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Introduction

The Avantor Responsible Supplier Code of Conduct (the “Code”) is aimed at Suppliers to Avantor, Inc. and its subsidiaries (“Avantor”). Suppliers for the purpose of this Code will be suppliers, contractors and non-government organizations. Avantor recognizes the interconnected nature of doing business, and our responsibility to our associates, customers, suppliers, shareholders, communities and the planet on which we depend. Avantor’s everyday actions to create a better world underpin our commitments to sustainability, governance and our corporate mission. We aim to work with Suppliers who share this commitment and together work towards making a positive impact on the environment and society.

We recognize that many of our Supplier relationships have been in place for more than twenty years, and it is these strong relationships which will be key to achieving our long-term sustainability goals. We value the meaningful sustainability progress many of our suppliers have already achieved, and hope a closer collaboration between us will yield even greater advances in the future. Avantor is a continuous learning organization and as such we will periodically update this Code, as our sustainability journey unfolds.

We are committed to creating a better world — for our people and our planet — by adopting sustainable business practices across our value chain. These practices form part of our governance framework which has four pillars: People & Culture, Innovation & Environment, Community Engagement and Governance & Integrity.
Avantor Responsible Supplier Commitment

01. PEOPLE AND CULTURE

HUMAN RIGHTS
Our Suppliers (and their suppliers) shall commit to respect human rights and to honor fair labor standards in all business operations around the globe, in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), all internationally recognized human rights, those expressed in the International Bill of Human Rights (i.e. the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

DIVERSITY AND INCLUSION
Connecting our customers with niche and diverse suppliers supports our promise of exceptional choice and quality products and services, that is why our commitment to diversity is so important to our success. We encourage all our Suppliers to foster a culture of diversity and inclusion in the workplace, to join relevant associations to support the increase of diversity and inclusion in the workplace and to communicate to Avantor the Supplier’s diverse and inclusive status. Example associations have been given in the appendix.

FAIR LABOR CONDITIONS
Even though we and our suppliers often operate in different countries — each with its own laws and practices — our suppliers shall uphold the following labor rights of workers and treat them with dignity and respect.

Freely Chosen Employment
Suppliers shall not use forced, bonded or indentured labor or involuntary prison labor or engage in any form of human trafficking. No worker shall pay for a job or be denied freedom of movement.

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 non-hazardous work and when young workers are above a country’s legal age for employment or the age established for completing compulsory education.

Non-discrimination
Suppliers shall provide a workplace free from discrimination. There shall be no discrimination for reasons such as race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.

Fair Treatment
Suppliers shall provide a workplace free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and no threat of any such treatment.

Wages, Benefits and Working Hours
Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with their workers, the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with their workers whether overtime is required and the wages to be paid for such overtime. Overtime shall be consistent with applicable national and international standards.

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.

HEALTH AND SAFETY
Suppliers shall provide a safe and healthy working environment (and living quarters where relevant). Health and Safety measures shall extend to contractors and subcontractors on Suppliers’ sites.

Worker Protection
Suppliers shall protect workers from over exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and in any company provided living quarters. Suppliers shall ensure appropriate housekeeping and provide workers with access to potable water.
Process Safety
Suppliers shall have management processes in place to encourage safe working practices, to identify the risks from chemical and biological products and to prevent or respond to release of chemical or biological agents.

Emergency Preparedness and Response
Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and to minimize their impact by implementing emergency plans and response procedures and ensuring workers are well trained to follow them if/when necessary.

Hazard Information
Safety information relating to all hazardous materials shall be available to educate, train, and protect workers from known hazards.

02. INNOVATION AND ENVIRONMENT

We believe innovation and environment go hand-in-hand. Avantor is mobilizing to act against climate change and other key environmental sustainability issues. Climate change is a global challenge that poses a significant risk to human and environmental health and the way we do business, therefore, we cannot do this alone.

Together we can leverage Science for Goodness. As a basis for this innovation collaboration, we expect our Suppliers to share Avantor’s continuous improvement mindset in diminishing adverse impacts on the environment from our respective operations. Suppliers are encouraged to collaborate with us to reduce their carbon footprint and deliver solutions that combat climate change and support a low-carbon economy across our joint value chain.

RESOURCE USE
Suppliers shall monitor and manage their environmental impact by tracking their energy and water use, waste generation, recycling and other related activities. Suppliers shall take action to reduce their impact by lowering energy consumption (electricity, gas and fuels) while seeking renewable and other lower-impact energy sources and promoting the use of environmentally preferable products and packaging. We also expect our Suppliers to support the principles of the Paris Agreement1 and aim to reduce their greenhouse gas emissions in line with this. Suppliers shall raise awareness of combating climate change with their employees.

WASTE AND EMISSIONS
Suppliers shall have systems in place to protect the environment by preventing pollution from production and logistics, and avoiding or minimizing waste generation. Suppliers shall ensure the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, water effluent or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to being released into the environment.

SPILLS AND RELEASES
Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.

SUSTAINABLE SOURCING AND TRACEABILITY
Suppliers shall carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing.

RESPONSIBLE MINERALS
Suppliers shall adhere to practices that do not support conflict or human rights abuses. We rely on our suppliers to provide information about the origin of the tin, tantalum, tungsten and gold contained in the components, raw materials and products supplied to us, including sources of these metals that are supplied to them from sub-tier suppliers. To collect this information, we request that Suppliers use the Responsible Minerals Initiative (“RMI”) Conflict Minerals Reporting Template to identify the metal smelters or refiners and associated countries of origin. A tracking system monitors Suppliers’ responses and due diligence progress to further promote transparency in our supply chain.

