



**OUR  
CODE**

For the lives we protect & enhance.

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# NAVIGATING OUR CODE



Our Code contains Emergent's guiding principles for conducting business legally, ethically, and responsibly. We've organized it so you can quickly and easily find the information you need. On this page, you'll discover some of the ways you can find your way around Our Code.



## USE LINKS WITHIN THE TABLE OF CONTENTS

Jump to any section or subsection by clicking on the page number or page title.



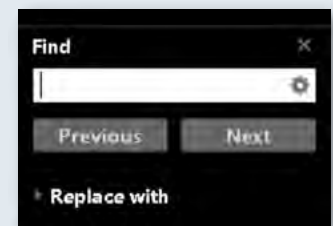
## RETURN TO TABLE OF CONTENTS WITH THIS ICON



Click this icon on any page to return to the front of Our Code.

## SEARCH WITH ADOBE ACROBAT "FIND"

On Windows, Android, and iOS devices, you can use the built-in find function to do simple searches for exact words or phrases.



1 Click magnifying glass near top of Adobe Reader.

2 Enter word or phrase you want to find in search box.

3 Click enter button on a physical keyboard or the magnifying glass on a device's virtual keyboard.

4 You will be taken to the first available result. Tap right or left arrow to show next or previous time the term shows up.

# OUR PEOPLE FIRST COMMITMENT

**At Emergent, our mission is to protect and enhance life.** When we show up for work, each of us supports a mission to develop, manufacture, and deliver protections against public health threats around the world.

**That is a big task—and this is a complex business—so we always focus on what we can control as individuals.** Each of us takes responsibility for delivering quality results in the work we do, because our individual actions and decisions impact other people. Patients, soldiers, colleagues, partners, shareholders, and many others—they all rely on us to do our best.

**At Emergent, we have a culture that puts those people first.** We commit to the highest standards of ethical conduct and corporate governance. We live by our values, act with integrity, and follow the policies, procedures, regulations, and laws that apply to our business activities. Doing this every day earns and maintains the trust of our customers, employees, and shareholders.



# OUR PEOPLE FIRST COMMITMENT



01

**WE CREATE A  
RESPONSIBLE &  
VIBRANT  
WORKPLACE**

Our success in serving people depends on our collective strengths and ability to work as a team. We respect others and celebrate diversity and inclusion. We look out for our colleagues' well-being and growth. We act professionally towards them and promote a safe, secure, and healthy Emergent workplace. Our open ears, minds, and hearts lead to conversations that let us feel heard and give us the opportunity for growth.

02

**WE TAKE  
RESPONSIBILITY  
FOR OUR  
PRODUCTS**

Our individual actions matter. With every decision, we each have an opportunity to impact what Emergent stands for by showing what we as individuals stand for. We hold ourselves to high ethical, scientific, medical, and quality standards in all of our work. We conduct ethical research, provide safe products, and maintain a culture where quality and compliance is in all that we do and make.

03

**WE PROTECT  
OUR ASSETS &  
INFORMATION**

We rely on company assets and information to do our work every day. It's up to each of us to take care of the resources, property, and information entrusted to us. We use them properly and protect them from loss, damage, theft, and waste. We respect data privacy, keep accurate records, and avoid conflicts of interest. We use social media and other external communications in a responsible way.

04

**WE COMPETE  
WITH INTEGRITY  
IN THE  
MARKETPLACE**

We believe we can outperform our competitors based on the quality of our products, the performance of our people, and the strength of our ideas. We do not engage in bribery, corruption, and unfair competitive practices. We only work with ethical third parties and ethically engage with them, too. We follow all rules, laws and regulatory requirements for our business with governments, non-government organizations, and commercial customers. We communicate, advertise and promote our approved products and our business services in a fair and truthful manner.

05

**WE LIVE AS  
GOOD GLOBAL  
CITIZENS**

Our mission to protect and enhance life goes beyond the products and services that Emergent delivers. We also give support to external organizations and programs that align with our vision and mission. We ensure all giving is ethical, transparent, and independent. We bring value through our medical education and scientific exchange. We work to achieve our environmental, social, and governance priorities to improve long-term sustainability.

## A MESSAGE FROM OUR CEO



Dear Colleagues,

When I started my career in the pharmaceutical industry, I was driven by the promise of helping improve patients' lives, having experienced firsthand the power of therapeutics as a child with an unexplained illness. As president and chief executive officer of Emergent, I believe we have great opportunities in front of us. Whether it's increasing access to NARCAN® Nasal Spray to help combat the opioid epidemic or continuing to deliver life-saving medical countermeasures to customers around the world, Emergent provides critical products to address global health crises.



Our work is guided by our values: Lead with Integrity, Stand Shoulder to Shoulder, Own It Always, Break Through Thinking, and Compete Where It Counts. Equally, we are committed to abiding by one code of conduct and business ethics — Our Code.

Our Code outlines the ethical principles that unite our diverse company and support our vision, mission, and values. It gives practical advice on maintaining quality and compliance, working with integrity, and always doing the right thing, the right way, every time. It's written with extensive input from employees across the company, capturing our passion and purpose. Every day, each of us owns decisions that add up to making a big impact on people's lives: military personnel, first responders, and everyone who may be in a position to help save a life from an opioid overdose emergency.

For every single person touched by our work, we operate with an unwavering commitment to honesty, integrity, and quality. We recommit to Our Code every single workday. We apply our ethical principles to all of our business decisions and actions.

We do so because we are Emergent. And we put people first.

