

Code of Business Conduct and Ethics Policy

Updated on October 25, 2022

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Maravai LifeSciences, Inc. ("Maravai" or the "Company") is engaged in a variety of activities that have the common goal of promoting the interests of its clients. The activities of the Company may be conducted in locations throughout the world and are often performed in conjunction with programs and contractual arrangements that involve other parties and organizations. The Company's reputation and relationships with outside organizations and individuals are often the product of long-standing relationships and/or substantial investments of the Company's resources, energies, and efforts. The Company therefore has a substantial interest in protecting its business ventures and activities.

It is the policy of Maravai to (i) require the highest standards of business ethics and integrity on the part of all its employees and (ii) to comply with all applicable laws and regulations in the conduct of its business. To that end, Maravai has adopted and implemented this Code of Business Conduct and Ethics Policy (this "Code") in order to deter wrongdoing and promote:

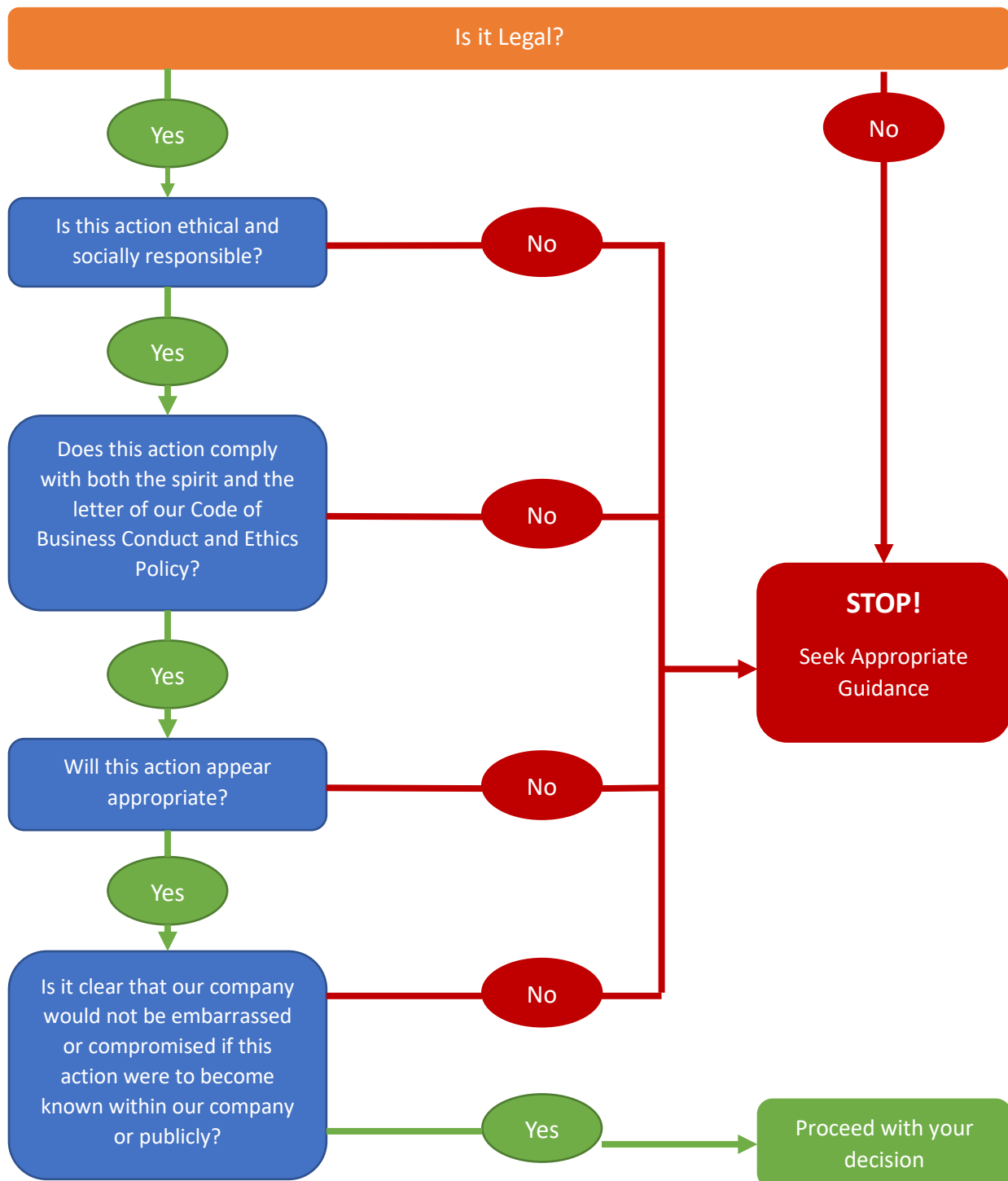
1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by the Company;
3. compliance with applicable governmental laws, rules and regulations;
4. the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
5. accountability for adherence to the Code.

