



Code of Business Conduct

Edition 3

Approved by the Board of Directors, July 19, 2016

Our Mission

At West, our mission is to partner with our customers from concept to patient, helping them imagine, develop and deliver drug products that improve lives around the world.

Core Values

- West is committed to helping improve the lives of millions of people around the globe.
- We believe our employees drive our success.
- We respect individuals, value teamwork and enable our people to thrive.
- We invite imagination and foster continuous innovation.
- We work as one strong team committed to providing outstanding value to our customers and healthcare partners every step of the way.
- Our customers trust us with their most valuable assets, and we assume that responsibility with the utmost care, producing products of the highest quality.
- We strive to be caring, involved corporate citizens helping to improve lives in the communities in which we live and work.
- We hold ourselves accountable for every action we take and uphold the highest levels of integrity, honesty and ethics.
- Individually and as a Company, we comply with all applicable laws and regulations in countries where we do business.

Visit the Compliance & Ethics Website*
under the Legal and Compliance section of IntraWest.

*West intranet: for employees only



Integrity
ALL DAY...EVERY DAY

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Every West employee
is responsible for ensuring
that our
reputation remains
strong



Integrity
ALL DAY...EVERY DAY

Our Commitment to Integrity

Integrity Helpline: 1-866-814-2685

A Message from the CEO



Dear Colleagues:

Every day West helps to improve the lives of millions of people around the globe. To do so, we hold ourselves to the highest standards of quality, integrity and respect – for our customers and ourselves. Together, we work as one team to provide value to our business partners and to ensure the safe and effective administration of life-saving drugs to patients.

Those values are at the heart of our Company's good reputation and success. They are in the hearts of each and every one of us. Our core values of respect and dignity for the individual, integrity, honesty and accountability enable us to meet the demands of our customers, our industry and each other. The Code of Business Conduct reflects these values and establishes the central principles that govern all West employees.

Our collective integrity depends on the actions of each of us, so please read and make sure you understand the Code of Business Conduct. It is designed to guide you in engaging in personal and professional conduct that reflects the values of the West family. All West employees must uphold these values to help ensure that West continues as a well-respected, ethical and lawful leader in the healthcare industry.

If you have a question or concern about what is proper conduct for you or anyone else, please raise the issue with your manager, the Compliance and Ethics Office, the Law Department or Human Resources.

Every West employee is responsible for ensuring that our reputation remains strong, and for fostering a culture in which compliance with the Code of Conduct and adherence to our core values drives our everyday business activities.

Thank you for taking the time today to review West's Code of Business Conduct. Together, we can maintain our trusted reputation, increase our customer's confidence in our products and services and continue to lead with the integrity and honesty that is expected from West.

Sincerely,

A handwritten signature in black ink, appearing to read "E.M. Green".

Eric M. Green
President and
Chief Executive Officer



Integrity
ALL DAY...EVERY DAY



Our Commitment to Integrity

Our Standards

Your Responsibilities

Your Obligation to Raise Integrity Concerns

How to Raise a Compliance Concern

West's Compliance and Ethics Program

Anti-Retaliation

Confidentiality



Our Commitment to Integrity

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Our Standards

This Code of Business Conduct (“Code”) is a guide to the Company’s compliance structure, applicable laws, and key policies and procedures that govern doing business in a legal and ethical manner in all the markets we serve.

The Code helps to steer relations with peers, managers, subordinates, customers, government agencies, suppliers, business partners and other external parties. It sets the standards for behavior we must meet or exceed every day. It also informs our customers, suppliers, consultants and other interested stakeholders about our Company’s values and what to expect in their relationships with us.

This does not mean that the Code is exhaustive, covers every conceivable situation or contains all the rules that must be followed, especially in countries where the laws may be stricter. All West employees have a continuing obligation to familiarize themselves with applicable laws and Company policies relating to their job responsibilities.

When in doubt, refer to the “Getting Help” section of the Code, which includes a guide for ethical decision making to help with your decision. You are accountable for your conduct, and you can always seek help from your manager, the Compliance and Ethics Office, the Law Department or Human Resources.

A corporation can act only through its officers, directors, employees and others who represent it. Our responsibility, therefore, is to preserve West’s reputation by acting ethically and legally. West counts on you to perform your duties with integrity all day ... every day.

For the complete text of compliance-related corporate policies visit the West Legal and Compliance page on IntraWest.

Q&A

How is compliance with West’s standards enforced?

The Chief Compliance Officer is responsible for enforcement of compliance policies and standards. Any violation of a law or Company policy can result in disciplinary action, including termination of employment.

You are responsible for understanding how West’s policies and procedures apply to you, and to follow them. You should discuss any questions or concerns with your manager or request advice from the Law Department, Human Resources, or Compliance and Ethics Office.

You can find additional information on the Legal and Compliance Intranet site.



Q&A

What are my responsibilities regarding the Standards described in this Code?

West expects that you:

- Gain a basic understanding of the policy requirements summarized in this Code.
- Learn the details of policies and procedures relevant to your job.
- Know, understand and follow the spirit and intent of all applicable laws.
- Complete required compliance and ethics training by the established due dates.
- Continually exercise good judgment as you carry out your responsibilities.
- Seek appropriate help when you are not sure what to do.

We also expect you to raise concerns about possible violations of law or policy with your manager, the Compliance and Ethics Office, the Law Department or Human Resources.

Your Responsibilities

All of us are expected to take ownership of compliance and to act with integrity. West's success depends on your personal commitment to comply with this expectation.

Acting with integrity means delivering on our commitments while adhering to West's Mission and Values, and our Standards. We can do this by:

- taking responsibility and holding each other accountable;
- raising concerns and asking questions;
- making the right decisions even when they are difficult; and
- upholding West's principles in everything we do.



Our Commitment to Integrity

Integrity Helpline: 1-866-814-2685

The Application of Our Compliance and Ethics Standards

West Directors, Officers and Employees

Code of Business Conduct standards apply to all West employees worldwide. The Code also applies to members of the West Board of Directors when carrying out their duties as directors.

Subsidiaries and Controlled Affiliates

Entities in which West owns more than 50 percent of voting rights, or has the right to control the entity, are required to adopt and follow West corporate policies.

Non-Controlled Affiliates

Non-controlled affiliates and entities are encouraged to adopt and follow relevant West corporate policies.

Third Parties Representing West

Third parties such as consultants, agents, sales representatives, distributors and independent contractors must:

- receive information about policy requirements; and
- agree to comply with relevant aspects of West's compliance policies.

We are expected to take action, up to and including terminating a contract, after learning that a third party failed to abide by applicable West corporate policies. If you suspect that a third party has violated any applicable West policies, notify the Law Department or Compliance and Ethics Office immediately.

Waivers

While most requirements in the Code of Business Conduct must be strictly followed, some allow for waivers. All requests for a waiver of a provision of this Code by directors or corporate officers must be approved by the Audit Committee of the Board of Directors in advance and be publicly disclosed as required by law. All other requests must be approved by the requesting employee's manager and the Chief Compliance Officer.

Relevant Policies:

[West-CP-055 Compliance and Ethics Program](#)

[West-CP-056 Code of Business Conduct](#)

Q&A

Where can I find West's corporate policies and procedures?

A list of Code-related corporate policies and procedures can be found in the Corporate Policies Index of this Code. You may view and print a copy of the policies and procedures by visiting the Legal and Compliance Intranet site.

You are responsible for understanding how West's policies and procedures apply to you and to follow them. You should discuss any questions or concerns with your manager or request advice from the Law Department or Compliance and Ethics Office.

What should I do if the country, state or other local law where I live is more restrictive than or conflicts with the Code or West policy?

The Code and global policies reflect a blend of U.S. legal requirements and those of other countries in which West operates. If your local laws are more restrictive than the Code provisions or global company policies, you must conduct your activities according to the more restrictive local requirements.

Contact the Law Department or Compliance and Ethics Office for advice in situations where there appears to be a direct conflict between requirements of the Code and local law, or between laws of different countries that may apply to the same situation.

Q&A

Is the Company encouraging employees to report on one another?

Our goal is to promote and maintain a workplace where our Values and Standards are upheld. At times, it may be appropriate to approach a co-worker directly with your concerns, and provide an opportunity to clarify his or her behavior. In the event that employees are uncomfortable handling the situation on their own, they are encouraged to consult their managers, or discuss their concerns through any of the channels listed in this Code.