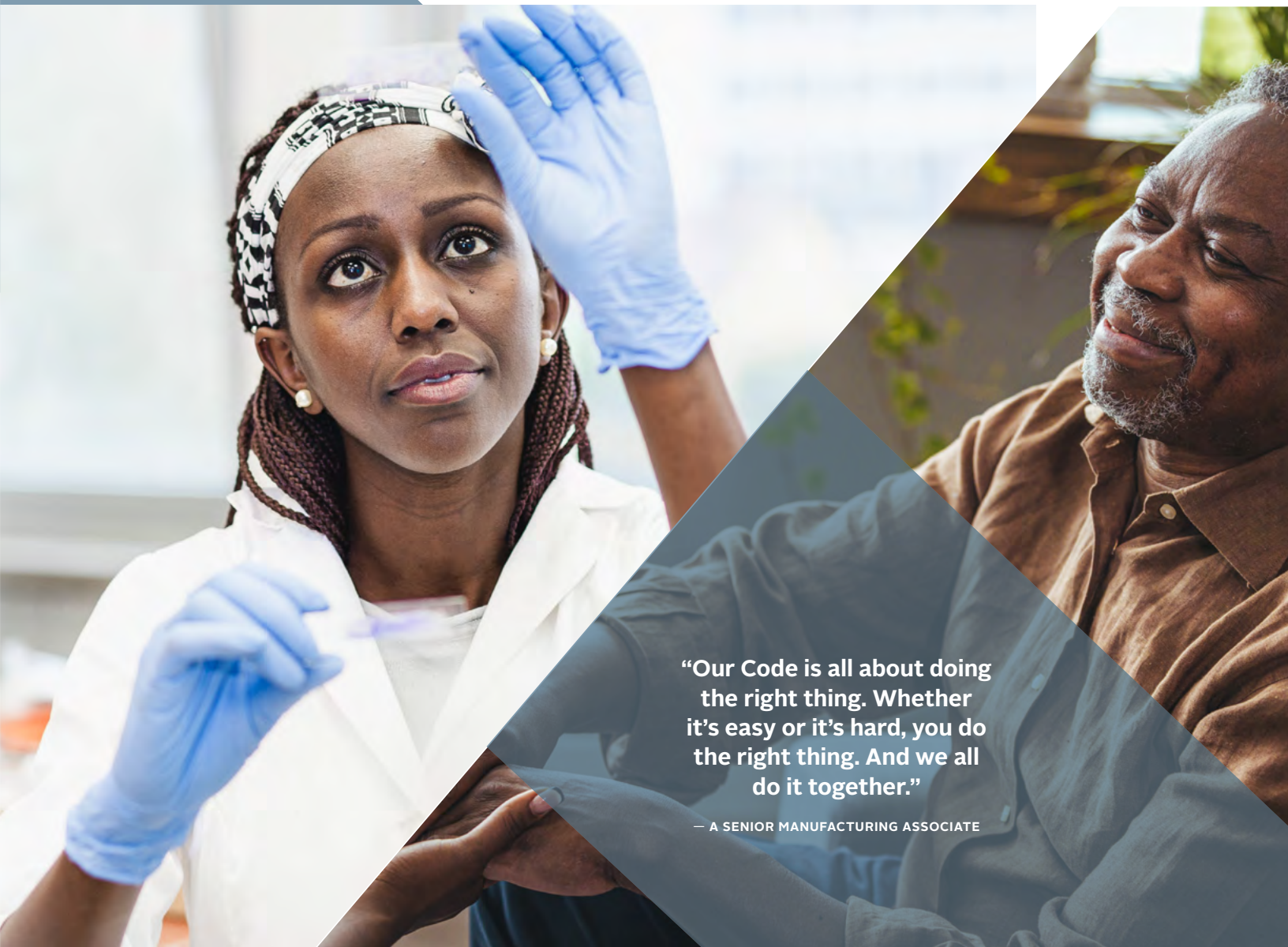
Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Papa'.

**Joseph C. Papa**

**PRESIDENT & CHIEF EXECUTIVE OFFICER**

# WE LIVE BY OUR CODE



“Our Code is all about doing the right thing. Whether it’s easy or it’s hard, you do the right thing. And we all do it together.”

— A SENIOR MANUFACTURING ASSOCIATE



# WE LIVE BY OUR CODE



## **OUR CODE REFLECTS WHO EMERGENT IS & WHAT WE DO**

At Emergent, we take pride in the work we do, because our products protect people and enhance their lives. We also take pride in the people we work with every day, often calling our colleagues caring, passionate, dedicated, hardworking, smart, and professional.

With that pride comes responsibility. Customers and coworkers rely on us to do the right thing. To deliver quality products and services. To learn from our mistakes. To make continuous improvements that strengthen our current capabilities and prevent future shortcomings.

Our Code reflects our pride and our responsibilities. It reflects Emergent's commitment to conducting business legally, ethically, and responsibly—following all relevant laws, regulations, and industry standards that apply to our work, wherever we do it.

Because of this, you can use the principles outlined in Our Code as your guide when making decisions and taking action. Our customers and your colleagues rely on you to act with integrity, honesty, and transparency. And Our Code helps you to do that. It won't cover every situation, but it will point you in the right direction to make the right decision.

# OUR CODE. OUR VALUES.



Each of the guiding principles in Our Code will have its related value(s) listed next to the section title. The primary value is listed first.



## **LEAD WITH INTEGRITY**

We gain trust and confidence through ethics, quality, and compliance excellence.



## **STAND SHOULDER TO SHOULDER**

We combine our best thinking and communicate openly to support each other.