This Code is also available on the Maravai Intranet under Resources Page/Policies and Handbook. Directors, officers and employees of the Company are responsible for reviewing this Code and certifying that he or she has reviewed and is in compliance with the Code. A copy of the certification is available on ADP and through your Human Resources (HR) representative.

Failure by an employee to comply with this Code will result in appropriate disciplinary action, which may include termination of employment. Unless the context requires otherwise, all references to "employees" in this Code shall also refer to officers of the Company.

Guidelines for Ethical Decision-Making

The goal of this Code is to describe the requirements we must follow and to help you make good business decisions. However, it does not – and cannot – cover every potential issue you may face. In addition to complying with the specific requirements set forth in this Code, in every situation, before taking any action, each director, officer and employee should ask themselves:



SCOPE

This Code applies to all Maravai's directors, officers and employees worldwide, including those of Maravai subsidiaries. The same high ethical standards apply to all, regardless of their job or level in the organization. In certain circumstances, this Code also applies to contractors and temporary colleagues. It is the responsibility of every colleague to be familiar with all policies and procedures relevant to their job functions.

NOTICE

This Code does not create a binding agreement between Maravai and any director, officer, employee, or any other person or entity to which this Code applies. This Code (as well as all other policies that the Company may adopt from time to time) may be amended unilaterally by the Company at any time.

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A. Compliance with Laws and Internal Policies

The Company requires that all directors, officers and employees comply, both in letter and spirit, with all laws, rules and regulations applicable to the Company in the cities, states and countries in which the Company operates or does business. Although not all directors, officers and employees are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

If you become aware of, or have reason to believe there has been, the violation of any law, rule or regulation by the Company, whether by its directors, officers or employees, you are expected to promptly report the matter to your supervisor, a member of the Company's Legal Department, or contact the Ethics Hotline (described further in Section R). Directors, offices and employees shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because he or she in good faith reports any such violation or belief.

In addition to laws and regulations imposed by local governments and regulatory bodies, the Company from time to time adopts its own policies and procedures. As in the case of laws, rules and regulations, you are also required to comply with the Company's internal policies and procedures, including, without limitation, the Insider Trading Policy in the employee handbook.

B. Conflicts of Interest

A conflict of interest occurs when an individual's private interest (or the interest of a member of his or her family) interferes, or gives the appearance of interfering, with the interests of the Company as a whole. A conflict of interest can arise when a director, officer or employee (or a member of his or her family) takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts of interest also arise when a director, officer or employee (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company.

While it is impossible to list all activities that could pose an actual or potential conflict of interest, the following are common examples:

- **Outside Business Interests:** Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with the Company, holding a second job or becoming involved with another business or organization that interferes with your ability to do your regular job.
- **Board Memberships:** Serving on the board of a competitor, customer, supplier, or other service provider.