ENVIRONMENTAL AUTHORIZATIONS AND REPORTING
Suppliers shall comply with all relevant environmental legislation, regulations and other requirements. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

1  https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement
**03. COMMUNITY ENGAGEMENT**

Our mission of setting science in motion to create a better world drives our purpose and our Science for Goodness ethos for Community Engagement. Being committed to this purpose means helping to strengthen the communities in which we work and live. We achieve this through philanthropic giving from Avantor and the Avantor Foundation, and through our associates taking action to support healthcare access, advance STEM education and protect the environment. Suppliers are strongly encouraged to engage with us and their community leaders in this vital philanthropic work. Together, we can create goodness that makes a positive, lasting impact on our society and planet – today and for future generations.

**04. GOVERNANCE AND INTEGRITY**

**MANAGEMENT SYSTEMS AND DOCUMENTATION**
Suppliers shall use management systems to maintain business continuity, determine and manage risks, facilitate continual improvement and commitment to the elements in this Code. Suppliers shall maintain documentation necessary to demonstrate commitment to this Code and compliance with applicable regulations.

**CONFLICTS OF INTEREST**
Suppliers shall take reasonable care to avoid and manage conflicts of interest. Avantor defines a conflict of interest as a situation when personal interests or personal activities could compromise, or appear to compromise, the supplier’s objectivity, impairing the ability to make good business decisions that are in the best interest of Avantor. Suppliers are expected to notify all affected parties if an actual or potential conflict of interest arises.

**ANTI-CORRUPTION AND ANTI-BRIBERY**
Avantor is committed to abiding by the United States Foreign Corrupt Practices Act (referred to as the FCPA) and the anti-corruption and anti-bribery laws of every country in which we operate. Suppliers shall not improperly give anything of value to government officials while conducting business relating to Avantor and shall ensure they have adequate systems in place to prevent bribery or other corrupt, dishonest acts. Suppliers shall maintain books and records that accurately and fairly reflect all payments, expenses, and transactions involving government officials while conducting business relating to Avantor. Suppliers shall also comply with all other applicable anti-corruption laws, including but not limited to, anti-money laundering, economic sanctions and trade compliance laws and regulations.

**FAIR DEALING AND COMPETITION**
Part of good ethical behavior is creating positive business relationships that ensure a fair playing field. We and our suppliers should behave honorably, and shall avoid acts or practices that are deceptive or illegal. Suppliers shall conduct their business in compliance with all applicable competition laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

**PROTECTING PERSONAL, INTELLECTUAL AND CONFIDENTIAL DATA**
Suppliers shall safeguard personal, intellectual and confidential data and ensure personal privacy rights are protected. Suppliers shall comply with all applicable privacy and data protection laws and ensure the protection, security and lawful use of personal data.

**COMMUNICATION**
Suppliers shall have effective systems to communicate this Code to their workers, contractors and suppliers. Suppliers also commit to report promptly to Avantor of any breaches of this Code.

**IDENTIFICATION OF CONCERNS**
All workers shall be encouraged to report concerns, illegal activities or breaches of the Code in the workplace without threat of or actual reprisal, intimidation or harassment. Supplier management shall investigate and take corrective action if needed.

Suppliers also commit to report promptly to Avantor of any breaches of this Code.
REFERENCES

The elements of this Code are based on the following references. They are included for information only.

GENERAL
Avantor Code of Ethics and Conduct
Sustainability at Avantor
United Nations Global Compact
OECD Guidelines for Multinational Enterprises

HUMAN RIGHTS
United Nations Human Development Index (UN HDI)
Universal Declaration on Human Rights
International Covenant on Economic, Social and Cultural Rights
International Covenant on Civil and Political Rights
United Nations Guiding Principles on Business and Human Rights
UK Modern Slavery Act 2015

DIVERSITY AND INCLUSION
Australia: Supply Nation (for indigenous-owned businesses)
Canada: Canadian Aboriginal & Minority Supplier Council (CAMSC)
China: Minority Supplier Development (MSD)
Global: National Lesbian, Gay, Bisexual, Transgender, and Intersex Chambers of Commerce (NGLLC International)
Global: Global Supplier Diversity Alliance
Global: WE Connect International (for women-owned businesses)
South Africa: South African Supplier Diversity Council (SASDC)
UK: Minority Supplier Development UK (MSDUK)
US: National Minority Supplier Development Council (NMSDC)
US: Women's Business Enterprise National Council (WBENC)
US: National Lesbian, Gay, Bisexual, Transgender, and Intersex Chamber of Commerce (NGLCC)

US: United State Hispanic Chamber of Commerce (USHCC)
US: Asian Pacific American Chamber of Commerce (APAAP)
US: Native American Chamber of Commerce (NACC)
US: Vets First Certification Program (for veteran-owned small businesses)
US: Business Leadership Network (USBLN, for disabled-owned small businesses)
US: Small Business Administration

FAIR LABOR CONDITIONS
International Labor Standards (ILO)
International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
Fair Labor Organization Workplace Code of Conduct

HEALTH AND SAFETY
OECD Guiding Principles for Chemical Accident, Prevention, Preparedness and Response
ISO 45001 - Occupational Health and Safety International Standard

ENVIRONMENT
ISO 14001 - Environmental Management International Standard
Forest Stewardship Council
Dodd-Frank Act, Section 1502 on Disclosure of Conflict Minerals
Disclosing the Use of Conflict Minerals Fact Sheet

ANTI-CORRUPTION AND ANTI-BRIBERY
United Nations Convention Against Corruption
OECD Anti-Bribery Convention
Transparency International Corruption Perceptions Index (TI CPI)
US Foreign Corrupt Practices Act 1977
UK Anti-Bribery Act 2010