## **OWN IT ALWAYS**

We are engaged and accountable for delivering on our commitments.



## **BREAK THROUGH THINKING**

We pursue innovation, and challenge ourselves to constantly improve.



## **COMPETE WHERE IT COUNTS**

We set appropriate goals and respect each other as we accomplish them together.

# WE LIVE BY OUR CODE



## **OUR CODE APPLIES TO EVERYONE**

Like a shield, Our Code helps protect our people, our customers, and our company. Each of us must carry that shield so we leave no holes in our defense. That means everyone must abide by Our Code. That includes board members, employees, and temporary staff like contractors and consultants.

Regardless of role, you must read, understand, and follow Our Code, along with the policies and procedures that apply to your role or business activities. If you don't, you may face disciplinary action, up to and including termination.

Accountability starts with you. As you make decisions at work:

1. Evaluate the situation.
2. Refer to the principles in Our Code, as well as relevant policies and procedures.
3. Consider the impact of your choice.
4. If you're not sure what to do, seek guidance from relevant subject matter experts and agree on appropriate next steps.

## **OUR CODE CALLS FOR LEADERSHIP IN ALL ROLES**

Leadership is the ability to influence and guide other people and events. No matter your position, you can influence your area of responsibility and your colleagues by living Our Code and showing our core leadership competencies:

- Demonstrate Integrity & Instill Trust.
- Manage Complexity.
- Drive Engagement.
- Plan & Align.

# WE LIVE BY OUR CODE



## **OUR CODE REQUIRES US TO REPORT CONCERNS**

You have a voice and that voice matters. We expect people to be open and honest in reporting potential violations of Our Code or failures to follow our policies and procedures. That way, we can assess causes, learn from mistakes, and take corrective and preventive action as needed.

Have the courage to speak up when you need guidance or suspect misconduct. Also, have the courage to [listen](#) when others ask for help or report a concern to you.

Immediately report any concerns or potential misconduct to a supervisor, senior management, Legal, Quality, Ethics and Compliance, or Human Resources. You may also report through the independently-operated Emergent Speak Up Line, which also accepts anonymous reports where allowed.

Reports are kept confidential to the greatest extent possible and are subject to our [non-retaliation policy](#) in our Employee Handbook.

**FIND THE EMERGENT SPEAK UP LINE  
PHONE NUMBER FOR YOUR COUNTRY AT  
[SPEAKUP.EMERGENTBIOSOLUTIONS.COM](https://speakup.emergentbiosolutions.com).**

# WE LIVE BY OUR CODE



## **OUR CODE SUPPORTS INVESTIGATION & DISCIPLINARY PROCESSES**

An objective investigator will review reports of alleged misconduct to decide a course of action. When appropriate, they will conduct a fair and thorough investigation and/or assessment of the facts and circumstances. If they find any wrongdoing, Emergent will take appropriate corrective and disciplinary actions.

To the greatest possible extent, Emergent will try to keep concerns confidential and only share information on a strict need-to-know basis.

Since potential violations affect all of us, you must aid any internal or external investigation if asked, giving truthful, complete information. If an external investigator or auditor contacts you about your work for Emergent and you're not sure how to proceed, [contact Legal](#).

## **OUR CODE PROHIBITS RETALIATION**

Raising questions or sharing concerns that you believe are true and accurate shows courage, teamwork, and leadership.

That's why we do not allow retaliation against employees who:

- [Speak up](#) and report issues in good faith.
- Cooperate in the investigation of an alleged misconduct report.

Retaliation includes any action that negatively impacts someone's job or working conditions. Anyone who retaliates faces disciplinary action, including termination.

To learn more, please see our [Employee Handbooks](#).

# 01

**WE CREATE A  
RESPONSIBLE &  
VIBRANT  
WORKPLACE**

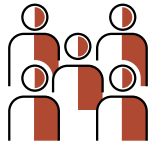


**“It’s definitely a place that values lifting each other up, helping each other out, and honoring the commitments we make to each other.”**

**— A SUPERVISOR**



# WE CREATE A RESPONSIBLE & VIBRANT WORKPLACE



STAND  
SHOULDER TO  
SHOULDER

## WE RESPECT OTHERS, DIVERSITY & INCLUSION

Our success depends on the people who work at Emergent. Each of us has unique knowledge, experience, and skills based on our background. Our varied perspectives and talents come together to drive innovative thinking and better decision-making. Together, Emergent is greater than the sum of its parts.

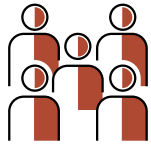
Personal attributes such as race, color, gender, national origin, age, religion, disability, medical condition, sexual orientation, gender identity, marital status, etc. contribute to this diversity and strength. As an equal-opportunity employer, Emergent celebrates inclusion.

To be a part of our team, you can never allow someone's personal attributes to influence your decisions or treatment of them, in any way. This includes employment-related decisions such as recruitment, hiring, compensation and benefits, promotions, transfers, professional development, termination, etc.

Treat everyone with respect, fairness, and professionalism. Give them an equal opportunity to succeed, as well as freedom from harassment and bullying, so that we may all succeed together. And reward them for driving the business forward with smart decisions that reflect [our core values](#).

To learn more, please see our [Employee Handbooks](#).

# WE CREATE A RESPONSIBLE & VIBRANT WORKPLACE



STAND  
SHOULDER TO  
SHOULDER

## WE HAVE OPEN EARS, MINDS, AND HEARTS

Emergent knows that employees who feel encouraged to ask questions, give opinions, and report concerns tend to also feel more involved in the business. When they feel heard, it increases employee engagement, reduces turnover, and improves the quality of their lives—and our products.

