



**RESOLUTION ADOPTED AT THE MEETING OF THE  
BOARD OF DIRECTORS OF  
WEST PHARMACEUTICAL SERVICES, INC.  
MAY 7, 2019**

Supply Chain Policy Statement

WHEREAS, the United Kingdom has passed into law the Modern Slavery Act 2015 (the “UK Act”), which requires the Board of Directors of every company meeting certain criteria set out in the Section 54 of UK Act to approve an annual public statement regarding the actions that the company has taken to ensure its businesses and supply chains are slavery free (or in the alternative, acknowledge that the company has taken no such actions).

WHEREAS, the Company meets the criteria in Section 54 because it is a commercial organisation that carries on a business in the United Kingdom supplying goods and services, and it has a total global turnover including the turnover of its subsidiaries of not less than £36 million for the fiscal year ending December 31, 2018.

WHEREAS, the requirements of the UK Act are similar to the requirements of the California Transparency in Supply Chains Act of 2010 (“CTSCA”), legislation with which the Company must also comply.

WHEREAS, the Board of Directors has been asked to approve the following public statement to reflect the Company’s compliance with both the UK Act and CTSCA for the fiscal year just ended (the “Statement”):

West Pharmaceutical Services, Inc. Statement of Compliance

2018 Fiscal Year Statement under the UK Modern Slavery Act 2015

and

California Transparency in Supply Chains Act

West complies with the Modern Slavery Act 2015 promulgated in the United Kingdom (the “UK Act”) because it is a commercial organization that carries on a business in the United Kingdom supplying goods and services and it has a total global turnover including the turnover of its subsidiaries of not less than £36 million for the fiscal year ending December 31, 2018.

West also 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 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
- Fair treatment
- Child labor and young workers
- Wages, benefits and working hours
- Non-discrimination
- Freedom of association

In 2017, West became a signatory to the “Ten Principles of the United Nations Global Compact” (“UNGC”) on human rights, labor, environment and anti-corruption. Its participation demonstrates its intent to take steps to prevent forced labor and human trafficking in its operations and supply chain. West is committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of the Company and to engaging in collaborative projects that advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

Further, West continues to maintain a comprehensive Compliance and Ethics Program (the “Compliance 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 of West and its affiliated companies must certify annually that they understand and agree to follow the Code. The Code is a public document that also applies to West’s 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, both of which are available [here](#).

The Board of Directors is adopting this Statement on behalf of the Company to comply with its regulatory obligations under the UK Act.

NOW, THEREFORE, BE IT RESOLVED that the Statement as set forth above is hereby approved and that the General Counsel of the Company is hereby authorized to sign the Statement on behalf of the Company.

BE IT RESOLVED FURTHER that the General Counsel of the Company is hereby authorized and directed to publish the Statement in the manner the General Counsel sees fit including, without limitation, on the Company's website and include a link to the slavery and human trafficking statement in a prominent place on the homepage of the Company's website.