- **Employment of Relatives and Friends:** Hiring a supplier, distributor, or other agent managed or owned by a relative or close friend.
- **Entertainment or Gifts:** Soliciting or accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, or customer.
- **Corporate Opportunities:** Taking personal advantage of corporate opportunities.

Loans by the Company to, or guarantees by the Company of, obligations of directors, officers, employees, or their family members are of special concern and could constitute improper personal benefits to the recipients of such loans or guarantees, depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of, obligations of any director or executive officer are expressly prohibited.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

Persons who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, the General Counsel.

Directors and executive officers must seek determinations and prior authorizations or approvals of transactions or relationships that could reasonably be expected to give rise to a conflicts of interest exclusively from the Audit Committee. For more information, see our Related Party Transactions Policy in the employee handbook.

C. Outside Business Interests

Employees are expected to give their full and undivided attention to their Company duties. They should not use Company facilities or their association with the Company to carry on a private business or other profession. The Company may waive this restriction, at its sole discretion, if the employee presents appropriate details regarding its non-interference with the employee's job duties and responsibilities. Employees shall not engage in a profit-making business, or become involved with a nonprofit organization, outside of their employment with the Company, if such business or organization:

- Provides goods, services or assistance to a competitor, customer or supplier of the Company; or
- Interferes with the employee's assigned duties at the Company.

No employee shall have a significant financial interest in a competitor, customer or supplier of the Company. In the absence of other facts and circumstances, a "significant" financial interest shall not include the passive investment of not more than 2% of the outstanding shares of a publicly-held company (provided the employee has no active participation in the business of such customer, supplier or competitor).

D. Corporate Opportunities

All directors, officers and employees owe a duty to the Company to advance the Company's interests when the opportunity to do so arises. Directors, officers and employees are prohibited from taking for themselves personally any opportunities that are discovered through the use of Company property, information, or position. Employees, officers and directors must advance the Company's legitimate interests when the opportunity to do so arises. This section is subject to any exemptions in the Company's current Certificate of Incorporation.

E. Protection and Proper Use of Corporate Assets

Directors, officers and employees should seek to protect the Company's assets. Theft, carelessness and waste have a direct impact on the Company's financial performance and are prohibited.

Directors, officers and employees must use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else. Any suspected incident of fraud or theft should be reported for investigation immediately.

The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any non-public financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

F. Acceptance of Costly Entertainment or Gifts

In general, Company directors, officers and employees and their relatives, may not request or accept payments of money or anything of value from any government officials, customers, suppliers or others with whom the Company does business, has done business, or may have occasion to do business. Restricted payments include, but are not limited to, any and all of the following:

- Compensation in any form (cash, kind, credit, etc.);
- Travel, transportation or lodging;
- Entertainment including, but not limited to, tickets to sporting and other events, business meals, and other business-related entertainment activity (golf, tennis, etc.) unless approved in advance by your supervisor or a member of the Company's Legal Department or ancillary to a legitimate business meeting attended by the person or company providing the entertainment; or

- Gifts of any kind, nature or description, including discounts, coupons and other offers not available to the public in general; provided, however, that employees may accept branded promotional items and annual holiday gifts (other than cash) having a reasonably estimated fair-market value of \$100.00 or less, provided the gifts are consistent with customary industry practices and applicable law and could not reasonably be construed as a bribe or payoff. For guidance on gifts that do not meet these criteria, please contact a member of Maravai's HR or Legal Department.

G. Anti-Corruption/Anti-Bribery

No employee, officer, agent, or independent contractor acting on Maravai's behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage. Making or receiving payments in the form of bribes, kickbacks or payoffs to or from government officials, customers, suppliers or others with whom the Company does business is strictly prohibited. Any such payments are improper, whether made or received directly or indirectly. In addition, any arrangements, which aid or abet another party in making or receiving such a payment, are improper. Improper payments need not be in the form of money. They may include nonmonetary gifts or the provision of services.