Always promote a respectful setting that reassures colleagues they can use their voices. Work with them so both you and they feel heard. Be open to giving and receiving feedback on performance, as well as being challenged to try new ways of doing things.



# WE CREATE A RESPONSIBLE & VIBRANT WORKPLACE



OWN IT ALWAYS



STAND  
SHOULDER TO  
SHOULDER

## WE PROMOTE A SAFE, SECURE & HEALTHY EMERGENT

Protecting and enhancing life starts with the lives of Emergent's greatest asset: our employees. We take a whole-person approach to health and well-being by providing:

- Robust physical, mental, and financial well-being programs.
- A flexible work model of remote/on-site/hybrid, when possible.
- A safe and secure work environment for employees and visitors.

For your safety and the safety of others:

- Follow all policies and procedures related to security, environmental health, and safety.
- Know what to do during an emergency or unsafe situation, and take immediate action as needed.
- Adhere to the proper use of company-issued access devices and security badges.
- Report suspicious and unsafe activities in and around facilities, as well as any injuries.
- Prepare for and respond to emerging security threats.

# WE CREATE A RESPONSIBLE & VIBRANT WORKPLACE



We have incident management and business continuity plans so we can respond to unexpected events and recover with speed.

## STAY HEALTHY. STAY SAFE.

Use proper personal protective equipment required for your work environment.

—

Do not bring weapons to work.

—

Follow policies for drug and alcohol use.

## STAY HOME WHEN ILL.

Coming to work when you have symptoms of an illness you can pass to others (such as a cold, flu, or COVID) puts your colleagues at risk. If you feel sick, use paid time off benefits or consult with your manager about working from home. For more on what to do when you feel sick, speak to HR or your manager.



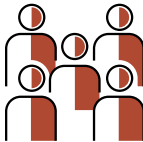
# WE CREATE A RESPONSIBLE & VIBRANT WORKPLACE



LEAD WITH  
INTEGRITY

## WE COMMUNICATE TRUTHFULLY, WITH RESPECT, AND TO HIGH STANDARDS

We believe that good communications drive good business decisions. When we're well-informed, we're better prepared to take actions that align with our vision, mission, and values.



STAND  
SHOULDER TO  
SHOULDER

Communication practices that show your commitment to the team include:

- Always strive for honesty, accuracy, and integrity in your communications, whether digital, written, or verbal. Correct mistakes if you find them.
- Try to understand what your audience really needs to know and when they need to know it. Consider if there is a better time, way, or place to communicate.
- Listen with [an open mind](#) and focus on understanding what the other person has to say. Ask follow-up questions to gain clarity, rather than assuming.
- Show respect. Disagree without being disagreeable and remember you work in a [diverse workplace](#). Avoid wording that may seem insulting, demeaning, intolerant, or hateful. Use language that feels inclusive and consider language barriers.

# 02

**WE TAKE  
RESPONSIBILITY  
FOR OUR PRODUCTS**



**“Somebody I know could end up using what we’re making. It could be family. It could be a friend. So I have to make sure it gets done right. Every time.”**

— A TESTING ANALYST



# WE TAKE RESPONSIBILITY FOR OUR PRODUCTS



**BREAK  
THROUGH  
THINKING**



**LEAD WITH  
INTEGRITY**



**OWN IT ALWAYS**

## WE HOLD OURSELVES TO HIGH STANDARDS

Emergent works to ensure the integrity of our products, services and actions because we know that patients, partners, and colleagues depend on us to do the right thing, the right way, every time. We instill trust and confidence through a commitment to quality and compliance excellence by:

- Delivering safe, effective, high-quality products that meet or exceed customer expectations.
- Complying with all relevant regulatory requirements.
- Continuously improving the effectiveness of our quality management system and maximizing performance through clearly defined objectives.
- Ensuring the integrity of our data.
- Upholding our individual and shared ownership of quality.

Emergent follows Good Practices (GxP) by complying with relevant laws, regulations, and guidelines governing:

# WE TAKE RESPONSIBILITY FOR OUR PRODUCTS



BREAK  
THROUGH  
THINKING



LEAD WITH  
INTEGRITY



OWN IT ALWAYS

- Good Laboratory Practices (GLP).
- Good Clinical Practices (GCP).
- Good Manufacturing Practices (GMP).
- Good Pharmacovigilance Practices (GPP).
- Good Distribution Practices (GDP).
- Good Documentation Practices (GDocP).

For each of these, we have developed systems and internal controls to make sure we comply with all applicable regulatory requirements. These include processes, policies, procedures, and/or training for:

- Monitoring and assessing compliance with our internal requirements and applicable laws.
- Reporting and investigating non-compliance.
- Conducting and responding to regulatory inspections, audits, and/or investigations.

To learn more, please see our [Quality Policy](#).

# WE TAKE RESPONSIBILITY FOR OUR PRODUCTS



BREAK  
THROUGH  
THINKING



LEAD WITH  
INTEGRITY



OWN IT ALWAYS

## WE CONDUCT QUALITY RESEARCH

Emergent takes a patient-centric approach to our clinical studies and trials, focusing on the safety and welfare of each person who takes part. For transparency, we register every clinical study and share results on public websites. We also take responsibility for the animals we use in our clinical trials, upholding high standards of animal care and welfare. Our approach to animal testing follows the 3 Rs:

- Reduce the number of animals used in studies to the minimal necessary.
- Refine by seeking alternatives to animal testing.
- Replace by developing and adopting non-animal methods to assess safety and efficacy.

