

Avantor Channel Distributor Code of Conduct

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Introduction

The Avantor Channel Distributors Code of Conduct (the “Code”) is aimed at Channel Distributors to Avantor and its subsidiaries (“Avantor”). For purposes of this Code, Channel Distributors are authorized resellers of products manufactured or distributed by Avantor. Avantor recognizes the interconnected nature of doing business, and our responsibility to our associates, customers, suppliers, distributors, 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 Channel Distributors who share this commitment and together work towards making a positive impact on the environment and society. 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 Channel Distributors Commitment

01. PEOPLE AND CULTURE

HUMAN RIGHTS

Our Channel Distributors 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 (UNGPs), 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

We encourage all our Channel Distributors 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 Channel Distributor's diverse and inclusive status.

FAIR LABOR CONDITIONS

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

Freely Chosen Employment

Channel Distributors 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

Channel Distributors 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 of the applicable legal age and satisfy other requirements for employment.

Non-discrimination

Channel Distributors shall provide a workplace free from discrimination. There shall be no discrimination on the basis of a person's age, religion, disability, national origin, race, gender, sexual orientation or any other legally protected characteristic or activity.

Fair Treatment

Channel Distributors 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

Channel Distributors shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Channel Distributors shall communicate with their workers, the basis on which they are being compensated in a timely manner. Channel Distributors 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. Channel Distributors shall respect the rights of workers, as set forth in applicable 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

Channel Distributors shall provide a safe and healthy working environment (and living quarters where relevant). Health and Safety measures shall extend to contractors and subcontractors.

Substance Abuse

We expect our Channel Distributors to maintain a workplace free from the illegal use, possession, distribution, manufacture, sale, or purchase of controlled substances.

Worker Protection

Channel Distributors shall protect workers from over exposure to chemical, biological, and physical hazards in the workplace and in any company provided living quarters. Channel Distributors shall ensure appropriate housekeeping and provide workers with access to potable water.



Process Safety

Channel Distributors 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

Channel Distributors 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 Channel Distributors to share Avantor's continuous improvement mindset in diminishing adverse impacts on the environment from our respective operations. Channel Distributors 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

Channel Distributors shall monitor and manage their environmental impact by tracking their energy and water use,

waste generation, recycling and other related activities. Channel Distributors 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 Channel Distributors to support the principles of the Paris Agreement¹ and aim to reduce their greenhouse gas emissions in line with this. Channel Distributors shall raise awareness of combating climate change with their employees.

WASTE AND EMISSIONS

Channel Distributors shall have systems in place to protect the environment by preventing pollution from production and logistics and avoiding or minimizing waste generation. Channel Distributors shall ensure the legal and safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges.

SPILLS AND RELEASES

Channel Distributors shall have systems in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community in compliance with applicable laws and regulations.

NON-EXCLUSIVE CHANNEL DISTRIBUTORS - SUSTAINABLE SOURCING AND TRACEABILITY

Non-exclusive Channel Distributors shall carry out due diligence on all of their other suppliers to ensure legal and sustainable sourcing.

RESPONSIBLE MINERALS

Channel Distributors shall adhere to practices that do not encourage the use of conflict minerals or human rights abuses.

ENVIRONMENTAL AUTHORIZATIONS AND REPORTING

Channel Distributors 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 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. Channel Distributors 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

Channel Distributors shall use management systems to maintain business continuity, determine and manage risks, facilitate continual improvement and commitment to the elements in this Code. Channel Distributors shall maintain documentation necessary to demonstrate commitment to this Code and compliance with applicable laws and regulations.

PERFORMANCE OF U.S. GOVERNMENT CONTRACTS

Channel Distributors performing as U.S. government contractors (whether direct or indirect) must comply with the requirements in Federal Acquisition Regulation (FAR) 4.7 – Contractor Records Retention and its subparts. Channel Distributors that are performing or fulfilling a U.S. government role in their prescribed work must comply with the records requirements of the affected agency and any relevant National Archives and Records Administration (NARA) requirements that apply to that agency.

CONFLICTS OF INTEREST

Channel Distributors shall avoid 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 Channel Distributor's objectivity, impairing the ability to make good business decisions. Channel Distributors 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. Channel Distributors shall not improperly give anything of value to government officials and shall ensure they have adequate systems in place to prevent bribery or other corrupt, dishonest acts. Channel Distributors shall maintain books and records that accurately and fairly reflect all payments, expenses, and transactions involving government officials. Channel Distributors 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 Channel Distributors shall behave honorably, and shall avoid acts or practices that are deceptive or illegal. Channel Distributors shall conduct their business in compliance with all applicable competition laws. Channel Distributors shall employ fair business practices including accurate and truthful advertising.

PROTECTING PERSONAL AND CONFIDENTIAL DATA

Channel Distributors shall safeguard personal and confidential data and ensure personal privacy rights are protected and comply with all applicable privacy and data protection laws.

COMMUNICATION

Channel Distributors shall have effective systems to communicate this Code to their workers, contractors, and any other supplier.

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. Channel Distributor management shall investigate and take corrective action if needed.

Channel Distributors shall promptly report to Avantor any breaches of this Code.