Your Obligation to Raise Integrity Concerns

We are responsible for acting with integrity at all times. We are also responsible for raising concerns about risks to the Company.

If you reasonably believe that a co-worker has violated or may violate a law or West policy, you have a duty to report that information immediately to your manager, another manager, Human Resources or the Compliance and Ethics Office. West has anti-retaliation and confidentiality policies to protect employees. No employee who reports a violation or suspected violation of this Code or applicable law will be penalized in any manner for providing the information.

All employees can contribute to West's culture of compliance by understanding West's policies, embracing West's commitment to integrity and acting to enforce compliance and avoid violations.

Non-compliance can have severe consequences for West, its customers, investors and employees. By raising concerns, you give management the chance to address potential problems and protect the Company before they become serious.

Why is it important to make a report?

The Company needs to know about your concerns so that potential compliance or ethical issues may be investigated and addressed quickly and appropriately. When you make a report, you help yourself, your peers and the Company.

Relevant Policies:

[West-CP-057 Compliance Reporting, Confidentiality and Non-Retaliation](#)

Raise Your Concerns

- Promptly raise any concerns about potential violations of any West policy or this Code.
- Understand the different channels for raising integrity concerns: a manager, a West attorney or other compliance resource listed in this Code.
- If a concern you raise is not resolved, pursue the issue! Raise it through another of West's channels.

Our Commitment to Integrity

Integrity Helpline: 1-866-814-2685

How to Raise a Compliance Concern

Raising an integrity concern protects our Company, our colleagues and our stakeholders. West offers several methods for raising concerns, including your manager, Human Resources, the Compliance and Ethics Office and the Integrity Helpline. Use the method that is most comfortable for you.

Ways to Address Issues

Most issues can be resolved locally before they become problems for West colleagues, the Company or the public. We encourage you to raise concerns and ask questions—especially those of a legal or ethical nature, but also those relating to quality of work and working environment. All managers are responsible for being accessible to colleagues who may want to reach out to them.

While we hope that you feel comfortable discussing any issue with your manager, there may be times when you prefer to use another avenue for addressing issues. In these cases, you may speak with others, including:

- the next higher level of supervision;
- your operating unit head;
- any manager;
- Human Resources;
- the Compliance and Ethics Office; or
- the Integrity Helpline.

Human Resources

Human Resources personnel are available to listen to any concerns you may have. You may reach out to your local Human Resources representative or the Corporate Human Resources Group.

You can raise
a concern verbally
or in writing.
If you prefer,
you can do it
anonymously.



Q&A

West Integrity Helpline:

Web reporting:

<http://www.west-helpline.com>

<http://www.west-euhelpine.com>

Phone:

1-866-814-2685

Can I call the Integrity Helpline if I am located in Europe?

European privacy laws limit the anonymous use of the Integrity Helpline to finance, auditing, accounting, banking, fraud and anti-bribery matters. European employees are asked to contact senior management in their business or their local Human Resources representative regarding human resource-related or other concerns.

The Integrity Helpline

The Integrity Helpline phone and web-reporting tools can provide access to corporate resources for addressing concerns that might not be adequately resolved locally. They also can provide a way to report a concern or get information or advice anonymously. Any information reported through the Integrity Helpline is received by West's Compliance and Ethics Office, which will take appropriate action. The Helpline gives you the option to receive information about the Company's response to your concern.

The Integrity Helpline is available by phone and web-reporting tool 24 hours a day, 7 days a week, 365 days a year, and is operated by specially trained third-party representatives. Local privacy laws may affect availability and terms of use. For example, in some countries the Integrity Helpline can only be used to report serious concerns involving senior management. In some countries, the Integrity Helpline cannot be used to communicate anonymous allegations. Your Human Resource team and Compliance and Ethics Office can provide more information.

The Compliance and Ethics Office

You can contact the Compliance and Ethics Office directly to report a concern or ask a question through a variety of channels:

- by e-mail – integrity@westpharma.com
- by mail – 530 Herman O. West Drive, Exton, PA 19341 USA
- by phone – 1-610-594-3319
- in person – 530 Herman O. West Drive, Exton, PA USA

Relevant Policy:

[West-CP-057 Compliance Reporting, Confidentiality and Non-Retaliation](#)

West's Compliance and Ethics Program

West's compliance and ethics program is designed to support legal and ethical conduct throughout the Company.

The **Chief Compliance Officer** is responsible for overseeing West's compliance program, including implementing Code of Business Conduct training; developing and conducting training on key areas of legal risk; providing channels for employees, suppliers and customers to report suspected legal and ethics violations; and reporting compliance and ethics activities and issues to the Company's senior Management and Audit Committee.

The **Compliance and Ethics Office** within the Law Department works with the Chief Compliance Officer to ensure adherence to laws, regulations and Company policies and procedures on a day-to-day basis.

West's tiered compliance structure promotes leadership oversight and enhancement of a compliance culture through the **Executive Compliance Oversight Committee** and **Regional Compliance Advisory Committees** throughout the organization.

Additional compliance support is provided by groups and individuals throughout the Company in areas such as legal, safety and health, regulatory, corporate audit, human resources, finance and other functions.

The Compliance and Ethics Office has exclusive responsibility for investigating, or directing the investigation of, significant potential, suspected or actual violations of law or policy. The Compliance and Ethics Office may request the assistance of appropriate West personnel in conducting the investigation. West's Board of Directors is regularly briefed on ethics complaints and activities.

Relevant Policies:
[West-CP-055 Compliance and Ethics Program](#)

Q&A

What happens when I make a report?

The Company investigates all reports of noncompliance and takes corrective action when necessary. Corrective actions may include revision of a policy or procedure, clarification of training and/or disciplinary action against an employee.

Can I expect a response if I make a report?

Yes. The goal of the Compliance and Ethics Office is to respond promptly to all questions and reported concerns. If your concern requires investigation, the Compliance and Ethics Office will conduct or direct the investigation and, where possible and appropriate, provide status updates. However, because of confidentiality concerns, detailed information about matters will be shared only with those who "need to know."



Q&A

If I report a concern, will I get in trouble if my concern turns out to be wrong?

You will not be reprimanded or subject to discipline as long as you honestly have a concern. As an employee of West, you have a responsibility to report a violation of the Code and you may be subject to discipline if you witness something but do not report it.

Anti-Retaliation

West strictly prohibits retaliation against any West colleague who in good faith raises a concern or reports misconduct. No director, officer or employee who in good faith reports a violation will be subject to harassment, retaliation or adverse employment consequence—even if it later turns out that the employee was mistaken in reporting the matter originally. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

All West managers and supervisors are required to take appropriate measures to prevent retaliation in their areas of responsibility.

If you believe that you, or someone else, has been retaliated against for raising a good faith concern, you should contact the Compliance and Ethics Office or the Human Resources team immediately. You may also call the Integrity Helpline or use the Integrity Helpline web-reporting tool where it is available and permitted by law.



Confidentiality

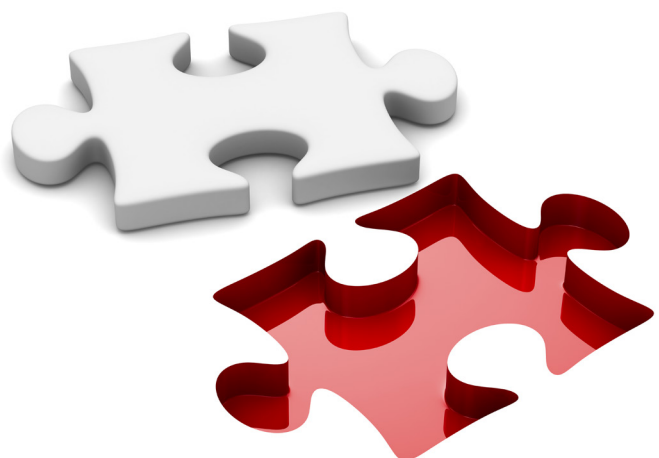
Maintaining the confidentiality of those who participate in West's compliance program is an essential part of a successful reporting system. Every effort will be made to protect your identity whenever you interact with any element of the compliance program. In some cases, we cannot guarantee anonymity because of the nature of the investigation, the requirements of conducting a thorough investigation, or legal requirements. Where available and permitted by law, employees concerned about confidentiality may consider placing an anonymous report to the Integrity Helpline.