Always make sure you:

- Follow informed consent rules.
- Support clinical studies with high-quality scientific data.
- Follow Emergent's procedures for maintaining data integrity.

# WE TAKE RESPONSIBILITY FOR OUR PRODUCTS



OWN IT ALWAYS



LEAD WITH INTEGRITY



BREAK THROUGH THINKING

## WE PROVIDE SAFE, EFFECTIVE, QUALITY PRODUCTS

Regardless of role, our individual work contributes to an overall corporate culture. At Emergent, we choose to be a culture built on quality. We're dedicated to delivering high-quality, safe, and effective products. The people who use our products trust us to do that. And they deserve no less from each of us.

Emergent has a product quality management system with extensive controls over safety, identity, strength, purity, and quality. Using defined goals and management review, we observe and continuously improve this system to maximize quality. Routine audits of operations check for effective processes and systems, as well as correct any flaws found.

We also monitor product safety throughout the product lifecycle and investigate as needed. Benefit-risk profiles are kept for all our products, and this information is available to regulatory bodies, as well as our payers, prescribers, and consumers. That way, they can make decisions with confidence.

Always put patients and safety first by doing quality work that leads to quality products by:

- Following procedures and processes that support product quality.
- Making sure you and your colleagues have the right education, training, skills, and experience to meet the required standards.
- Challenging yourself and others to improve quality.
- Working mindfully and eliminating errors or defects.
- Escalating issues if needed to ensure product safety, identity, strength, purity, and quality.



# WE TAKE RESPONSIBILITY FOR OUR PRODUCTS



OWN IT ALWAYS

## WE REPORT ADVERSE EVENTS AND PRODUCT COMPLAINTS

The welfare of people who use our products always comes first. Report any adverse event, complaint, or side effect related to our products within 24 hours by emailing [medicalinformation@EBSI.com](mailto:medicalinformation@EBSI.com). This allows us to investigate potential issues and take steps to correct them, if needed.



STAND  
SHOULDER TO  
SHOULDER

# 03



**WE PROTECT  
OUR ASSETS &  
INFORMATION**

A collage of four people. The top half features a woman with dark curly hair in a blue face mask and glasses, and another woman with a white face mask. The bottom half shows two men in white shirts looking at a tablet. The background is a mix of red and teal colors.

**“Everybody has the opportunity to  
be influential and engaged owners  
of their areas of responsibility.”**

—AN EXECUTIVE LEADER

# WE PROTECT OUR ASSETS & INFORMATION



LEAD WITH  
INTEGRITY



OWN IT ALWAYS

## WE USE COMPANY ASSETS RESPONSIBLY

Emergent invests in physical, electronic, and information assets (such as [intellectual property](#) and confidential information) that let us do our jobs. With these resources, we bring value to our stakeholders and gain a competitive advantage.

Our assets exist for valid business use only. To protect them from loss, damage, theft, waste, and improper use:

- Only sell, dispose of, or otherwise transfer assets with proper documentation and authorization.
- Make sure spending is authorized and supported by proper documentation.
- Do not use company resources for personal benefit.
- Prevent the misuse of copyrighted, trademarked, and contractual licensed property.

# WE PROTECT OUR ASSETS & INFORMATION



OWN IT ALWAYS



LEAD WITH  
INTEGRITY

## WE SAFEGUARD COMPANY INFORMATION

One of Emergent's most valuable assets is information about our business and the people we serve. We show responsible information management by:

- Understanding its content.
- Storing it in a proper location.
- Disposing of data that has no long-term value and no retention obligation.
- Limiting access, use, and disclosure of confidential information to people with valid business needs.

Always use good information control habits that:

- Reduce risks of losing or exposing information.
- Optimize the value of information.
- Align with Emergent's strategic goals and culture.
- Consider the full data life cycle (create, use, store, destroy).
- Benefit the entire organization. Avoid solutions that serve the needs of only a single business unit, function, or discipline.



## WE PROTECT OUR ASSETS & INFORMATION



### EMERGENT MAINTAINS THE CONFIDENTIALITY, INTEGRITY, AND AVAILABILITY OF INFORMATION BY:

- 1 Hosting our technology infrastructure in a secure environment. It complies with National Institute of Standards and Technology cybersecurity standards. We follow a routine audit schedule.
- 2 Using a third-party managed security service provider for our detection and response program. It has security incident event management and a security operations center. We can detect threats, confirm and respond to incidents, and conduct threat emulation scenarios.
- 3 Managing access controls and user verification with an identity access management tool.
- 4 Giving all employees and contractors training during onboarding, with annual retraining. Up-to-date security policy and procedure training covers information security awareness, phishing, and related risk topics, depending on role.
- 5 Requiring all employees, contractors, and vendors to follow policies and procedures for electronic communications and the protection of confidential and proprietary information.

# WE PROTECT OUR ASSETS & INFORMATION



OWN IT ALWAYS



LEAD WITH  
INTEGRITY

## WE RESPECT & PROTECT PRIVACY

Colleagues, business partners, customers, patients, and others entrust Emergent with personal information. And they expect us to keep it private. This may include names, identification numbers, home addresses, personal/business email addresses, IP addresses, and location data, as well as health, medical, genetic, and biometric data.

Emergent collects and uses personal information in a lawful, fair, legitimate, and ethical way. We only disclose personal information when:

- We have the authority to do so; and
- A valid business need exists; and
- We have followed all relevant data privacy laws.

Always protect information that can directly or indirectly identify people by following Emergent's privacy principles, which include:

1. Have a valid business need for it.
2. Collect only what you need.
3. Get and manage consent as required by relevant laws.
4. Use the information only for its collection purpose.
5. Apply safeguards and security to protect it.

