



West Pharmaceutical Services, Inc. Statement of Compliance California Transparency in Supply Chains Act

West complies with the California Transparency in Supply Chains Act of 2010 (SB 657), which became effective on January 1, 2012. This law requires large retailers and manufacturers that do business in the state of California and have gross worldwide sales of over \$100 million dollars to be transparent in their efforts to eradicate slavery and human trafficking in their supply chains.

In support of collaborative industry efforts to improve supply chain management, West is a member and an active participant in the Pharmaceutical Supply Chain Initiative (PSCI). PSCI was formed to support pharmaceutical suppliers in efforts to operate in a manner consistent with industry expectations about ethics, labor, health and safety, environment and management systems, including a specific expectation that suppliers shall not use forced, bonded or indentured labor.

As a member of PSCI, West adheres to the [Pharmaceutical Industry Principles for Responsible Supply Chain Management](#) and has been audited successfully by PSCI against these principles. The labor elements in the audits include the following:

- Freely chosen employment
- Child labor and young workers
- Non-discrimination
- Fair treatment
- Wages, benefits and working Hours
- Freedom of association

Further, West has a comprehensive Compliance and Ethics Program that requires all employees to be trained on and holds them accountable to its Code of Business Conduct (Code). The Code requires employees to follow all laws and to act with integrity at all times. All employees must certify annually that they understand and agree to follow the Code. The Code is a public document that also applies to our suppliers. The compliance program also provides avenues for reporting concerns, including a Helpline that is available 24/7 by telephone or on the web from anywhere in the world. Finally, West expects its suppliers to adhere to its Business Partner Code of Conduct, which is modeled after the PSCI Principles for Responsible Supply Chain Management.

- An explanation of PSCI's activities and a list of PSCI members are available at <http://www.pharmaceuticalsupplychain.org/>, including the Implementation Guide to the Principles.
- For more information about our expectations for suppliers, please refer to [West's Code of Business Conduct](#) and its [Business Partner Code of Conduct](#).