



**CODE OF BUSINESS CONDUCT
AND ETHICS POLICY**

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1. CODE OF BUSINESS CONDUCT AND ETHICS POLICY

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 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 (the "Code").

This Code is also available on the Home Page of ADP Workforce Now (<https://workforcenow.adp.com>). All directors, officers and employees of the Company are responsible for reviewing this Code and certifying annually 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 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.

SCOPE

This Code applies to all Maravai's directors, officers and employees worldwide, including employees of Maravai subsidiaries.

NOTICE

This Code does not create a binding agreement between Maravai and any employee, director or officer, or other person or entity. 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.

A. Compliance with Laws and Internal Policies

The Company requires that all employees, officers and directors comply with all laws, rules and regulations applicable to the Company wherever it does business. 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 officers, employees or directors, 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 Appendix A). Employees, officers and directors 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 and regulations, you are also required to comply with the Company's internal policies and procedures.

B. Conflicts of Interest

All directors, officers and employees are required to avoid any relationship with other individuals or organizations that might impair, or even appear to impair, the proper performance of their Company-related responsibilities. Directors, officers and employees must avoid any situation that might affect their independence of judgment with respect to any business dealings between the Company and any other organization or individual. Any employee who believes that he or she may have such a conflict, whether actual or potential, must report all pertinent details to his or her supervisor or a member of the Company's Legal Department. Any director or officer who believes that he or she may have a conflict of interest, whether actual or potential, must report all pertinent details to the Company's Legal Department.

If you become aware of a conflict involving another person in the Company, whether actual or potential, you should report all pertinent details to your supervisor, your head of Human Resources, or a member of the Company's Legal Department.

A conflict of interest situation can arise in many ways, some of which are set forth below.

1. Related-Party Transactions

Related-party transactions are those in which the parties do not deal with one another at arm's length. They include, but are not limited to, any employee of the Company who is in a position to influence a business transaction between the Company and: (1) an individual who is his or her spouse, child, sibling, parent, partner, present, personal friend or former close business associate; (2) a non-Company organization for which he or she currently serves as an

officer, trustee or partner, or for which he or she has recently served in such capacity; or (3) any individual or organization with whom he or she is negotiating, or with whom he or she has an arrangement, concerning prospective employment.

The Company should avoid related-party transactions. If any employee believes that a related-party transaction exists or might occur, he or she must make full disclosure to his or her supervisor. After such full disclosure, the existing or potential conflict will be reviewed by the supervisor, and a decision will be made about whether the related-party transaction is appropriate, and whether the Company should proceed with the transaction. In the case of a material related-party transaction, the supervisor must report the matter to the Company's Chief Financial Officer.

2. 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 profession. The Company may waive this restriction, at its sole discretion, if employee presents appropriate details. Employees shall not engage in a profit-making business, or become involved with a nonprofit if organization, outside of their employment with the Company, if such business or organization:

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

No employee shall have a financial interest in a competitor, customer or supplier of the Company, other than (x) less than 1% of the outstanding shares of a publicly-held company (with respect to a customer, supplier or competitor) or (y) less than 5% of the outstanding shares of a privately-held company (with respect to a customer or supplier only).

No director may perform services as a consultant, employee, officer, director or advisor or in any other capacity for a competitor of the Company. No director shall have a financial interest in a competitor, customer or supplier of the Company, other than (x) less than 1% of the outstanding shares of a publicly-held company (with respect to a customer, supplier or competitor) or (y) less than 5% of the outstanding shares of a privately-held company (with respect to a customer or supplier only).

C. Acceptance of Costly Entertainment or Gifts

In general, Company employees, officers and directors, 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.
- 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 this criteria, please contact a member of the Company's Legal Department.

D. Improper Payments, Gifts and Gratuities

1. Customer and Suppliers

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.

2. Government Officials

Employees, officers and directors must never offer incentives to foreign or domestic government officials or agents in the hopes of influencing that individual. Employees, officers and directors 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.

E. 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.

F. Honest and Ethical Conduct and Fair Dealing

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.

G. Accuracy of Books and Records and Public Reports

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

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.

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 Securities and Exchange Commission ("SEC") and in other public communications.

H. Concerns Regarding Accounting or Auditing Matters

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 (within the U.S. at 1-866-860-0008). See "Ethics Hotline." 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.