To learn more, please see our [Privacy Policy](#).

# WE PROTECT OUR ASSETS & INFORMATION



LEAD WITH  
INTEGRITY

## WE KEEP ACCURATE BUSINESS RECORDS

Full, accurate, timely, and understandable disclosures about our business:

- Promote external stakeholder confidence.
- Meet our obligations to government agencies, regulators, and others.
- Allow us to make fact-based decisions that can lead to organizational efficiencies.

That's why Emergent maintains a strong internal financial control environment to ensure the integrity of financial records and public filings. We use good documentation practices to make sure our books, records, and accounts accurately and fairly reflect our business with an appropriate level of detail. We never:

- Conceal records in any way or make them confusing.
- Make false or misleading entries.
- Omit relevant information.
- Make an inaccurate representation in writing or verbally.
- Create any undisclosed or unrecorded funds or assets.

# WE PROTECT OUR ASSETS & INFORMATION



LEAD WITH  
INTEGRITY

You should:

- Prepare all records in a complete, clear, accurate, and timely way.
- Only sign documents you are authorized to sign and believe to be accurate.
- Only approve appropriately recorded funds or assets.
- Make payments with appropriate supporting documentation.
- Follow policies and procedures for reporting labor, time, and attendance.
- Cooperate with internal and external audits and related requests.

This goes for all business and financial records, including reports, test results, forms, timekeeping, etc.



# WE PROTECT OUR ASSETS & INFORMATION



LEAD WITH  
INTEGRITY



STAND  
SHOULDER TO  
SHOULDER

## WE AVOID CONFLICTS OF INTEREST

Emergent's business decisions should always be based on business interests, not personal interests. Our personal activities, investments, loyalties, and commitments cannot affect business decisions, objectivity, motivation, or performance—or even appear to affect them.

Actual, potential, or perceived conflicts may arise from:

- Hiring decisions or supervisory roles that involve family members, close personal friends, or anyone you have a romantic relationship with.
- Outside employment or serving as an officer, director, or board member of some organizations.
- Employing current or former government personnel and healthcare professionals, or engaging them to provide third-party services.
- Your personal activities, investments, loyalties, and commitments intersecting with your business activities.

Disclose any actual, potential, or perceived conflicts to the company as soon as you are aware of them and before you take part in activities that may cause a conflict. Your manager, Ethics & Compliance, or Human Resources can help. Potential conflicts will be assessed on a case-by-case basis to come up with a suitable resolution for managing them.

To learn more, please see our [Conflicts of Interest Policy](#).

# WE PROTECT OUR ASSETS & INFORMATION



LEAD WITH  
INTEGRITY

## WE USE EXTERNAL COMMUNICATIONS & SOCIAL MEDIA RESPONSIBLY

As a company, we use social media, blog posts, articles, and other external tools as a direct way to communicate:

- Disease state information.
- Corporate milestones.
- Scientific advancements.
- Other industry-related information.

When doing this, Emergent follows all applicable regulations and upholds high standards of integrity, respect, and transparency.

We have designated spokespeople who officially represent Emergent. This helps send a consistent and accurate message to the public, authorities, investors, and others. We also support participation from employees within an approval processes framework to make sure we:

- Avoid revealing sensitive or proprietary information.
- Are truthful, accurate and respectful.
- Are fair and unbiased.
- Comply with applicable laws and regulation.

## WE PROTECT OUR ASSETS & INFORMATION



Unless authorized to do so, you should not make statements or comments on behalf of Emergent. Your personal public opinions can only have a neutral, passing reference to our interests or business areas. Since advertising pharmaceutical products to the public is often not allowed outside the US, please do not post, share, or like any content that references our products without prior approval.

For more information, see our [Social Media Policy](#) or reach out to our Global Communications & Public Affairs team.



# 04

## WE COMPETE WITH INTEGRITY IN THE MARKETPLACE

**“You have to get the results.  
But how you get the results  
is just as important.”**

— A MARKETING DIRECTOR

# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



COMPETE  
WHERE IT  
COUNTS

## WE DO NOT TAKE PART IN BRIBERY, CORRUPTION, OR UNFAIR COMPETITION

A free enterprise market that rewards efforts based on merit and performance creates a fair field of competition. It can lead to higher quality products and more innovation. That is good for consumers, and it is good for us.



LEAD WITH  
INTEGRITY

Emergent believes we can succeed based on the quality of our products, the performance of our people, and the strength of our ideas. We never engage in bribery, corruption, or activities that could be perceived as improper influence. That goes for things we do directly or indirectly through a third-party service provider.

We also avoid any business practice that unfairly restricts trade or inhibits competition. We do not permit direct or indirect discussions with our competitors about:

- Business or marketing plans.
- Product prices.
- Confidential information.
- Competitive intelligence.

## WE PROTECT OUR ASSETS & INFORMATION



To follow these principles, you must not:

- Use money, personal benefits, or anything else of value to improperly influence the decisions of others or yourself.
- Seek confidential information about our competitors.
- Enter any anti-competitive agreements with anyone.
- Manipulate or give misleading information to gain a business advantage.
- Describe our products or those of competitors unfairly or inaccurately.

You may provide or accept modest hospitality as part of a valid business meeting with some stakeholders. However, hospitality limits vary by type of stakeholder and location, so refer to our [Gifts, Entertainment & Meals with External Stakeholders Policy](#) for specifics related to your activities before proceeding.

# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



LEAD WITH INTEGRITY

## WE FOLLOW GOVERNMENT TRADE CONTROLS

National and international authorities may govern the movement of specific technologies, goods, services, and information between countries and citizens. Emergent complies with all recognized:

- Trade, import, and export controls.
- Boycotts and sanctions.

To do this, we:

- Properly classify our products and services.
- Make all required import and export declarations.
- Comply with the terms and conditions of all import and export authorizations.
- Pay all duties, levies, and taxes associated with the import and export of our products and services.
- Screen our trade partners for reputability, making sure sanctions or other trade control restrictions do not apply to them.

Be sure to identify the end-users of our export-controlled products, technology, and information to avoid unlawful diversion or use for prohibited purposes. Do not export or disclose controlled technical information to anyone without proper authorization.

# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



LEAD WITH INTEGRITY



OWN IT ALWAYS

## WE WORK WITH ETHICAL THIRD PARTIES

The actions of our partners could reflect on us. Because of this, Emergent only works with outside parties committed to standards of ethics and integrity consistent with our own. That includes service providers, scientific partners, contractors, consultants, and other third parties. We select service providers based only on merit and ability to complete the job.

If you're authorized to work with third parties:

- Have a valid business need when procuring services from them.
- Conduct appropriate risk-based due diligence to confirm they meet our business and ethical standards.
- Have clear service specifications, as well as contracts or written service agreements, before they start work.
- Check their activities and behaviors during their work.
- Take action when they do not meet our business and ethical standards.
- Pay fair market value for their services, and only for work delivered.
- Report payments and other transfers of value made to healthcare professionals and organizations to [globalspendtransparency@ebsi.com](mailto:globalspendtransparency@ebsi.com). To learn more, see our [Global HCP/HCO Spend Transparency Policy](#).



# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



## EXTERNAL STAKEHOLDERS INCLUDE ANYONE INVOLVED IN OR AFFECTED BY OUR BUSINESS, INCLUDING:

- |                                 |             |
|---------------------------------|-------------|
| Government and public officials | Patients    |
| Healthcare professionals (HCPs) | Consumers   |
| Healthcare organizations (HCOs) | Advocates   |
| Clinical study participants     | Payers      |
| Scientific organizations        | Consultants |
| First responders                | Vendors     |
|                                 | Partners    |

# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



LEAD WITH INTEGRITY



OWN IT ALWAYS

## WE ENGAGE ETHICALLY WITH EXTERNAL STAKEHOLDERS

No matter the audience, Emergent always seeks to deliver truthful, non-misleading, unbiased, accurate, and balanced information. We avoid practices that may be seen as attempting to inappropriately influence judgment when it comes to recommending, purchasing, administering, and using our products and services.

Emergent engages governments and non-government organizations on public health policy in a responsible way. If you interact with external stakeholders such as government officials, healthcare professionals (HCPs), and healthcare organizations (HCOs), you represent Emergent and your colleagues. It's up to you to live up to our standards and values.

In all your interactions with external stakeholders:

- Have a clear and legitimate intent.
- Be truthful and accurate in your communications.
- Be transparent and disclose any funding or resources provided by Emergent to support their activities.

# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



LEAD WITH INTEGRITY



COMPETE WHERE IT COUNTS

## WE ADVERTISE & PROMOTE IN A FAIR & TRUTHFUL WAY

Putting people first means we want our products and services to be used by the right people, for the right reasons. Emergent has approval processes for communication materials used to support the promotion of our products, services, and capabilities, as well as non-promotional materials used to support scientific exchange and disease awareness. These processes make sure such materials:

- Comply with applicable regulations.
- Are appropriate for the intended audience.
- Have balanced, accurate, evidence-based information.
- Are of appropriate tone and taste.

Pharmaceutical product advertising and promotion is highly regulated. Requirements vary by geography, product type, and intended audience. Therefore, our product promotion approval processes also make sure that:

- Product claims are consistent with the most current approved product labeling.
- Materials present a balanced representation of the product's benefits and risks.
- Comparisons to other products are approved and meet all applicable standards.

# WE COMPETE WITH INTEGRITY IN THE MARKETPLACE



LEAD WITH  
INTEGRITY



COMPETE  
WHERE IT  
COUNTS

In all your external communications:

- Only use communication materials approved for the stakeholders you plan to interact with.
- Conduct non-promotional activities with clear separation from the promotion of our products.
- Do not conduct off-label promotion, make false claims, or mislead when it comes to our products.



**“Our company basically exists to help make the lives of people around the world better. And to give them peace of mind. That makes me feel good.”**

—A SENIOR DIRECTOR

# 05

**WE LIVE AS  
GOOD GLOBAL  
CITIZENS**

# WE LIVE AS GOOD GLOBAL CITIZENS



OWN IT ALWAYS



LEAD WITH INTEGRITY

## WE MAKE A DIFFERENCE THROUGH CORPORATE GIVING

Our mission to protect and enhance life goes beyond the products and services that Emergent delivers. Our corporate giving is intended to support external organizations and programs that align with our vision and mission. If they meet our criteria, they may receive:

- Charitable donations.
- Product donations.
- Sponsorships.
- Policy-focused contributions.
- Employee volunteers\*.

*\*We support employee volunteerism with paid volunteer time off during a normal scheduled work period.*

To expand scientific and clinical knowledge of our products, disease states, and therapeutic areas of focus, as well as public health threats in general, we also give medical education grants and externally sponsored scientific research grants.



LEAD WITH  
INTEGRITY

## WE ENSURE ALL GIVING IS ETHICAL AND TRANSPARENT

Emergent has independent approval processes for reviewing corporate giving for appropriateness based on the need, the recipient, and the process. We adhere to all relevant requirements related to public disclosure of grants and other forms of giving.