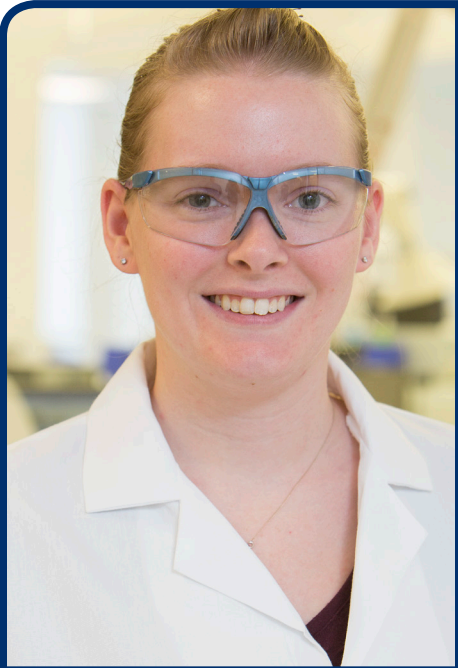
Relevant Policy:

[West-CP-057 Compliance Reporting, Confidentiality and Non-Retaliation](#)

West's Non-Retaliation Policy

No employee who reports a breach or suspected breach of this Code, in good faith, will be penalized in any manner for providing such information regardless of the means used to report the breach. Anyone who violates this non-retaliation policy, regardless of his or her position, will be subject to discipline, which could include termination of employment.





Our Employees

Diversity and Equal Opportunity

Health and Safety

Workplace Harassment

Workplace Violence

Substance Abuse in the Workplace



Diversity and Equal Opportunity

At West, we recognize and value the spectrum of people who make up our Company. It is a key to our success.

We encourage a culture of mutual respect in which everyone understands and values the similarities and differences among our employees, customers, communities and other stakeholders.

West is committed to providing equal employment opportunities to all employees and applicants, without regard to a person's race, color, religion, age, sex, creed, national origin, ancestry, marital status, sexual orientation, disability, military eligibility or veteran status.

Harassment and Discrimination

Harassment and discrimination in any form is not acceptable and will not be tolerated in the conduct of our business, whether in West facilities or outside West facilities while on Company business.

Q&A

Isn't Diversity and Equal Opportunity just a U.S. initiative?

No. Diversity and Equal Opportunity is a global business strategy. We conduct business with customers worldwide and employ colleagues representing many different backgrounds, languages and customs. Acknowledging and respecting our differences drives cultural competence, which is an essential component of our future success.

My co-worker tells racially charged jokes. He thinks they're funny, but the jokes make me feel uncomfortable. What should I do?

Your co-worker should be made aware that his jokes are creating a negative work environment. You are encouraged to do this yourself if you feel comfortable doing so.

Whether you communicate directly with the co-worker or not, you should report this to your manager, who will be expected to take the appropriate corrective action. You may also contact your Human Resources representative or the Compliance and Ethics Office.



Q&A

How is compliance with West's Standards enforced?

Sometimes I feel a mild pain in my back after a shift, but the pain goes away by the next day. Do I really need to report this?

Yes. Reporting even minor accidents is important for two reasons. The first is to ensure that an injury or illness can be treated promptly and properly. The second is to identify unsafe practices and facility conditions so corrective action can be taken.

A co-worker made degrading remarks about other employees. Some of my co-workers have complained about this person. How can we make this behavior stop?

Consider talking to the co-worker to let the person know the remarks are contrary to our culture of mutual respect. If the situation does not improve, you should contact your manager, Human Resources or the Integrity Helpline.

Health and Safety

West is committed to providing work facilities that are safe and healthful for employees, guests, business contacts and the community. Maintaining a safe and healthy work environment relies heavily on the choices and behaviors of individuals. Each of us must be aware of the rules and procedures that apply to our workplace, follow all applicable occupational safety and health laws, and encourage others to do the same.

In addition, every employee should remain aware of risks in the workplace and should make efforts to reduce those risks when they might pose a threat to someone's safety.

Immediately report any unsafe conditions or acts to your manager, Human Resources or site safety coordinator.

Workplace Harassment

We strive to build and maintain a workplace of mutual respect that is free of harassment and discrimination. Harassment and discrimination in any form is not acceptable and will not be tolerated in the conduct of our business, whether in West facilities or outside West facilities while on Company business.

It is never acceptable to make statements or engage in conduct that is degrading, humiliating or intimidating. Even small, apparently innocent remarks or actions can create an environment that may be offensive to others.

Sexual Harassment

Sexual harassment is one type of harassment and violates West policy. It can include unwelcome sexual advances, requests for sexual favors, unwelcome flirtations, or other unwanted verbal or physical contact of a sexual nature. Examples of prohibited behavior may include suggestive or lewd remarks, and unwanted hugs, touches or kisses. It can also include graphic or visual displays such as posters, electronic pictures, video clips or e-mail messages.

Relevant Policy:
West-CP-002 Safety and Health

Workplace Violence

West is devoted to maintaining a work environment free from violence, threats of violence, intimidation or other disruptive behavior. West will not tolerate acts or threats of violence, including verbal or physical threats, intimidation, harassment or coercion. Individuals who commit such acts may be removed from the premises and may be subject to disciplinary action (up to and including termination), criminal penalties or both. We need your cooperation to maintain a safe working environment. Do not ignore violent, threatening, harassing, intimidating or other disruptive behavior.

Behavior that threatens the safety of people or property, or has the potential to become violent, should be immediately reported to your manager, security, Human Resources or the Integrity Helpline.

Relevant Policy:
West-CP-002 Safety and Health

Q&A

I overheard a co-worker threaten another employee, who is afraid to report the incident. What should I do?

Report the incident immediately. West will not tolerate acts or threats of violence and will investigate all reports. You have a responsibility to act when you know of a threat or risk to any of our people.



Q&A

I worry that one of my co-workers may be under the influence of alcohol or drinking on the job. I'm afraid to confront her. What should I do?

If your co-worker has an alcohol problem, she could be compromising her safety and that of other workers, as well as her ability to perform on the job. If you feel that you have observed sufficient evidence that indicates your co-worker may be under the influence of alcohol at work, you should speak to your manager, contact Human Resources or the Compliance and Ethics Office. The appropriate professionals will assess how best to address the situation.

Substance Abuse in the Workplace

Use of alcohol or certain drugs impairs productivity and poses a safety threat to everyone. Alcohol and drugs, other than drugs prescribed by a physician, should not be used during working hours. During working hours, employees should not use medically prescribed drugs that could create a threat to safety. The possession, sale or use of illegal drugs or drug paraphernalia on West premises, or while conducting West business off Company premises, is prohibited.

An employee who reports to work under the influence of— or is unfit to work because of—the effects of alcohol or drugs is subject to disciplinary action, up to and including termination from employment consistent with the requirements of local law.

West reserves the right to search items on Company property, including offices, desks, computers, cars and lockers at any time, to the full extent permitted by local law.

Relevant Policy:
[West-CP-002 Safety and Health](#)



Integrity
All Day...Every Day
Living a culture of
Compliance





Our Company

Protection of Personal Information

Accurate Company Records

Records Management

Protecting Company Information

Insider Trading

Communications with the Public

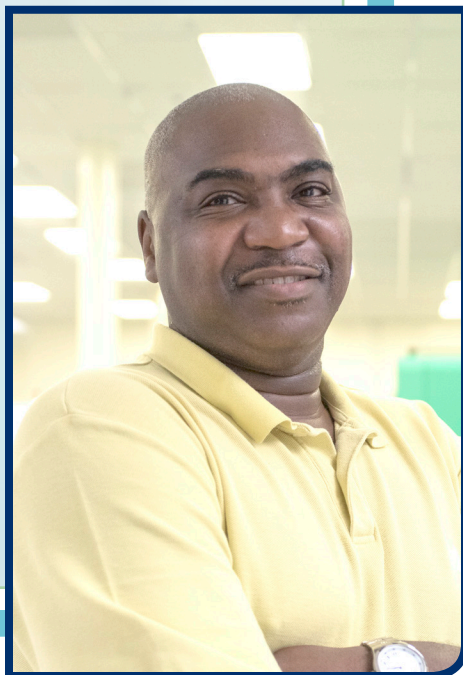
Conflicts of Interest

Corporate Opportunities

Entertainment and Hospitality

Use of Corporate Assets

Use of Social Media



Protection of Personal Information

West respects and protects the privacy of our employees, business partners and other third parties, and is committed to the ethical management of personal information in its possession. Generally, the collection, use and transmission of and access to personal information are limited to legitimate business purposes and consent must be obtained as required by applicable law.