I. Dealings with Independent Auditors

No employee, officer or director 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 employee, officer or director 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.

J. Trade Secrets and Confidentiality

Employees, officers and directors must maintain the confidentiality of confidential information (defined as nonpublic information from which the Company or other third party derives value and hereafter referred to as "Confidential Information") entrusted to them by the Company or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited.

The protection of confidential, sensitive, and proprietary information is of critical importance to Maravai, its workforce, and its clients. "Confidential Information" means any company proprietary information, trade secrets or know-how, including, but not limited to, Company data, contracts, products, inventions, trade secrets, know-how, systems, formulas, processes, compositions, manufacturing techniques, machinery, equipment, research projects, drawings, models, data processing and computer software techniques, programs and systems; scientific formulas, solutions, procedures, results, records, notebooks, summaries, calculations; customer information and lists, price lists, costs, sales, sales volume or strategy, profitability, plans; documents, business records, promotional materials, marketing information, pricing information and strategies; quotes, backlog, orders inventory, expansion or acquisition or divestiture plans or strategy; information about Company operations, employee compensation,

computer programs, marketing materials or strategies; Company's customer lists and prospective customer lists (including the names, addresses, telephone numbers and account numbers of Company's customers, Company's trade history with each customer, and all other information on Company's customer and prospective customer lists); vendor lists and all other information regarding Company's vendors, licenses, distributors, strategic partners, and suppliers; training materials, policies and procedures, methods, processes, techniques, and expertise; Company financial information; and all concepts, plans, proposals or information about the Company's current, future and proposed business, and/or any other information and records obtained or developed by the Company in the course of its business operations, without regard to the oral, written, digital, or other form of the Confidential Information, and without regard to the manner of preparation, transmittal, or storage of the Confidential Information, including but not limited to physical devices or materials, electronic devices or media, magnetic media, optical media, or any other method, means, or medium, or other business information disclosed to employees by the Company either directly or indirectly in writing, orally or by drawings, or by observation. It is therefore essential that all employees take steps to safeguard such information and hold it in the strictest confidence. Employees must not use any Confidential Information of the Company in any manner that is unauthorized or detrimental to the best interests of the Company. Employees who improperly acquire, use or disclose any Confidential Information are subject to disciplinary action, up to and including termination.

Further, during their employment with the Company, employees are strictly prohibited from using or disclosing any confidential information or trade secrets of any former employer or other person or entity, or bringing onto the premises of the Company any proprietary information belonging to any such employer, person or entity unless consented to in writing by such employer, person or entity.

If employees receive from third parties their confidential or proprietary information subject to a duty on the third party's part to maintain the confidentiality of such information and to use it only for certain limited purposes, employees must hold all such confidential or proprietary information in the strictest confidence and not disclose it to any person, company, corporation or other entity, except as necessary in carrying out their work for Maravai consistent with Maravai's agreement with such third party.

You may receive inquiries from third parties for information concerning the Company. Employees (other than the Company's officers and other authorized spokespersons) must not discuss or disseminate the Company's Confidential Information to any third party, such as customers, suppliers or potential competitors, except as required in the performance of his or her duties and after an appropriate confidentiality agreement is in place. If you receive inquiries from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders, you must decline to comment and refer the inquirer to your supervisor or one of the Company's authorized spokespersons.

All materials, data, work products, results, reports and any other information that employees receive, generate, derive or provide to the Company as part of or about the performance of employment hereunder shall be and remain the Company's proprietary information.

At the time of leaving the employ of the Company, employees must deliver to the Company (and will not keep in their possession, recreate or deliver to anyone else) all records, data, reports, proposals, lists, correspondence, specifications, drawings, blueprints, sketches, materials, equipment, other documents or property, or reproductions of any aforementioned items developed by the employee pursuant to his or her employment with the company or otherwise belonging to the Company. This duty of confidentiality applies during and even after employment with Maravai.

You also must abide by any lawful obligations that you have to any former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

K. Protection and Proper Use of Corporate Assets

Employees, officers and directors should seek to protect the Company's assets. Theft, carelessness and waste have a direct impact on the Company's financial performance. Employees, officers and directors 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.

Employees, officers and directors must advance the Company's legitimate interests when the opportunity to do so arises. You must not take for yourself personal opportunities that are discovered through your position with the Company or the use of property or information of the Company.