1. Government Officials

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. In addition to the provisions of this Code and other Maravai policies, employees and independent contractors working with the U.S. government, state or local governments, or governments of those countries where we operate or sell, have an additional obligation to know, understand and abide by the laws, regulations and ethical standards of those governments that may be more strict than those that apply to our non-government customers and suppliers.

Directors, officers and employees must never offer incentives to foreign or domestic government officials or agents in the hopes of influencing that individual. Under the U.S. Foreign Corrupt Practices Act ("FCPA"), the term "foreign official" refers to any person acting in an official capacity for any of the following:

- Any foreign government including any department, agency, military branch, court or legislature;
- Any partially or wholly-owned government entity, such as a nationalized corporation or industry;
- Any political party, including party officials or candidates;
- Employees of public international organizations (or any of their departments or agencies) such as The World Bank, the International Finance Corporation or the Red Cross; or

- Any member of a royal family.

Directors, officers and employees must never give gifts, gratuities or other payments directly or indirectly to domestic or foreign government officials in an effort to obtain or retain business for the Company or to obtain any special or unusual treatment in connection with a business transaction. Because the reason for a gift, gratuity, favor, or payment may be subject to misinterpretation, the Company prohibits any expenditures of any kind involving government officials without the prior explicit permission of a member of Maravai's Legal Department. Any such expenditure or transaction must be accurately recorded in the books and records of the Company, in accordance with the requirements of the Company's Chief Financial Officer.

2. Customer and Suppliers

Bribery and improper payments can also arise in situations that do not involve a government official. The exchange of appropriate gifts and entertainment is often a way to build our business relationships. However, you must conduct business with customers, suppliers, and government agencies (including U.S. and non-U.S. governments) without giving or accepting bribes including (but not limited to) commercial bribery and kickbacks.

- Commercial bribery involves a situation where something of value is given to a current or prospective business partner with the intent to improperly obtain business or influence a business decision.
- Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction.

The use of Company funds or assets for gifts, gratuities, or other favors to employees of other businesses, particularly customers or suppliers, to obtain an improper advantage is prohibited. A business courtesy, such as a gift or entertainment, should never be offered under circumstances that might create the appearance of an impropriety. You may not furnish or offer to furnish any gift that is of more than token value or that goes beyond the common courtesies associated with accepted business practices. Our suppliers and customers likely have gift and entertainment policies of their own. You must be careful never to provide a gift or entertainment that violates the other company's gift and entertainment policy. Giving or receiving any payment or gift in the nature of a bribe or kickback is absolutely prohibited.

H. Political Contributions

Political contributions to U.S. federal election campaigns made from Company funds are prohibited. The legality of political contributions to state, local or foreign campaigns or causes must be determined on a jurisdiction-by-jurisdiction basis and, therefore, must be approved in advance by a member of the Company's Legal Department. Political contributions include any donation, gift, or loan of Company funds, assets, or property to or for the benefit of any political party, political committee, or candidate committee, and any use of Company funds, assets, or property to oppose or to support any candidate. This includes: (a) donations, gifts,

or loans of funds, assets or property which are made by employees or third persons, such as agents, or consultants, who are reimbursed in any way by the Company; (b) the uncompensated use of Company services, facilities, or property; and (c) loans, loan guarantees or other extensions of credit.

I. Honest and Ethical Conduct and Fair Dealing

The Company's policy is to exhibit and promote high standards of integrity by conducting its affairs honestly and ethically, including acting in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing your independent judgment to be subordinated.

Each director, officer, and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job. Employees, officers and directors should at all times deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees. Statements regarding the Company's products and services or otherwise must not be untrue, misleading, deceptive, or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

J. Maintaining Accurate Financial Records/Internal Accounting Controls

Accurate and reliable records are crucial to our business and are essential to the Company's ability to meet legal and regulatory obligations. The Company is committed to maintaining accurate company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business.