Personal data must be secured to prevent unauthorized disclosures. We maintain administrative, technical and physical safeguards designed to protect this information from accidental, unlawful or unauthorized access, alteration or use. Any employee who handles personally identifiable information, including employment, payroll, medical or benefits information, must do so appropriately, in compliance with applicable privacy and data protection laws and contractual obligations.

We may monitor your personal communications for business reasons, to properly review the use of corporate assets, correct technical issues, investigate possible wrongdoing and ensure compliance with applicable laws. Any monitoring will be conducted in compliance with our internet and e-mail usage policies, and to the extent permitted by applicable law.

If you believe data is being misused or is inadequately protected, please contact the Law Department or the Integrity Helpline.

[Relevant Policy:](#)

[West-CP-061 Data Privacy and Employee Personal Information](#)

Q&A

[May I send West employee data to my personal email account so that I can work from home on my personal computer?](#)

No. You may bring your West-assigned laptop home and use the employee Virtual Private Network (VPN) to access the data if required to perform your job duties.

[Are there specific countries that require employee data to be protected?](#)

Yes. Most European countries including Germany and France have privacy laws that require personal data to be protected when stored or transmitted. One way to protect data is with encryption, but other methods are also acceptable.



Q&A

I know the Company will receive a rebate check from a customer for meeting volume requirements. Our business unit is exceeding our budget in the current year. Is it acceptable to ask the customer to delay sending the check until next year to cover unforeseen contingencies in next year's budget?

No. Income and expenses must be recorded in the period they are earned or incurred, regardless of when budgeted. You may not agree to delay making or receiving a payment due to, or from, a customer. Doing so could be fraudulent and could subject you and the Company to liability.

One of my direct reports recently returned from a business trip. In reviewing her expense report, I noticed a small discrepancy between a receipt she submitted and the amount entered on her expense report. Should I ignore it?

No. The size of the discrepancy doesn't matter when submitting expense reports. You should address the discrepancy with the employee.

I have a tight deadline to complete analytical testing. I think I know the outcome, so is it permissible to complete the report without finishing the testing?

No. You must complete and document accurately all relevant testing and analysis. Falsification of data violates the Code and will lead to disciplinary action, which may include possible termination of employment. It can also damage West's reputation and may lead to liability for you and the Company.

Accurate Company Records

Accurate Company records are essential to the management of the Company and to maintaining and preserving investor confidence. They also help the Company fulfill its obligation to provide full, accurate and timely financial and other disclosures to the public. All of West's books, records and accounts must fully and accurately reflect the true nature of its business transactions. These include financial statements as well as time sheets, expense reports, bills, invoices, payroll and benefits records, and other essential Company data.

Every West employee involved in making accounting entries or in keeping other records that affect accounting entries must make sure those entries are correct and complete. No employee may improperly alter, destroy, conceal or falsify records or documents. Compliance with the Company's system of internal accounting and financial controls, and disclosure controls is required at all times.

Reporting Concerns

Any individual who has concerns or complaints regarding the accuracy of financial, R&D, manufacturing, regulatory, analytical, engineering, intellectual property or any other Company record is expected to raise his/her concerns to appropriate Company resources.

Any West employee, officer or director who has concerns about questionable accounting, auditing or other financial records is expected to report those concerns to the Audit Committee of the Board of Directors, the Chief Compliance Officer or the Integrity Helpline.

Relevant Policies:

[West-CP-001 Delegation of Authority](#)

[West-CP-012 Internal Control over Financial Reporting](#)

[West-CP-022 Travel and Employee Expense Reimbursement](#)

Records Management

Company records are critically important to the lawful and efficient operation of West. They include written documents and electronic documents such as e-mails or other data, created as part of the conduct of West's business. All Company records are West's corporate assets. These records may be subject to many legal or regulatory requirements. Therefore, records must be maintained according to West's Record Retention policy.

We generate records every day. The improper retention or destruction of these records can damage West, our customers or lead to significant legal liability. Therefore, each employee is responsible for properly classifying records according to West policies. Additionally, you are responsible for retaining and protecting Company records that are under your control. It is also crucial to ensure that records that are no longer required to be maintained are destroyed consistent with West policies.

The Law Department may issue a Records Retention Hold Notice (Legal Holds), which requires that records that would otherwise be destroyed are saved. Legal Holds make certain that records that are the subject of a governmental investigation, audit or litigation are not destroyed. If you believe that a record may be or become related to an investigation, audit or litigation, you must not destroy the record and you should contact the Law Department.

Relevant Policy:
[West-CP-060 Record Retention](#)

Key Term: Company Record

Company records are any recorded information created, received or obtained by any Company personnel while acting within the course and scope of their employment pertaining to Company business or operations. These records may be physical or electronic. Examples may include paper documents (including handwritten notes), audio or video recordings, and computer-based information such as e-mail and computer files.

Q&A

It has been several years since my department re-viewed the contents of its file cabinets. We scheduled a records "clean-up day" and want to be sure we know what we can throw away. Where can I find this information?

According to our Record Retention Policy, you must check the Record Retention Schedules for Company retention requirements of different types of Company records.

In addition, you should find out if there are any Legal Holds that prohibit you from disposing of certain records. A listing of Legal Holds may be viewed on the Legal and Compliance IntraWest site. If you need further guidance about whether a particular record must be retained, you should contact the Law Department.



Q&A

On a recent business trip, I overheard several of my West co-workers in the elevator discussing an important new product development initiative. What is my responsibility in this situation?

You should speak with them about the issue immediately. Each West colleague is responsible for protecting our Company's confidential information.

To help me do a better job at West, I kept several documents that I used at my previous employer describing various processes they used. Can I use them at West?

If the documents contain confidential or proprietary information of your former employer, you cannot use or share this with West. West expects all employees to honor any nondisclosure agreements on the confidential information they have obtained at previous jobs. If you are unsure, talk to a member of the Law Department before using or sharing the information.

Protecting Company Information

To maintain our competitive advantage, you must safeguard the Company's proprietary and confidential information in the same way that all other important Company assets are protected. Confidential information includes information concerning pricing, products and services under development, and any other non-public information that might be of use to competitors, or that could be harmful to West or its customers if disclosed. Further, confidential information should not be used for any purpose except to benefit West's business, and it should only be provided to those employees within West who have a need to know such information.

West respects the intellectual property, trade secrets and proprietary information of others. Every employee has a duty to maintain the confidentiality of a third party's trade secrets and proprietary information, including those of a former employer, and no employee should ever knowingly infringe on the rights of others. Confidentiality also requires that you not discuss confidential information about customers with anyone other than another West employee who has a proper business need to know this information.

You should treat all computer data as confidential, and you should protect it from use by any unauthorized person.

Relevant Policies:

[West-CP-047 Protection of Trade Secrets and Confidential Information](#)

[West-CP-052 Scientific Publications and Presentations](#)

[West-CP-072 Information Security General Policy & Procedure](#)

[West-CP-074 Social Media Policy](#)



Insider Trading

You may not buy or sell West's stocks, bonds, options or other securities while aware of "inside information"—material nonpublic information—relating to West. You also are prohibited from providing that information to someone else, including spouses, relatives and friends, who might use it to buy or sell West securities.

Anyone with inside information about companies with which we do business or may do business also may not buy or sell the securities of those companies or pass the information to someone else who might use it to buy or sell the securities of that company.

Even the appearance of an improper transaction must be avoided to preserve the Company's reputation for adhering to the highest standards of conduct. When in doubt, contact the Law Department before making any securities purchases or sales.