L. The Government as a Customer

In addition to the provisions of this Code and other Maravai policies, employees 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.

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.

M. Export/Import Control Awareness

Exports and imports are a significant part of the operations of Maravai. 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. If you have any questions, contact a member of the Company's Legal Department.

N. 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.

O. Environmental Protection

Maravai is committed to satisfying all environmental regulatory compliance requirements and has an established Environmental, Health and Safety (EHS) Policy. 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.

P. 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 Legal Department, as appropriate.

Q. Waivers of this Code of Business Conduct and Ethics

While some of the regulations contained in this Code must be strictly adhered to and no exceptions can be allowed, in rare cases exceptions may be possible. Any employee who believes that an exception to any of these policies is appropriate and, in the Company's, best interest in his or her case should first contact his or her supervisor. If the supervisor agrees that an exception is appropriate, the approval of the CEO must be obtained.

Any officer or director who seeks an exception to any of these policies should contact the Company's Legal Department. Any waiver of this Code for officers or directors or any change to this Code that applies to officers or directors may be made only by the Board of Directors of the Company and will be disclosed as required by law or stock exchange regulation.

R. Ethics Hotline

Any employee of Maravai who observes or suspects a violation of any law, regulation, or this Code of Business Conduct and Ethics, should contact a member of the Company's Legal Department or use Maravai's Ethics Hotline. Specific information related to the Ethics Hotline may be found in the Ethics Hotline Policy.

Employees who have any questions regarding this policy should contact the President or the CEO.

2. MARAVAI ETHICS HOTLINE POLICY

A. Purpose

Maravai is committed to compliance with the laws that affect the conduct of our business and to the highest standards of business ethics and integrity. In conjunction with this commitment and Maravai's commitment to open communication, Maravai has instituted an Ethics Hotline for all Maravai employees to use to report conduct that might involve illegality or other violations of the Maravai Policies and Procedures. Maravai aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required then they should follow our existing grievance procedure.

B. Scope

Ethics Hotline availability to Maravai employees, including part time, temporary and contract employees.

C. Procedures

If an employee observes or suspects a violation of a law or regulation or other elements of the Maravai Policies and Procedures, the employee should contact the Ethics Hotline and report in either of the following ways:

- English speaking USA and Canada: 866-860-0008
- Spanish speaking USA and Canada: 800-216-1288
- Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish or French
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax alternative for written documents: 215- 689-3885 (must include company name with report)

Reporters to the hotline will have the ability to remain anonymous if they choose. The earlier a concern is expressed, the easier it is for the company to take action. Although you are not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern. Malicious allegations may result in disciplinary action. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting, and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation because of the information you have

provided. Reports are submitted by Lighthouse to Maravai, or its designee, and may or may not be investigated at the sole discretion of our company.

Callers to the Ethics Hotline should be prepared to describe the situation as completely as they can, including dates, names, facilities and/or departments involved, and names of other employees who would provide additional information. Callers should contact the Ethics Hotline even if they do not have all of the facts or if they are unsure if there is a problem. The Ethics Hotline staff, in conjunction with the Maravai's Human Resources and Legal Department, will look into the information provided, attempt to verify it, and take appropriate action.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor or Human Resources.

All concerns and complaints about accounting or auditing matters will also be forwarded to the Audit Committee of the Board of Directors. The Audit Committee will evaluate the merits of the concern or complaint and authorize such follow up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint.

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation

Whether reported directly to Maravai LifeSciences personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- * Acknowledging that the concern was received;
- * Indicating how the matter will be dealt with;
- * Giving an estimate of the time that it will take for a final response;
- * Telling them whether initial inquiries have been made;
- * Telling them whether further investigations will follow, and if not, why not.

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

At the discretion of the company, and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.

Contact the Ethics Hotline to report possible violations related to, among other things:

Accounting or Auditing Matters
Antitrust Laws

Conflicts of Interest
Environmental Laws
Export/Import Laws
Food and Drug Laws
Fraudulent Transactions
Health and Safety Laws
Government Contracts Laws
Political Contributions
Insider Trading and Other Securities Laws
Theft, Bribes, and Kickbacks
Maravai LifeSciences Code of Business Conduct and Ethics