppliers who utilize AI technologies while providing goods or services to Catalent must do so in a manner that is ethical, transparent, and compliant with applicable laws, industry standards, and their contractual obligations to Catalent.

FAIR COMPETITION & ANTITRUST

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

TRADE COMPLIANCE & SUPPLY CHAIN SECURITY

Suppliers must comply with all applicable import and export laws, regulations, and controls, sanctions, embargoes, 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 commit to complying with the minimum requirements of Customs-run supply chain security programs such as C-TPAT (Customs Trade Partnership Against Terrorism). Suppliers may be requested to participate in audits to demonstrate their commitment to supply chain security requirements, export embargoes and sanctions, and other trade-related issues.

ENVIRONMENT, HEALTH, SAFETY & SUSTAINABILITY

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 should demonstrate and incorporate sustainability requirements into their supply chain, including life cycle costing and environmental benefits. Suppliers should engage upstream and downstream in their supply chain only with third parties that have appropriate sustainability ratings or are willing to participate in environmental assessments and certification.

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

Suppliers must promptly report to us any environmental, health, or safety incident that affects or may affect us.

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

We may occasionally request suppliers to complete or participate in environment, health, safety & sustainability audits to demonstrate compliance with corporate, governmental, and local legislative requirements.

DIVERSITY

Catalent's sourcing decisions and supplier relationships reflect and promote our commitment to cultivating a supplier base that respects and welcomes a diverse array of backgrounds and experiences. We leverage this diversity to drive innovation and excellence in every aspect of our business. We encourage our supplier base to consider supplier diversity in their sourcing decisions and supplier relationships and expect suppliers to have robust policies in place that assure that no employee or third party is discriminated against due to their sex, gender, race, ethnicity, disability, religion, or sexual orientation.

MONITORING & COMPLIANCE

We may monitor supplier's adherence to these standards, including through on-site assessments of facilities, use of questionnaires, use of third-party vetting and due diligence platforms, review of available information, or other measures necessary to review supplier's performance. We 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 business-related violation, contact our Legal & Compliance Department at ethics@catalent.com (+1-732-537-6412) or our Business Conduct Helpline at www.catalent.speakuptrust.com; +1-800-461-9330 (within the U.S.); or +1-720-514-4400 (outside the U.S.).



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the missions that matter™

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