Relevant Policy:
[West-CP-046 Securities Trading Policy](#)

Key Term: Material Nonpublic Information

"Material nonpublic information" is any information that an investor might consider important in making a decision on whether to buy, sell or hold a security that has not yet been widely disseminated to the public with sufficient time for the financial market to become aware of it. Examples include financial results or forecasts; significant gains or losses of business; dividend changes; possible mergers and acquisitions; new product innovations; major litigation developments; and major changes in business strategy.

Q&A

A number of my shares of restricted stock have just vested, and I would like to sell them, but I'm working on an important confidential licensing project. Can I sell my shares?

If you are working on a confidential matter, such as a transaction, that is material to the Company, you cannot sell your stock before the transaction is publicly announced because you are in possession of material nonpublic information. You should contact the Law Department to discuss what restrictions may apply to you.

If you are unsure whether information is material nonpublic information, contact the Law Department for advice.



Q&A

A reporter contacted me to find out more about a recent expansion of our plant. May I talk to him?

All media requests for Company-related business or financial information should be passed on to Corporate Communications 610-594-3035 or the Corporate Investor Relations Office at 610-594-3318.

Only a limited number of senior officers are authorized to speak on behalf of West to security analysts, shareholders and certain other types of persons.

Communications with the Public

West employees regularly communicate with customers, regulators and other Public Officials, analysts, investors, the press and other important external audiences. To ensure that we communicate in a thoughtful and appropriate manner, it is critical to work with Corporate Communications, Investor Relations and the Law Department as follows:

- All external publications (including speeches, articles, reports, seminars, presentations and other similar materials) must be reviewed and approved in advance by Corporate Communications.
- Any inquiries or requests from the press, media, financial community or the public regarding business or financial information about West must be referred to the Investor Relations.
- All inquiries about a pending legal matter or other sensitive issue should be referred to the Law Department (except if the inquiry is from the media, in which case it should be referred to Investor Relations).
- All uses of the West Pharmaceutical Services name outside of the Company must be approved in advance by Corporate Communications.
- All requests by third parties to use the “corporate signature” or “diamond” logo in the distinctive West font and shade of blue must be approved in advance by Corporate Communications.
- All general inquiries about the Company, its business or its employees must be referred to Corporate Communications. Only certain designated persons are permitted to disclose information on these topics to third parties.

Relevant Policies:

[West-CP-048 Fair Disclosure of Company Information](#)

[West-CP-052 Scientific Publications and Presentations](#)

[West-CP-053 Trademark Policy and Administrative Procedure](#)

Conflicts of Interest

Our products, our jobs and the value we produce for our shareholders depend on putting West's interests first when we conduct business. Periodically, you may face situations in which your loyalties as an employee are divided between personal interests that are, to some degree, incompatible with the interests of West. This is known as a conflict of interest. Employees must avoid all actual or apparent conflicts of interest. You are required to discuss any conflict of interest or even the appearance of a conflict of interest with your manager immediately upon becoming aware of it.

Outside Activities and Investments

Employees may not compete with West. You may not accept employment outside West or conduct your own business if either of these activities represents a potential conflict of interest, without first receiving approval from your manager. Any approved outside employment can never be with a competitor, customer or major supplier, and it cannot involve working during the employee's regular business hours for anyone other than West. No officer of West may serve as an officer or director of any entity not affiliated with West without the prior approval of West's Chief Executive Officer.

You must not take any action in the course of your employment with the Company that may appear to be affected by a personal interest, or by your position as an owner, stockholder, officer, director, employee or agent of another organization that is a West customer, supplier or competitor. You must not participate in any business dealing that would allow you to profit, directly or indirectly, because of your status as an agent, owner, shareholder, officer, director or employee of another organization that is a West customer, supplier or competitor.

Relevant Policy:
West-CP-079 Conflicts of Interest

Q&A

A close friend recently took a job with a West supplier. Does our friendship create a conflict of interest?

It could if your position requires you to participate in the negotiations of contracts with your friend's employer or if you are involved in the decision to continue use of this company as a supplier. In this case, you should disclose this relationship to your manager and not participate in these supplier decisions or negotiations.

My father is CEO of a consulting firm that has submitted a bid to provide regulatory consulting services for West. Could there be a conflict of interest?

Yes, there could be a problem. Family and household members who work for a customer, distributor, competitor or supplier of West pose a potential for conflict of interest. In this case, there may be a conflict of interest depending on your position at West and your influence on a decision to engage your father's consulting firm. You should disclose the situation to your manager, the Law Department or the Compliance and Ethics Office, with a request for an exception.

Q&A

In my country, refusing a gift from a business associate could be considered an insult. What should I do when a gift exceeding the value allowed by West's policy is offered?

Consult your manager or a member of the Law Department or Compliance and Ethics Office. If the gift must be accepted to preserve the business relationship or is impractical to return, it may be possible to accept it as Company property or donate it to charity. For example, food items could be placed in a central location for everyone to share, or a painting could be donated to a local museum.

West will not pay for, reimburse or fund in any way gifts or entertainment that do not comply with this Code and other applicable policies.

Corporate Opportunities

Any business opportunities that you see as a result of working on West's behalf must be used for the Company's benefit. At West, you may not take for yourself or for your personal gain opportunities that you discover or learn about through the use of corporate property, information or position or use the Company's property, information or position for personal gain.

These prohibitions also apply to using Company opportunities, property, information or position for the personal benefit of family members, friends or organizations outside of West.

Loans

Loans to, or guarantees of obligations of, employees or their family members are of special concern and are absolutely prohibited in the case of directors and executive officers and their families. Employees and their immediate relatives must not lend money to, guarantee debts of, or borrow money from, a current or potential competitor, supplier or customer of the Company.

Gifts, Entertainment and Hospitality

West prohibits you and your immediate family from giving and accepting gifts, services, perks, entertainment, discounts, loans or other items of more than modest value by local standards, to or from those who are doing business or seeking business with the Company. Items of modest value are permitted only if they are directly related to the promotion, demonstration or explanation of West's products and services, and not given or received on a frequent or regular basis.

Gifts

You must not accept or provide a gift unless it is:

- of nominal value;
- not intended and could not be perceived by others to improperly influence business decisions; and
- consistent with customary business practices, all applicable laws and all Company policies and procedures.

You may only give something of value to a Public Official after you have received written approval from the Compliance and Ethics Office pursuant to the requirements of the Business Gifts, Entertainment and Hospitality Policy and Procedures (CP-062).

Entertainment and Hospitality

When permitted by applicable law, you may provide entertainment for the purpose of developing business relationships, such as modest meals or event tickets. However, you may accept or provide a meal or entertainment only if it:

- accompanies authentic and essential business or education discussions;
- is not intended and could not be perceived by others to improperly influence business decisions;
- is consistent with all applicable laws, customary business practices, and our Company policies and procedures;
- is not lavish or extravagant in price or quantity; and
- would not embarrass the Company if it was brought to public attention.

Doing Business with Public Officials

Specific laws apply to interactions with Public Officials and employees. These laws are quite complex and vary from country to country. For example, the U.S. and other countries have strict laws that prevent providing anything of value, including food or beverages, to a government employee. When doing business with government agents, employees or officials, be sure you understand applicable laws, as well as local customs and practice. Before offering or accepting any gifts, gratuities, entertainment or hospitality in any form to or from a public employee, you must consult the Compliance and Ethics Office.

Relevant Policies:

[West-CP-019 Purchasing](#)

[West-CP-045 Anti-Corruption Policy and Procedures](#)

[West-CP-062 Business Gifts, Entertainment and Hospitality Policy and Procedures](#)

Q&A

A vendor with which West has a business relationship invites me to lunch at least twice a month. Is this okay?

Probably not. Accepting lunch invitations is okay if you are meeting for a business purpose, but frequent or extravagant meals can appear to create a conflict of interest. Consult your manager if a vendor constantly invites you to lunch. Tell the vendor about the Code and keep lunch meetings with vendors to a reasonable limit with a business purpose.

A potential supplier has invited me to attend a regular season professional sporting event with him. May I attend?

You must consider whether or not accepting the invitation might be perceived as improperly influencing business decisions. If accepting the invitation will not influence you, it may be acceptable to attend. However, if the tickets are expensive or difficult to obtain, the value of the entertainment may be considered excessive and you should not attend.

Key Term: Public Official

The FCPA defines a “Public Official” as anyone employed by any government or government-controlled commercial enterprise, candidate for public office, political party or party official.

