



CODE OF CONDUCT



Dear Colleagues,



Each day we make decisions that must be legally and ethically responsible and we have a duty to ensure integrity in our daily work. To help guide this decision making in our business activities, we have developed the Ascensia Code of Conduct.

The Code supports our mission to empower people living with diabetes through innovative solutions that simplify and improve their lives. To be a trusted partner in the diabetes community, we must observe the principles of this Code. By applying them, every employee should have the confidence that they are doing the right thing and acting with integrity.

In addition to helping us to serve patients, following this guidance will ensure that we protect our organization and each of us as individuals. Together, we can contribute to the success of the company by implementing this Code to reduce risk to our business, prevent issues and address concerns as they arise.

Kind regards,

A handwritten signature in black ink, appearing to read 'Michael Kloss', written in a cursive style.

Michael Kloss
President and CEO, Ascensia Diabetes Care

THE ASCENSIA CODE OF CONDUCT

Applicable to all countries and employees, the Ascensia Code of Conduct provides general guidance and principles on how we must operate as a business globally. Ascensia expects our business partners to also live up to these standards and follow the principles of this Code. It is organized by compliance areas and highlights the major risks for our business and our key principles for acting in an ethical and compliant manner. This code cannot and is not intended to cover every possible case and situation we may encounter.

On top of this Code, applicable Ascensia global and local policies and procedures, as well as local, national, regional and/or international rules, regulations and industry associations codes of conduct, must be applied and adhered to where required for any specific given situations.

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ANTI-CORRUPTION



WHAT IS CORRUPTION?

Corruption is the illegal conduct of offering, promising or giving (i.e. actively) a benefit to influence the actions or decision making of an individual or organization, commonly related to when they are in a position of trust (e.g. governmental officials). It can take different forms, including kickbacks and bribery. Passive corruption/bribery, also generally subject to sanctions, refers to the offence committed by the person who solicits, accepts or receives the bribe. Hence, active corruption/bribery occurs on the supply side, while passive corruption/bribery on the demand side.

WHY IS THIS IMPORTANT?

Ascensia does not tolerate any kind of corruption or bribery as these actions are illegal and in direct conflict to our company's mission, vision and values, and undermine our integrity. Ascensia's reputation and sustainability as a trusted partner within the diabetes community can only be maintained if every employee does the right thing – there is never a justification for partaking in illegal business practices. Ascensia will not (and expects our business partners not to) pursue any business opportunity that involves any form of corruption, bribery or granting of any other improper advantages.

OUR CODE ON ANTI-CORRUPTION

- We never **offer or provide** a benefit that is intended to (or may give the appearance of intending to) wrongfully influence the outcome of an individual's or organization's decision. "Wrongfully influence" describes the intention to cause the recipient of a benefit to misuse his/her position and supply the provider of the benefit with an inappropriate advantage.
- We assess and handle carefully those **benefits** that may be seen as bribes or providing improper advantage, which may include:
 - Cash, gift cards or other cash equivalents
 - Gifts, meals, travel or hospitality
 - Special invitations to entertainment events
 - Employment and business opportunities
 - Personal favors
 - Charitable donations
 - Free or discounted products, etc.
- We do not **use another person** or entity (e.g. third party business partner, family member) to offer or provide a benefit that an employee would not have been allowed to offer or give themselves.
- We may **accept**, in limited situations, unsolicited and modest gifts, hospitality or meals for instance, as long as there is no conflict of interest or perception of wrongful influence. The gift or hospitality must comply with all applicable laws, rules and industry codes on handling of benefits.

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- We only do business with reputable **third parties** who engage in legitimate business activities and do not engage in business relationships with individuals or entities that have been involved in corruption or money laundering or have been sanctioned for having a past or ongoing association with criminal or terrorist activities.

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- Specific and stricter rules, industry codes and Ascensia policies do apply to interactions with **healthcare professionals ("HCP")**. As an overarching principle, nothing shall be offered to an HCP intended to have an inappropriate influence on the HCP's decision and induce the latter to prescribe, dispense, recommend, purchase or otherwise supply Ascensia products.

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- We ensure **transparency** by properly documenting all business transactions and interactions with third parties, especially with HCPs. When required by law or industry codes, we report and publicly disclose when a benefit or transfer of value is provided to HCPs or other beneficiaries.

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- We exercise special care in assessing whether an individual involved in a business activity is a **public/government official** and which requirements apply in such situations, considering that very stringent laws and rules expressly apply to public/government officials in most jurisdictions due to their position of trust.

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- We strictly comply with all **applicable** local, national, regional and international **laws, rules and other industry requirements** on anti-corruption, such as (to name only the most known): US Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA), AdvaMed Code of Ethics on Interactions with Health Care Professionals (AdvaMed Code, in the US), as well as the new Medtech Europe Code of Ethical Business Practice (Medtech Code, in Europe).

“ Ascensia’s reputation and sustainability as a trusted partner within the diabetes community can only be maintained if every employee does the right thing

HOW TO ASSESS COMPLIANCE?

