

## Supplier Code of Conduct

Capsugel is committed to operating its business with the highest standards of corporate responsibility. We operate within a framework of principles, guidelines, and policies aligned with our ethical, social, and environmental responsibilities. We believe that this is critical for protecting, managing, and enhancing our brand and reputation. We also believe this will drive long-term, sustainable growth for Capsugel, our business partners, and the communities in which we operate.

We strive to conduct business with suppliers who share our commitment to operating in a responsible and ethical manner. Capsugel's Supply Chain Code of Conduct outlines Capsugel's principles of responsible supply chain management for ethics, labor, the environment, health and safety, and related management systems ("Principles").

The Principles are applicable throughout the entire supply chain. In some cases, the Principles may require suppliers to go beyond compliance with locally applicable laws and regulations. Suppliers are required to ensure that their employees and all direct or indirect subcontractors and agents acknowledge and adhere to the Principles and expectations specified in the Supply Chain Code of Conduct.

Capsugel expects suppliers to:

- Integrate and apply the Principles in a manner consistent with their own supplier programs;
- Operate in full compliance with all applicable National and International laws, rules, and regulations;
- Be aware of cultural differences and the challenges associated with interpreting and applying these Principles globally; understand the methods for meeting these expectations may vary and must be consistent with the laws, values, and cultural expectations of the different societies of the world;
- Integrate the Principles into a continual improvement approach that advances supplier performance over time.

## Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity.

The Ethics elements include:

### **1. Preventing Bribery & Corruption**

All corruption, bribery, extortion and embezzlement are prohibited. Suppliers do not offer, request or accept bribes or permit sub-contractors or others to do so on their behalf. Suppliers will implement appropriate, ongoing anti-bribery and anti-corruption training.

### **2. Preventing Conflicts of Interest**

Suppliers do not allow personal or family interests to influence their independence or personal judgment. Suppliers have financial controls in place to prevent conflicts of interest affecting procurement and financial decision-making.

### **3. Compliance with Applicable Laws & Customer Requirements**

Suppliers identify and comply with all the applicable national and international laws, regulations, codes and standards, both in the country in which the Supplier works and in the country in which the service or products will be provided.

### **4. Animal Welfare**

Animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

### **5. Communication and Records**

Suppliers shall safeguard and make only proper use of confidential information to ensure that company, worker, and personal privacy rights are protected. Suppliers communicate with integrity and in line with any confidentiality agreements, disclosing information in a timely and appropriate manner and maintain accurate company books and records. Suppliers have appropriate processes to archive and retrieve records that are relevant to investigations or litigations.

### **6. Trade Controls**

Suppliers comply with trade regulations and restrictions of recognized national and international authorities.

### **7. Competition**

Suppliers only seek competitive advantage through lawful means and will conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust and competition laws.

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## Labor

Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect. The Labor elements include

### 1. Freely Chosen Employment

Suppliers shall not use forced, bonded or indentured labor or involuntary prison labor.

### 2. Prohibitions on Child Labor and Young Workers

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in nonhazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

### 3. Non-Discrimination & Fair Treatment

Suppliers shall provide a workplace free of harassment, discrimination and abuse for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not condoned.

### 4. Wages, Benefits and Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

### 5. Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

## Environment, Health & Safety

Suppliers shall comply with all applicable Regulatory requirements regarding the Environment and Health and Safety, and shall operate an Environmental, Health and Safety management system, which underpins and proves compliance with all such Regulatory requirements. Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and demonstrate a culture of continual improvement to further reduce resource consumption.

## Management Systems

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these principles. The Management Systems should be easily retrievable and be to clearly demonstrate compliance with all legal and customer requirements.