Q&A

Is it permissible for me to do Internet banking on a Company computer?

Yes, so long as the use is limited and not for profit. West does not assume any liability or guarantee the security of the transaction.

May I use the copier to make flyers for a local charity's fund-raising event?

No. You may not, unless this is a charitable activity that has been approved in advance by the Company. Speak to your manager or a Human Resources representative if you have a question.



Use of Corporate Assets

Company Property and Facilities

All employees are responsible for the proper use of West's property and facilities. Company property includes tangible property, such as computers, printers, manufacturing equipment, office supplies and inventories; and intangible property, such as trademarks, formulas, patents, copyrights and other intellectual property. Unless otherwise prohibited by an employee's manager, reasonable minimal personal use of a Company telephone, computer or other equipment is permitted.

Subject to local law, scientific discoveries, formulas, computer codes and programs, publications, manufacturing processes and other intellectual property created as a result of work at West automatically becomes West's property. None of us can use this property for personal enrichment or for personal or family business purposes.

Company property, facilities or physical resources should not be used for solicitation or other activities that are not related to the employee's services to the Company, except for charitable activities that have been approved in advance by the Company.

Any employee found to be engaging in, or attempting, theft of any Company property, including documents, equipment or intellectual property, or personal property of other employees, will be subject to discipline up to and including immediate dismissal and possible criminal proceedings. All employees have a responsibility to report any theft or attempted theft to the Company's management.

Information Systems and Data

Company assets include computers, software and computerized information. Employees must use these assets appropriately, consistent with Company policy, and protect them from loss, theft, damage, misuse or abuse.

Company assets are provided for you to use for West's business. Employees may occasionally make limited use of a Company computer system, including Internet and e-mail, for personal reasons. But personal use must not be extensive and must not interfere with business activities. Company systems may not be used for any activities that are prohibited by other Company policies and may not be used to support an outside business or for financial gain such as for working on outside employment.

Relevant Policies:

[West-CP-051 Patent Policy and Administrative Procedure](#)

[West-CP-063 Acceptable Use of the Internet Services](#)

[West-CP-064 Acceptable Use of Electronic Messaging](#)

Use of Social Media

West recognizes the opportunities for communication and collaboration created by the use of social media. We want to maximize those opportunities while minimizing the risks and challenges they also represent. Social media includes blogs, social networks like Facebook and LinkedIn, wikis and video and photo-sharing sites such as YouTube and Flickr, among others.

Only certain persons have been authorized to use social media outlets on behalf of the Company. While we recognize the rights of West employees to participate in social media, you must comply with all applicable laws, regulations and Company policies. You should adhere to the following guidelines:

Use Caution and Common Sense. Customers, competitors and fellow employees may have access to what you consider to be “personal” posts. Readers may also be aware of your affiliation with West, even if you do not mention it. So please use caution and common sense even when discussing Company issues on what you believe to be a personal basis. Remember, too, that you should never discuss issues that involve the Company’s confidential information.

Be Open and Honest. Be open and honest about your affiliation with West when it is relevant to the issue. Disclose your West employment status, and make it clear that your ideas or opinions are personal and may not represent the position of West on the issue.

West Values Apply. Always remember that our Values and Standards apply to our online activities, including our responsibility to protect Company confidential information, respect employee privacy, promote mutual respect and refrain from harassment of any kind.

Relevant Policy:
[West-CP-074 Social Media Policy](#)

Q&A

I noticed that a co-worker posted a picture of himself on his Facebook page. The photo showed him at one of West’s facilities in an area that is normally off-limits to the public. Could this be a problem?

Yes. He could be inadvertently disclosing confidential information and should remove the photo. If you are not comfortable communicating with him directly, speak to your manager, a Human Resources representative or contact the Compliance and Ethics Office.





Our Business

Product and Service Quality
Fair Competition
Gathering Competitive Information
Improper Payments
Use and Selection of Agents
International Business
Political Activity
Environmental Sustainability



Product and Service Quality

West is committed to safeguarding the health and safety of consumers who use our products and services. It is our policy to provide high-quality products that are safe and effective for their intended use. Quality product and system controls are designed to ensure compliance with our high standards and applicable laws.

We expect each employee to contribute to these standards by providing high-quality work, being familiar with laws and regulations that relate to their areas of responsibility, and participating in training programs provided by the Company covering a broad range of activities.

Employees are also encouraged to identify and improve practices that could impair product quality, safety or compliance with law. All operating units have the responsibility to design, manufacture and deliver quality products and services.

West helps to ensure product quality by:

- adhering to regulatory and generally accepted good manufacturing and laboratory practices, and quality system requirements;
- properly registering products with truthful and complete information;
- properly labeling, advertising and promoting our products; and
- responding to problems in a timely manner with appropriate corrective action.

The Company's products and services should comply with applicable government and industry standards and regulations.

Relevant Policy:
[West-CP-005 Quality Assurance](#)

Q&A

My manager asked me to skip some required quality checks in order to make a production deadline. Can I do that?

No. Do not skip the quality checks. Not following procedures may compromise the quality of the product, resulting in problems for our customers. If your manager persists, then contact your manager's manager or your plant manager to discuss the issue.

We are behind schedule for an important product launch. The customer's specifications are more restrictive than we think are necessary. If the product is still safe, can we revise or round data so that it fits within those specifications?

No. It is never acceptable to manipulate data. Also, without approval from our customer to modify the specifications, we must comply with them even if it means that we can't make a launch date.



Fair Competition

Trade Associations

Trade association meetings, government advisory groups, standard-setting organizations and other industry gatherings serve legitimate and worthwhile purposes. However, these meetings pose antitrust risks because they bring together competitors who meet and engage in discussions.

Before becoming involved in such activities you should assure yourself that membership in the association is useful to West and that the association has taken proper steps to deal with these risks, including active supervision of association activities by legal counsel and agendas and minutes for all meetings.

Even joking about a subject such as marketing or pricing strategies could be misinterpreted and misreported. If the conversation turns to any kind of anti-competitive subject, do not participate in the conversation, raise an objection, immediately excuse yourself from the meeting and promptly notify the Law Department.

West is committed to free, fair and open business competition and to competing ethically and in compliance with laws that foster competition in the marketplace. Although these laws are complex and difficult to summarize, it is important to remember that they prohibit agreements between our Company and our competitors that affect prices, terms or conditions of sale, or fair competition.

To avoid improper agreements, you must not:

- contact competitors about prices, terms or conditions of sale, production, distribution, territories or customers;
- contact suppliers and customers in a way that unfairly restricts trade or excludes competitors from the marketplace;
- enter into agreements with competitors that allocate markets or customers; and
- enter into agreements with others to boycott customers or suppliers.

Violations of antitrust laws, either deliberate or accidental, expose West and individual employees, officers and directors to serious civil or criminal penalties or lawsuits. Even the appearance of an understanding with a competitor may bring serious penalties.

If you are responsible for areas of the business where these laws apply, you must be aware of them and their implications, including how they apply in the country where you operate. Antitrust or competition laws vary from country to country.

These laws are complex and you must seek advice from the Law Department before you act.



Gathering Competitive Information

It is West's policy not to seek trade-secret information from individuals who are obligated not to disclose such information, or to employ improper means or methods to obtain non-public competitor information.

West expects employees, officers and directors to follow West's policy on gathering competitive business, manufacturing and technical information. The policy contains guidelines on appropriate conduct for individuals who collect or use competitive intelligence on behalf of West.

West uses publicly available information, including published articles, market analyses and reports, to obtain competitive information. Employees, officers or directors should not seek a competitor's confidential information, or accept anyone's confidential information, without the owner's consent. West will never use illegal (theft, bribery, misrepresentation or espionage through electronic devices) or unethical business means to obtain competitive information.

Because guidelines cannot cover every situation and since laws vary by jurisdiction, consult the Law Department if you have any questions.

Relevant Policy:
West-CP-049 Antitrust Compliance

Q&A

My manager wants me to find out pricing for a new product being launched by one of our competitors. The information is not publicly available. Can I pose as a potential customer, call the competitor and ask some questions?

No. Misrepresentation—not disclosing that you are a West employee—is an unethical way to gain access to a competitor's confidential information. It violates West policies, as well as the Integrity value. You should consult with the Law Department to confirm that your strategy is legal and ethical before engaging in primary business intelligence research.



