



General Statement

Corporate Responsibility

Introduction

Colorcon recognizes and honors its responsibility to operate in a fair and reasonable manner. It strives to maximize its business while at the same time protecting the interests of its owners, employees, suppliers and customers. Colorcon is committed to protecting the environment and to continually striving to reduce its environmental impact. This Statement and Guidelines may be amended by Colorcon from time-to-time.

Employee Rights

Child Labor

Colorcon does not use child or forced labor in any of its global operations or facilities. In the absence of any national or local law specifying a greater age, Colorcon defines “child” for the purposes of this policy, as being fewer than 15 years of age when the employment involves non-hazardous duties and as prescribed by the International Labor Organization (“ILO”) Convention 138, fewer than 18 years of age when the employment involves duties likely to jeopardize the health or safety of the youth.

Forced Labor

Colorcon does not use forced labor in any form (prison, indentured, bonded or otherwise).

Discrimination

Colorcon is an equal opportunity employer as a matter of law, ethics, and good business practice. It does not discriminate on grounds of race, color, religion, gender, national origin, age, disability, sexual orientation, political affiliation, union membership or any other status protected by law. Colorcon is committed to promoting diversity, equity, and inclusion among its employees. Using internal and external platforms, Colorcon engages employees in training on harassment, discrimination, and creation of a safe, inclusive working environment. Processes to report issues as well as whistleblower protection are covered in these trainings.

Remuneration and Working Hours

Colorcon pays workers according to applicable wage laws, including minimum wages, overtime, time off and legally mandated benefits, and complies with the laws on working hours in the countries in which it operates. Flexible working hours and remote working arrangements are available depending upon job role. Salary reviews are conducted periodically to ensure they are equitable. A bonus based upon economic performance is paid to all employees annually.

Recruitment, assessment, and career development

All employees are assessed on a yearly basis at minimum, which includes yearly objectives and career development plans. Recruitment for open positions is communicated internally via Colorcon’s internal intranet.

Freedom of Association

Colorcon respects the rights of workers, in accordance with local laws, to associate freely, join or not join labor unions, seek representation, and join workers’ councils.

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Safety of Operations

Colorcon provides a safe and healthy workplace, presenting no immediate hazards to employees including access to clean water and emergency healthcare to employees in the event of accidents or incidents at the workplace.

Colorcon's Global Environmental, Health and Safety (EHS) Programs involve a broad-based, proactive set of processes coupled with metrics for continuous improvement.

A Global Safety and Environmental Council is composed of members from each region in which Colorcon operates. The Global Council develops strategies, policies and overall goals for the organization. Each region also has its own local safety council to act on local issues and implement global initiatives. Employee empowerment is key among Colorcon's safety principles and equipment operators are aware that they can report problems and shut down equipment when needed.

United States Occupational Safety and Health Administration (OSHA) metrics are used to track and improve safety performance across all sites. Colorcon benchmarks against the industry in which it operates. Pareto analyses of any incidents are used to establish global improvement goals and programs. An annual safety award is given to the plant with the best overall performance in terms of OSHA metrics, safety programs and safety culture.

All sites have prevention programs in place, including fire prevention, emergency action, control of hazardous materials, hazards communication, confined spaces, personal protective equipment, ergonomics, materials handling, hot works and more.

A global safety team manages active pharmaceutical ingredient (API) approvals for use in the company's research and development (R&D) laboratories. The team defines the necessary safety equipment and facility improvements required for the handling of API. Procedures are in place for all aspects of API use including handling, inventory control, receiving and disposal. The status of any new API is reviewed by the team and all relevant information is collated in a globally available database.

A combustible dust hazards program has been implemented. Hazards information for all Colorcon product groups were reviewed and the results summarized in a dust safety booklet. This is available for customers, via the Colorcon website on the Regulatory & Compliance area. Dust safety is factored into new equipment and manufacturing designs and retrofitted into older facilities and equipment.

A behaviour-based safety program is implemented at all sites. This simple, peer-to-peer observation process, involves mini-audits at the shop floor level to engage all employees. A global database of findings is maintained, for trending and developing areas of future focus.

All process changes are reviewed by a multifunctional management team that includes quality, engineering, R&D, operations, logistics, and EHS professionals to ensure that safety and environmental consequences of changes are considered. All capital improvements proposed by Colorcon are reviewed in detail at the design stage and approval by an EHS professional is required.

Each site carries out a monthly training program with written safety modules, in which employees receive essential safety training, in their own local language.

All sites undergo a rigorous EHS inspection by Colorcon global personnel, at least once per year, which follows a common inspection format. This ensures that all sites are inspected by a team of auditors (not from the local site), so an outside perspective is given, and safety standards and practices are harmonized throughout the organization. Findings are prioritized and corrective action plans are implemented.

Colorcon's property insurance carrier plays an active role in risk management with biannual property risk reviews at every site. Principal findings are prioritized and reviewed for implementation in subsequent capital budgeting plans.

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A complete safety characterization is available for all Colorcon products. Colorcon uses only raw materials that have been assessed internally for safety. Complete safety information, including material safety data sheets (SDS), is available for review through the online Customer Service System (CSS).

Environmental

Energy Conservation

Since 2008, a multidisciplinary Energy & Resource Conservation Council has worked on reducing usage of energy and other resources. The main elements of the programs are:

- Procuring energy-efficient products and services through a careful and controlled review of options.
- Encouraging more energy- efficient working practices through education and engagement with Colorcon colleagues.
- Reviewing all existing energy consumption, obtaining professional guidance to examine the same, and then taking corrective, prioritized action to achieve reductions in usage.
- Designing new Colorcon facilities to include resource-efficient operations in such areas as HVAC, to compressed air, to lighting, to water usage. The corporate headquarters has been certified with Gold status under the Leadership in Energy and Environmental Design standards.
- Using best industry practices.
- Improved process cleaning practices, to clean more efficiently and use lower quantities of water and cleaning agents.

The foregoing activities have involved implementing heat recovery systems, more efficient lighting, motion-activated sensors instead of manual switches, building management systems to regulate energy usage, energy efficient motors, and reduced waste of compressed air.

Worldwide, these efforts have brought about a recurring annual savings of 1600 tons of carbon emissions, which amounts to taking 320 automobiles out of service.

Ethical Conduct

Every Colorcon employee is required to be contractually bound to honor a corporate “Code of Business Conduct.” This policy addresses a wide range of business practices including:

- Contact with competitors
- Receipt or offering of illegal payments or bribes
- Compliance with anti-boycott legislation-abiding with import/export controls
- Cooperation with governmental investigations
- Use of company funds for political contributions
- Protection of proprietary information

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Suppliers and Contractors

Selection of Suppliers

Colorcon aims to source materials and services from companies that operate ethically and responsibly. All new suppliers are qualified prior to being approved. The assessment process includes a review of business practices, as well as environmental compliance and management systems. Colorcon also conducts ongoing supplier audits, the frequency of which is based on a comprehensive risk-based analysis.

Security of Supply

A reliable and continuous supply of materials and services is vital to enable Colorcon's success in the marketplace. Colorcon operates a risk-based Business Continuity Program (BCP), one element of which is dedicated to uninterrupted supply of essential materials.

Product Quality

Maintaining the quality of Colorcon products and the raw materials used in production is essential to the success of the company. All Colorcon manufacturing sites have a detailed Quality Management System, most of which are ISO9001:2015 compliant and utilize modern manufacturing principles such as Lean and appropriate Good Manufacturing Processes.

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