Each employee is responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. All company records must be complete, accurate, and reliable in all material respects. Employees must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. There is never a reason to make false or misleading entries.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading

entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation. We also need to ensure that the Company's records are made secure and readily available to those with a need to know the information on a timely basis.

The following are examples of activities not allowed:

- Maintaining undisclosed or unrecorded funds or assets for any purpose;
- Making, or asking others to make, false, misleading, or artificial entries on an expense report, time sheet or any other report;
- Giving false quality or safety results;
- Recording false sales or recording sales outside of the time period they actually occurred;
- Understating or overstating known liabilities and assets;
- Delaying the entry of items that should be current expenses;
- Hiding the true nature of any transaction; and
- Providing inaccurate or misleading information for company benefit programs.

It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and in other public communications.

No director, officer or employee shall, directly or indirectly, make or cause to be made a materially false or misleading statement to an accountant in connection with (or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading to, an accountant in connection with) any audit, review or examination of the Company's financial statements or the preparation or filing of any document or report with the SEC. No director, officer or employee shall, directly or indirectly, take any action to coerce, manipulate, mislead, or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of the Company's financial statements.

Additionally, Senior Financial Officers are subject to, and required to agree to be bound by, the Company's Code of Ethics for Senior Financial Officers as set forth in Appendix 1.

Employees with concerns regarding questionable accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters may confidentially (to the extent legally permitted), and anonymously if they wish, submit such concerns or complaints in writing to the Company's Legal Department or may use the Company's Ethics Hotline ((866) 860-0008 (English) or (800) 216-1288 (Spanish) or by email to reports @lighthouse-services.com (must include the Company's name with the report)).

For more information, see Section R “Reporting and Investigation of Violations.” All such concerns and complaints will be forwarded to the Audit Committee of the Board of Directors. The Audit Committee will evaluate the merits of any concerns or complaints referred to it by a member of the Company’s Legal Department and Chief Executive Officer and authorize such follow-up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint.

The Company will not discipline, discriminate against, or retaliate against any employee who reports in good faith a complaint or concern regarding accounting or auditing matters.

K. Disclosure

The Company’s periodic reports and other documents filed with the SEC and other regulators, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules, along with other public communications made by the Company.

Each employee who contributes in any way to the preparation or verification of the Company’s financial statements and other financial information must ensure that the Company’s books, records, and accounts are accurately maintained. Each employee must cooperate fully with the Company’s accounting and internal audit departments, as well as the Company’s independent public accountants and counsel.

Each employee who is involved in the Company’s disclosure process must:

1. be familiar with and comply with the Company’s disclosure controls and procedures and its internal control over financial reporting; and
2. take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

L. Confidentiality

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to the Company’s competitors, or harmful to the Company or its customers if disclosed. Confidentiality obligations may be set forth in an Employee Invention Assignment and Non-Disclosure Agreement (or similar document) employees sign in connection with their employment.

M. Export/Import Control Awareness

Exports and imports are a significant part of the operations of Maravai. Federal law

prohibits transactions with certain persons or entities that have violated export-related laws or are believed to pose a threat to national security. Additionally, doing business with certain countries may result in imposed economic sanctions. Adherence to export/import control laws and regulations is essential to maintaining the privilege of engaging in international commerce. Failure to comply may subject Maravai and its employees to penalties, fines, imprisonment, and loss of export privileges, as well as adverse publicity.

Therefore, it is important that we comply with all export/import control laws and regulations pertaining to our operations. Maravai must conduct all of its export-related and import-related activities, including sales and shipments of products and transfers of technology, in a manner intended to satisfy its obligations under export/import laws and regulations of the United States and of other countries in which it is engaged in business.

Export control laws apply to more than simply shipping products and spare parts to different countries. They also apply to technology and information communicated to people in or from other countries, or who represent organizations located in certain countries. Thus, an export may occur not only when items are shipped or carried to another country, but also via a telephone conversation, fax, or email, or during a sales or technical presentation, a facility visit, or any other access to technology by a citizen of another country (including our own employees).