Q&A

I believe some of the Chinese companies I call on may be partially owned by the Chinese government. Do I need to be concerned about payments to that company?

Yes. In many countries, the healthcare professionals or customers with whom we do business are Public Officials. Before offering or accepting any gifts, gratuities, hospitality, entertainment or other payments to or from a Public Official, you should consult the Law Department.

A customs official has informed me that it will take two weeks for some raw materials to clear customs, but he could speed things up if I pay him quietly \$100 in cash. Should I pay the additional amount?

No. While it would be advantageous to get the raw materials early, such a payment is likely unlawful. You must ensure that West policy is followed. This is a facilitation payment because the additional money is going directly to the official and is not part of the normal fee for customs clearance.

Facilitation payments are strictly prohibited. You must immediately report any requests for facilitation payments to the Compliance and Ethics Office or the Law Department.

Key Term: Public Official

The FCPA defines a “Public Official” as anyone employed by any government or government-controlled commercial enterprise, candidate for public office, political party or party official.

Improper Payments

West expressly prohibits improper payments in all business dealings, in every country around the world, with both governments and the private sector. West prohibits any colleague, middleman or other agent from directly or indirectly engaging in any form of bribery.

Payments to Public Officials

Most countries in which we do business have laws that forbid offering, promising, making, authorizing or providing (directly or indirectly through third parties) any payments, gifts, or anything of value to any Public Official to influence an official act or decision to award or retain business.

In the United States, the U.S. Foreign Corrupt Practices Act (FCPA) makes it illegal for employees of U.S. companies to directly or indirectly give anything of value to a non-U.S. Public Official in order to gain an improper business advantage. The FCPA also makes it illegal to inaccurately record transactions. As a U.S. company, West and all of its subsidiaries and colleagues must comply with the FCPA, as well as with all local anti-bribery and anti-corruption laws.

Commercial Individuals and Companies

West also prohibits “commercial bribery.” Generally, commercial bribery is giving, offering or receiving something of value to or from an individual or entity in exchange for improper commercial conduct. West prohibits any colleague, middleman or other agent from directly or indirectly engaging in any form of bribery.

Facilitation Payments

Facilitation payments—sometimes referred to as “grease” payments—are unofficial payments made to a Public Official or other person in order to secure or expedite the performance of a routine or necessary action. West strictly prohibits facilitation payments. Under no circumstances should anyone attempt to make such a payment on behalf of the Company.

Relevant Policies:

[West-CP-045 Anti-Corruption Policy and Procedures](#)

[West-CP-062 Business Gifts, Entertainment and Hospitality Policy and Procedures](#)

Use and Selection of Agents

We must be careful to avoid situations involving third parties that may lead to a violation of the law. It is unacceptable for a third party, such as a sales agent, distributor or other representative, to provide or offer to provide any payment or anything of value to anyone on behalf of West in an attempt to acquire or preserve business or obtain an improper advantage. Therefore, all West employees should observe the following guidelines:

- Each representative should be carefully selected and evaluated before being retained.
- All arrangements and contracts with representatives must be in writing and reviewed and approved by the Law Department.
- Commissions or other compensation must be customary and reasonable in relation to the services provided.
- All payments must be properly reflected in West's records, books of account and financial statements.
- No payments may be made in cash to third parties or to bank accounts that are not in the representative's name.

Relevant Policies:

[West-CP-043 Contract Review and Approval](#)

[West-CP-045 Anti-Corruption Policy and Procedures](#)

Q&A

We have little control over the actions of brokers and distributors who sell our products. How can the Company be responsible for acts of these independent businesses under the FCPA?

The FCPA prohibits not only direct bribery, but also willful blindness and conscious disregard of facts indicating a violation. Continuing to conduct business with a distributor if West employees know or even suspect that the distributor is bribing Public Officials, presents a high risk of violating the FCPA. This can be a complex area, so always contact the Law Department if a question arises.



Q&A

A customer asked if we could ensure that none of our products originated from Israel? Can I simply ignore or refuse to answer the question?

No. You must treat this as a suspected request to participate in an illegal boycott and you must report it to the Compliance and Ethics Office. Ignoring or refusing the request is insufficient, and is often viewed and treated as a violation of anti-boycott laws. Violations could result in civil or criminal penalties.

I was recently at a trade show and a potential customer from a country in which we have never done business requested additional information. What should I do?

Contact the Compliance and Ethics Office to determine if the country or organization is the subject of any legally imposed economic sanctions or trade limits.

Relevant Policies:
[West-CP-042 Sanctioned Countries and Restricted Parties](#)
[West-CP-044 Anti-Boycott Policy and Procedure](#)

International Business

International Tax

West fosters accountability and endeavors to adhere to the respective tax laws in the countries in which we operate. We are committed to providing transparent and accessible information to tax administrations to facilitate an understanding of our tax strategy and underlying business models.

West prides itself in its strict compliance and responsible tax management, consistently abiding by internationally-recognized transfer pricing policies. Likewise, compliance with international tax laws promotes our dedication to international best practices and supports our culture of integrity.

Anti-Boycott Laws

Our Company, including foreign subsidiaries, complies with U.S. anti-boycott laws that prohibit participating in the economic boycotts of certain other countries. These laws primarily refer to the Arab boycott of Israel. However, other boycott issues may arise. These laws also require that certain requests for boycott information be reported to the U.S. government. Because anti-boycott laws are complex, any requests, directly or indirectly, to participate in such a boycott should be directed to the Compliance and Ethics Office immediately.

Sanctioned Countries and Restricted Parties

The laws of the United States and other countries where West does business have implemented economic sanctions and trade embargoes that prohibit or restrict direct or indirect transactions with certain countries. They may also restrict our dealings with certain individuals and companies designated by the U.S. government as “fronts” for those countries or involved in activities of concern, including terrorists and persons tied to international drug trafficking or the proliferation of weapons of mass destruction.

Employees must not engage in or agree to engage in Company transactions with individuals, entities or countries against which the United States or any other government maintains trade or economic sanctions without first verifying, as directed in West’s Policy on trade and economic sanctions, that the transaction is permissible. Any questions about this topic must be referred to the Law Department.

Political Activity

Our Company encourages directors, officers and employees to become involved in the political process in their individual capacity including personal contributions to political campaigns. However, no West employee or director may conduct personal political activity on Company time or use Company funds, property or equipment for political activities.

United States federal laws impose restrictions and limitations on West's actions in contributing, directly or indirectly, to any candidate for public office, political parties or other political organizations.

You should direct questions to the Law Department before doing anything involving our Company in any political activity in the U.S. and other countries.

Q&A

My brother is running for a political office. During lunch, may I make calls from my desk in support of his campaign or use our copiers to copy brochures for his campaign?

No. Using Company time, property or facilities, or giving candidates access to West premises or facilities for political activities is prohibited.



Q&A

Environmental protection laws are so complex; how do I know when to be concerned about a particular situation?

The laws are complex, but you don't need to understand every detail before you raise an environmental concern. In general, materials should be properly labeled, used, stored and transported, and waste substances must be recycled or disposed of properly. If you use specific materials on your job, be sure you understand their properties and hazards in detail. If you are unsure, discuss it with your manager.



Environmental Sustainability

As a company dedicated to producing products that enhance the health of patients worldwide, West is also committed to protecting the environment. West wants to prevent adverse environmental impact through our manufacturing processes and our products themselves. To achieve this goal West's policy strives to:

- reduce or eliminate the creation of waste at its source;
- recycle and dispose of waste responsibly;
- continuously improve environmental sustainability practices; and
- promote a corporate culture friendly to the environment.

Recognizing that protecting the environment begins with accountability, West complies with all applicable environmental laws, permits and approvals. West believes firmly in setting goals to foster its sustainability program and make effective strides in reducing greenhouse gas emissions, waste, and energy and water usage. West has a long-standing commitment to environmental responsibility in our products, operations and with the broader community. With this in mind, West employees are expected to support our commitment to the environment by:

- integrating sustainability principles into its business processes, planning and decision making;
- identifying waste and inefficiencies;
- engaging in best practice sharing around the globe;
- independently contributing to the improvement of West's environmental performance; and
- reporting to appropriate Company resources any practice that is harmful to the environment or does not comply with our Company's policies or with governing laws, rules and regulations.

