

West Pharmaceutical Services

Tax Strategy

SCOPE:

West Pharmaceutical Services, Inc. (“West”) and its majority-owned subsidiaries which include West Pharmaceutical Services Cornwall Ltd., W.P.S.F. Limited and West Pharmaceutical Services Group, is a US-based corporation, incorporated under the laws of Pennsylvania, USA. West’s primary activity is the manufacturing and selling of packaging components and delivery systems for injectable drugs and healthcare products.

The West entities in the UK, including West Pharmaceutical Services Cornwall Ltd., W.P.S.F. Limited and West Pharmaceutical Services Group Limited (“West UK”) are incorporated under the laws of England and ultimately owned by West.

West UK is subject to the UK tax regime and has developed this UK Tax Strategy. The UK Tax Strategy applies to West and to West UK and is published to comply with paragraphs 19 and 25 of Schedule 19 to the UK Finance Act 2016. This Strategy is available for viewing on the West corporate web site (www.westpharma.com).

GOAL:

West’s Code of Business Conduct (“Code”) requires West to comply with all applicable laws in each jurisdiction in which it operates. The Code specifically provides an obligation to comply with all tax laws applicable to the global business of West. West is committed to full compliance with the Code and all statutory obligations and providing to tax authorities required information in a transparent and easily accessible manner. West manages its tax obligations with the same level of control as it manages all aspect of its business to ensure continuation of its global reputation as a financially sound organization.

Governance in relation to UK taxation:

- West’s Tax Strategy and compliance is the ultimate responsibility of West’s Board of Directors (“Board”)
- Audit Committee of the Board activities require monitoring of West’s financial reporting and internal controls on a global basis which also includes review of activities related to taxation
- Day to day tax activity is the responsibility of the Vice President (“VP”) of the Tax department located in Exton, Pennsylvania, USA. The VP of Tax reports to the corporate Senior Vice President, Chief Financial Officer and Treasurer (“CFO”) who is a member of the Senior Leadership Team and reports to the President and Chief Executive Officer (“CEO”) of West and Audit Committee of the Board.
- The VP of Tax attends quarterly Audit Committee meetings and presents as business dictates to this committee and to the full Board all material matters involving taxation and compliance.

- The Board ensures that tax implications are fully considered when reviewing potential investments and material capital commitments.
- The West tax department employs individuals who are highly qualified and experienced.

Risk Management:

The West tax department works closely with the local finance team within each jurisdiction where West has operations to ensure compliance with all local tax requirements, including the UK. As part of this process, the Tax department conducts quarterly meetings with regional Finance leadership to discuss material tax matters that may impact the local tax obligations. Additional meetings are held on an as-needed basis.

In addition, the corporate Tax department subscribes to several professional publications which are reviewed for tax law regulation changes which may impact West's tax obligation and or reporting requirements.

Furthermore, each local West affiliated company engages a professional service provider to ensure compliance with local tax regulations.

Lastly, West engages in an ongoing Enterprise Risk Management process that takes into consideration tax laws, tax planning and tax risks for all of its global affiliates.

Tax Planning Approach:

First and foremost, West's ultimate objective for tax management is to ensure compliance with all regulations within those jurisdictions where West transacts business. West will seek independent third party professional advice regarding tax planning activities. Once a strategy has been thoroughly developed and reviewed within the Tax department, then a recommendation is made to the CFO for endorsement and approval. In some instances, depending on the materiality of the strategy, the CFO may in turn request approval from the CEO of West and even the Board before proceeding.

Relationship with HMRC:

As with all local tax authorities, West UK works to have an open relationship with HMRC. As necessary, West UK communicates with HMRC to discuss any unusual activity which may be subject to uncertain interpretation. West UK reserves the right to contest tax authority positions if they are not believed to be consistent with applicable law, but before engaging in formal procedures, will first engage in meaningful discussions with the HMRC.

West and the diamond logo is a registered trademark of West Pharmaceutical Services, Inc., in the United States and other jurisdictions.