Those who are involved in international sales, or in processing or shipping international orders, or in transmitting technical information need a more detailed understanding of export/import control regulations and must perform due diligence before any transaction that has an international element to determine whether such parties are on the U.S. government's restricted list. If you have any questions, contact a member of the Company's Legal Department.

N. Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Maravai and individuals to severe sanctions. Our company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

Our company will not condone, facilitate, or support money laundering. Two areas that deserve special awareness are unusual ways in which payments may be requested and customers who appear to lack integrity in their operations. Be alert for:

- Requests for cash payment, travelers checks or checks from an unknown third party;
- Complex payment patterns;
- Unusual transfers to or from countries not related to the transaction;
- Customers who seem eager to avoid recordkeeping requirements;
- Transactions involving locations previously associated with money laundering or tax evasion; and
- Transactions which are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity.

O. Maintaining Free Competition

U.S. federal and state antitrust laws, as well as international competition laws, prohibit various practices that could limit competition or restrict fair trade. Under these laws, companies may not enter into agreements with other companies, however informally, that unreasonably restrict competition. Some examples of prohibited agreements include: an agreement with competitors to charge customers the same price for products or to divide markets or service territories (i.e., to divide customers); an agreement with suppliers not to sell to the company's competitors; or forcing any customer to buy an item or service as a condition of buying another item or service. Accordingly, employees are expected to be sensitive to the possibility of legal concerns under competition laws which are more fully described in Maravai's Antitrust Policy and direct any questions or concerns to either your supervisor or a member of the Company's Legal Department.

P. Environmental Protection

Maravai is committed to satisfying all environmental regulatory compliance requirements and has an established Environmental, Health and Safety (EHS) Policy in the employee handbook. Employees are expected to comply with environmental regulations and maintain Maravai's standards of full compliance with the law. Any questions regarding environmental issues should be directed to the appropriate environmental health & safety personnel in San Diego, CA.

Q. Administration and Interpretation

Considering the complexity of this Code, and the determination of the Company's management and Board of Directors to comply with both the letter and spirit of all applicable laws and regulations, it is recognized that questions of interpretation will arise. All questions relating to this Code are to be addressed to your supervisor who shall consult with members of management or the Company's HR or Legal Department, as appropriate.

R. Reporting and Investigation of Violations

Allegations of actions prohibited by this Code that involve directors or executive officers must be reported to the Audit Committee.

Allegations of actions prohibited by this Code that involve persons other than directors and executive officers must be reported to the reporting person's supervisor or the General Counsel.

The Company encourages direct reporting of actions prohibited by this Code as set forth above. Alternatively, allegations of actions prohibited by this Code may be reported through its Ethics Hotline by phone at (866) 860-0008 (English) or (800) 216-1288 (Spanish) or by email to reports @lighthouse-services.com (must include the Company's name with the report).

After receiving a report of an alleged prohibited action, the Audit Committee or the General Counsel, as applicable, must promptly take all appropriate actions necessary to investigate.

All directors, officers, and employees are expected to cooperate in any internal investigation of misconduct.

S. Prohibition on Retaliation

The Company does not tolerate acts of retaliation against any director, officer, or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, and any such retaliation may be a violation of the Company's Whistleblower Policy in the employee handbook.

T. Enforcement

The Company must ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board.

If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor determines that a violation of this Code has occurred, the supervisor will report such determination to the General Counsel.

Upon receipt of a determination that there has been a violation of this Code, the Board or the General Counsel will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

U. Waivers of this Code of Business Conduct and Ethics Policy

The Board or the Audit Committee (in the case of a violation by a director or executive officer) or the General Counsel (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code.

Any waiver for a director or an executive officer shall be disclosed as required by SEC and Nasdaq rules.

MARAVAI LIFESCIENCES HOLDINGS, INC.

CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

Maravai LifeSciences Holdings, Inc. (the “Company”) maintains the Code of Ethics (the “Code of Ethics”) applicable to all employees of the Company. The Chief Executive Officer and the Chief Financial Officer, the principal accounting officer, the controller and all persons performing similar functions (collectively, the “Senior Financial Officers”) are bound by the provisions set forth therein relating to ethical conduct, conflicts of interest and compliance with law. In addition to the Code of Ethics, each Senior Financial Officer is subject to the following additional Code of Ethics for Senior Financial Officers (this “Code”):

- I. Each Senior Financial Officer shall exhibit and promote the highest standards of honesty and ethical business conduct, including acting in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated. Each Senior Financial Officer shall establish, maintain and support policies and procedures that encourage and reward professional integrity in all aspects of the Company’s organization and shall ensure an environment exists within the Company that eliminates inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal or alienation from other employees within the Company.
- II. Each Senior Financial Officer is responsible for full, fair, accurate, timely and understandable disclosure in the reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and other regulators, and in other public communications made by the Company. Accordingly, it is the responsibility of each Senior Financial Officer to (a) promptly bring to the attention of the General Counsel or the Audit Committee any material information of which he or she may become aware that affects the disclosures made by the Company in its public filings and (b) otherwise assist the General Counsel or the Audit Committee, as applicable, in fulfilling the responsibilities as specified

in the Company's policies and procedures regarding financial reporting and disclosure.

- III. Each Senior Financial Officer shall promptly bring to the attention of the General Counsel or the Audit Committee any information he or she may have concerning (a) significant deficiencies or material weaknesses in the design or operation of internal controls, which could adversely affect the Company's ability to record, process, summarize and report financial information, or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.
- IV. Each Senior Financial Officer shall promptly bring to the attention of the General Counsel and the Audit Committee any information he or she may have concerning any violation of the Company's Code of Ethics, including any actual or apparent conflicts of interest between personal and professional relationships, involving any management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.
- V. Each Senior Financial Officer shall endeavor to comply with all securities and other laws, rules and regulations of federal, state and local governments and other private and public regulatory authorities that are applicable to the Company and its operations. Each Senior Financial Officer shall promptly bring to the attention of the General Counsel and the Audit Committee any information he or she may have concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to the Company and the operation of its business, or of a violation of the Code of Ethics or of a violation of this Code.
- VI. The Board of Directors shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of the Code of Ethics or this Code by a Senior Financial Officer. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code of Ethics and to this Code, and shall include written notices to the individual involved that the Board of Directors has determined that there has been a violation, censure by the Board of Directors, demotion or re-assignment of the individual involved, suspension with or without pay or benefits and termination of the individual's employment or such other action as the Board of Directors may determine is appropriate under the circumstances. In determining what action is appropriate in a particular case, the Board of Directors or such designee shall take into account all relevant information, including the nature and severity of the

violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other ethical or financial reporting violations in the past.

- VII. The Board of Directors or a committee thereof shall consider any request by a person subject to this Code for a waiver or any amendment to this Code or the Code of Ethics. All such waivers or amendments shall be disclosed promptly as required by law, rule or regulation.

- VII. Each Senior Financial Officer will annually sign a certification form indicating compliance with this Code.

MARAVAI LIFESCIENCES HOLDINGS, INC.

CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

CERTIFICATION

Certification Period: _____ to _____.

I have read and understand the Maravai LifeSciences Holdings, Inc. (the “Company”) Code of Ethics for Senior Financial Officers.

I certify that, to the best of my knowledge and information, I have no reason to believe that there is or has been during the certification period a violation of the Company’s policies as to conflicts of interest and ethical business conduct, as summarized in the Company’s Code of Ethics for Senior Financial Officers, except as to issues of which I have personal knowledge that have been referred to the Company’s General Counsel for review. If there are any such exceptions, I have within the last week personally verified with the General Counsel that each such exception issue is under active review or has been resolved.

Signature

Typed or Printed Name

Date