To avoid potential conflicts of interest, we always maintain the independence of third parties who receive corporate giving. We conduct giving activities transparently, ethically, and in line with all relevant rules and laws. Among other things, we never use giving:

- As an incentive to generate future sales.
- As an inducement to or reward for prescribing, recommending, dispensing, buying, supplying, approving, reimbursing, or administering a product.
- In exchange for advocacy or to influence a position.
- To improperly influence public or government officials, or any person or organization in a position to prescribe or recommend an Emergent product.



LEAD WITH  
INTEGRITY

## WE PARTICIPATE IN POLITICAL ACTIVITY RESPONSIBLY

Personal political activities should not create the perception that Emergent endorses or supports any political candidate or organization. When engaged in personal political activities, we may not use or provide any company resources without prior authorization from the SVP of Global Government Affairs. This includes equipment, materials, facilities, or employee support.

We should not directly or indirectly indicate we act on behalf of Emergent when engaged in personal political activities. Expenses related to personal political activities should not be submitted for reimbursement by Emergent.

Emergent has established the Emergent BioSolutions Inc. Employees PAC (EEPAC), a federal political action committee registered with and regulated by the Federal Election Commission (FEC). Federal campaign finance law and FEC regulations allow eligible employees to voluntarily pool their funds within EEPAC. EEPAC can then support federal candidates who advocate for the causes and goals of Emergent and its customers. We must never make coworkers feel coerced into supporting EEPAC, any political campaign, candidate, or organization. To learn more about EEPAC, please consult our [Political Activity Compliance Policy](#) or reach out to Federal Government Affairs.

Before engaging in any activity, consult the [Political Contributions Preclearance Policy](#) for information on how we comply with these laws. You may also contact Federal Government Affairs.



# WE LIVE AS GOOD GLOBAL CITIZENS



LEAD WITH INTEGRITY

Lastly, employees must be mindful of when activity may be considered lobbying in a particular jurisdiction. Interactions with government officials are highly regulated by the laws of the federal, state, local, or foreign jurisdiction of those officials. These laws vary significantly depending on jurisdiction and are constantly in flux. Global Government Affairs' role is to interact with these government officials on behalf of the company. Before engaging in any activity, we encourage you to consult Global Government Affairs and the [Policy on Lobbying Compliance](#) for guidance on this topic.

# WE LIVE AS GOOD GLOBAL CITIZENS



LEAD WITH  
INTEGRITY

## WE DO NOT TRADE ON INSIDE INFORMATION

Emergent believes that buying or selling stock based on material, non-public information gives an unfair advantage to the person who has the information.

In the course of your work, you may come across information about Emergent or our partners that the public does not know. You may not use that inside information to buy or sell securities. Do not disclose it to others so they can trade on it, either. And do not disclose it to third parties Emergent engages with.

# WE LIVE AS GOOD GLOBAL CITIZENS



LEAD WITH  
INTEGRITY

## WE FOLLOW TAX RULES

As good corporate citizens of the world, Emergent does not aid or condone tax evasion. Wherever we operate, we comply with all required tax laws, rules, regulations, and disclosure requirements related to:

- Corporate income tax.
- Customs duties.
- Excise taxes.
- Employment taxes.
- Indirect taxes (such as VAT and GST).
- Other relevant local taxes.

# WE LIVE AS GOOD GLOBAL CITIZENS



OWN IT ALWAYS



LEAD WITH INTEGRITY



STAND SHOULDER TO SHOULDER

## WE PROHIBIT HUMAN TRAFFICKING, CHILD LABOR, AND MODERN SLAVERY

Our mission to protect and enhance life goes beyond the products and services that we deliver. We act as good global citizens, which includes prohibiting engagement in human trafficking, child labor, or modern slavery. Opposing trafficking is not only the right thing to do, but it is also a requirement of U.S. government contractors.

To do your part:

- Promptly report any allegations or concerns of human trafficking, child labor, or modern slavery through any of our Speak Up channels.
- Review Emergent's [Combat Trafficking In Person Standard and Plan](#).

# WE LIVE AS GOOD GLOBAL CITIZENS



OWN IT ALWAYS



LEAD WITH INTEGRITY



STAND SHOULDER TO SHOULDER

## WE ACT IN A SUSTAINABLE, RESPONSIBLE WAY

It's not just what we do, but how we do it. Emergent seeks to protect and enhance life with mindful priorities for environmental, social, and governance (ESG) matters. These priorities improve long-term sustainability for our company, our communities, and external stakeholders.

Our environmental priorities consider the impact of resource consumption on the environment and the lives that live within it. Our social priorities consider how we interact with colleagues and within the communities where we work. Our governance priorities relate to practices and policies that lead to effective decision-making and legal compliance.

To do your part, during business activities:

- Take care of our world by striving to meet and exceed our environmental standards.
- Look out for colleagues and strive to amplify our impact where we do business.
- Follow our principles on diversity, equity, and inclusion, and respect human rights.
- Hold yourself and colleagues accountable for good corporate citizenship.

**WE ARE EMERGENT.  
AND WE PUT PEOPLE FIRST.**

We turn to Our Code for guidance. And we go to each other for help. If you have any questions, comments, or concerns related to Our Code, please reach out to a supervisor, senior management, Legal, Quality, Ethics and Compliance, or Human Resources. And never be afraid to [speak up](#), because your voice matters!



**OUR  
CODE**

For the lives we protect & enhance.