Environmental stewardship is both a company-wide responsibility and the individual responsibility of each West employee. Sustainability is not a separate, isolated mantra, but a core principle and an integral part of West's general business practices.

Getting Help

Q&A

Why should we follow the Code?

We at West strongly believe that our employees drive our success. If every employee adopts the principles of this Code, then everyone can do their part to promote company-wide, as well as personal, accountability.

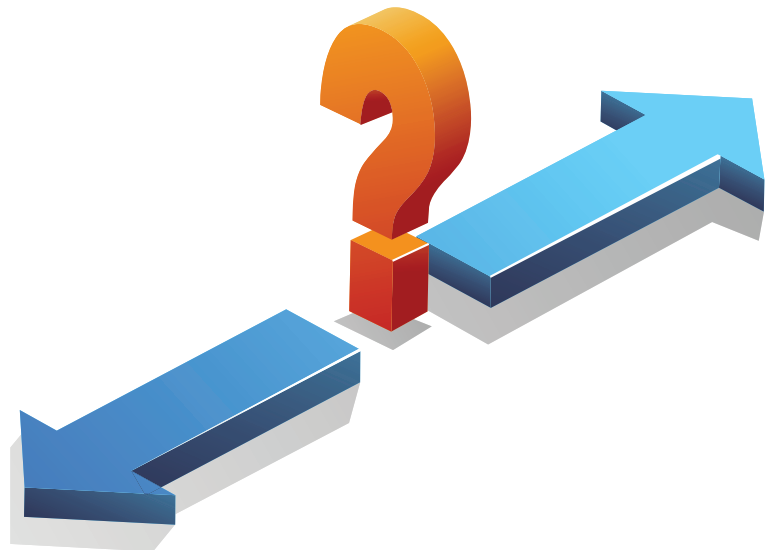
Ethical Decision Making

To maintain the respect of our stakeholders, such as our employees, our customers, government agencies and the communities in which we operate, we must navigate the global business market ethically and act with integrity at all times. Inevitably, there will be times when the right course of action is not clear. Good decision making includes knowing when to ask for help. When the best path forward is not obvious, refer to the Ethical Decision Making guide below.

Asking yourself the following questions might help in situations of uncertainty:

- Is this conduct ethical?
- Does it comply with laws, Company policies and this Code of Business Conduct?
- Will my actions align with West's Company mission, vision and core values?
- Will my actions protect my own and West's reputation?
- Have I consulted the appropriate Company resources?

If you answered "No" to any of these questions, or are not sure of the appropriate answers, stop the activity and ask for help.



Getting Help

If you have any questions about a business conduct or compliance issue, you may seek assistance in a number of ways.

1. Discuss the Situation Locally

Discuss the situation with your manager, local Human Resources representative, plant manager or local operations manager.

2. Contact the West Compliance and Ethics Office

You may call, e-mail or write to the Chief Compliance Officer:

George Miller, Sr. Vice President,
General Counsel and Corporate Secretary
West Pharmaceutical Services, Inc.
530 Herman O. West Drive
Exton, PA 19341 USA

Tel. +1-610-594-3319

George.Miller@westpharma.com or Integrity@westpharma.com

3. Use West's Integrity Helpline (Available 24 hours a day, 7 days a week, 365 days a year)

You may call or make a web-based submission to the Integrity Helpline. The Integrity Helpline is primarily to be used to report serious violations of the law, ethics or workplace rules. The Integrity Helpline is staffed by an organization not affiliated with West, and to the extent possible (and in conformity with local regulations), callers may remain anonymous. The caller will be given a personal identification number (PIN) for follow-up and resolution information.

All callers will have the opportunity to discuss the complaint with a Helpline operator in their native language 24 hours a day, 7 days a week, 365 days a year. If you are non-English speaking, please wait until the line operator answers and then let them know what language you require. The operator will conference-in an individual who speaks your language. While the operator locates an interpreter you may hear music or a pause, please remain on the line. An interpreter will then join your conversation to assist you and the Helpline operator in completing the call.

Once the operator has logged the complaint, depending on the nature of the complaint, it will be routed to either the Chairman of the Board of Directors, Audit Committee and/or the Compliance and Ethics Office for investigation, follow-up and disposition. All callers will be able to dial back into the operator using their assigned report and PIN to gain feedback on the status or resolution of the complaint.

Integrity Helpline Website:

<http://www.west-helpline.com>

<http://www.west-euhelpline.com>

Getting Help

Integrity Helpline Phone Numbers:

In the U.S. Dial 1-866-814-2685

From outside the U.S.: Dial the appropriate international AT&T dialing code from a phone with international calling capabilities. After dialing the **international AT&T dialing code** (see list below), pause until you hear the operator, a voice prompt or series of tone prompts. **Then dial the Helpline number, 866-814-2685** (for France: 800-931-0609).

Integrity Helpline Numbers

Country	Access Code	Toll-free Number
Argentina	0-800-555-4288	866-814-2685
Australia	1-800-881-011	
Belgium	0-800-100-10	
Brazil	0800-888-8288	
China (Shanghai and Guangzhou)	10-811	
China (Beijing)	108-888	
Colombia	01-800-911-0011	
Denmark	800-100-10	
France	0800-99-0011	800-931-0609
Germany	0800-225-5288	866-814-2685
India	000-117	
Ireland	1-800-550-000	
Israel	1-80-949-4949	
Italy	800-172-444	
Mexico	01-800-288-2872 01-800-112-2020 (Spanish)	
Netherlands	0800-022-9111	
Serbia*		
Singapore	800-011-1111	866-814-2685
Spain	900-99-0011	
UK	0-800-89-0011	
Venezuela	0-800-552-6288	

* Dialing from Serbia: If you are calling from Serbia, dial an international operator and then the collect number 00-1-704-943-1125.

4. Contact the Audit Committee About Accounting, Internal Control or Auditing Matters

If you have a complaint or suspect a violation of the Code that concerns an accounting, internal accounting control or auditing matter, you may send your complaint directly to the Chairman of the Audit Committee of our Board of Directors. Complaints sent through this means will be received directly by the Audit Committee and not by West management.

Chair of the Audit Committee of the Board of Directors

West Pharmaceutical Services, Inc., P. O. Box 3066 Exton, PA 19341

Corporate Policies Index

All of the following West Corporate Policies are referenced in the Code of Business Conduct:

Policy No.	Policy Title	Policy No.	Policy Title
West-CP-001	Delegation of Authority	West-CP-052	Scientific Publications and Presentations
West-CP-002	Safety and Health	West-CP-053	Trademark Policy and Administrative Procedure
West-CP-005	Quality Assurance	West-CP-055	Compliance and Ethics Program
West-CP-012	Internal Control Over Financial Reporting	West-CP-056	Code of Business Conduct
West-CP-019	Purchasing	West-CP-057	Compliance Reporting, Confidentiality and Non-Retaliation
West-CP-022	Travel and Employee Expense Reimbursement	West-CP-058	Corporate Compliance Investigation Procedures
West-CP-042	Sanctioned Countries and Restricted Parties	West-CP-060	Record Retention
West-CP-043	Contract Review and Approval	West-CP-061	Data Privacy and Employee Personal Information
West-CP-044	Anti-Boycott Policy and Procedure	West-CP-062	Business Gifts, Entertainment and Hospitality Policy and Procedure
West-CP-045	Anti-Corruption Policy and Procedures	West-CP-063	Acceptable Use of the Internet Services
West-CP-046	Securities Trading Policy	West-CP-064	Acceptable Use of Electronic Messaging
West-CP-047	Protection of Trade Secrets and Confidential Information	West-CP-072	Information Security General Policy & Procedure
West-CP-048	Fair Disclosure of Company Information	West-CP-074	Social Media Policy
West-CP-049	Antitrust Compliance	West-CP-079	Conflicts of Interest
West-CP-051	Patent Policy and Administrative Procedure		

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Nothing contained in the Code of Business Conduct is intended to affect your rights under applicable employment and privacy laws. In addition, nothing in the Code of Business Conduct or this Code booklet is intended to confer—or may be interpreted to confer—any express or implied contractual right to remain employed by the Company. Further, the Code of Business Conduct does not guarantee any fixed terms and conditions of employment.



Code of Business Conduct