To help you assess individual situations, we suggest you consider the following questions before engaging in an activity that involves offering/giving or soliciting/accepting a gift, hospitality, or any other item of value or benefit:

• *Can my actions be seen as attempting to wrongfully influence someone to do something for Ascensia?*

• *Could my behavior be perceived as having been influenced by this benefit, should I accept it?*

• *Am I properly following all applicable laws, rules and codes regarding the practice of providing (or getting) a benefit, in particular when dealing with HCPs or public officials?*



FAIR COMPETITION



WHAT IS FAIR COMPETITION?

Fair competition means an open and equitable competition among competitors in an open-market. Governments and thus competition (or antitrust in the US) laws aim at protecting consumers against predatory business practices and seek to promote fair competition by regulating anti-competitive conduct by companies. Anti-competitive activities can happen between companies in a relevant market, along the supply chain for a specific product, as well as when a company has a dominant position or as a consequence of a merger between companies. Finally, unfair practices may also occur when a company engages in false, deceptive or misleading representations or conduct, especially in the context of promotional activities.

WHY IS THIS IMPORTANT?

Anti-competitive and unfair activities are inherently bad for business as they undermine markets and harm consumers. In order to remain a trusted partner in the diabetes community, Ascensia shall strictly adhere to the laws that are designed to promote and protect competition. Ascensia must compete on the merits of its products and services and encourage the existence of free and open markets. Failure to follow competition/antitrust laws could result in serious fines, lawsuits, lost sales and severe harm to our reputation. Ascensia does not tolerate anti-competitive conduct by its employees, vendors or partners.

OUR CODE ON FAIR COMPETITION

- We do not exchange or discuss **sensitive business information** (such as pricing, sales volumes, production capacities, strategic initiatives, etc.) with competitors, including at the occasion of industry association meetings.

- We never enter into any understanding, agreement, arrangement, or collaborative action with a **competitor** with the intention of (or even giving the appearance of) limiting or restricting competition or having the limitation or restriction of competition as a result. This applies to all agreements and arrangements, whether they are written, verbal or simply understandings between all parties involved.

Examples of arrangements with a competitor that are strictly prohibited include:

- Price fixing
- Markets allocation
- Restricting production
- Bid rigging (submission of collusive tenders), etc.

- We are careful when granting exclusive rights to **customers or suppliers**, or entering into agreements that limit the way in which goods or services can be used, resold or priced. We do not, for example, require customers to stop selling a competitor's product before we will supply them with our product or before we will allow them to resell our products at a fixed or minimum price.

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- We may enjoy a **dominant position** in a given market. However, we never abuse of such a dominant position, be it for a particular product to unlawfully eliminate competition, prevent new competition from entering the market, or manipulate prices. Similarly, we do not deliberately sell products below cost or refuse to sell customers one product unless they agree to buy another product as a result of our influential market share.

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- At times, we may find it beneficial to merge with another company, whether for financial or efficiency reasons. However, we always consider whether the proposed merger will affect the industry's market share and reduce competition. The creation of a monopoly is never the intended outcome and any **merger** must result in a mutually beneficial outcome for both the companies and consumers.

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- We comply with all **applicable competition/antitrust laws**, among others the EU competition law and the antitrust laws in the US, in particular in our interactions with competitors, distributors and other customers or suppliers.

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- We want people with diabetes to be able to choose the best products for themselves. Therefore, we always ensure that any **promotional statements** regarding our products are fair, balanced and based on proper scientific evidence. Comparative claims can only be made if there is sufficient medical support.

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- We adhere to the internal **LMR** (Legal, Medical & Regulatory) review policy for promotional materials and other events in scope, as well as specific **applicable unfair competition laws**.

“ Ascensia must compete on the merits of its products and services

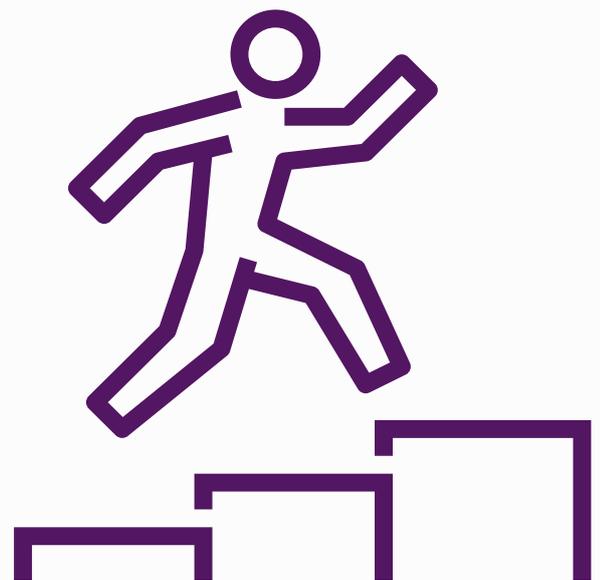
HOW TO ASSESS COMPLIANCE?

To help you assess individual situations, we suggest you consider the following questions before engaging in an activity that may be considered as unfair or anti-competitive:

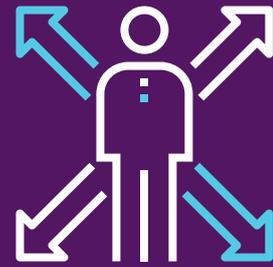
? *Am I sure that the activity I am participating in fully complies with competition/antitrust or unfair competition laws?*

? *Could my actions in any way be seen as undermining markets, unfairly restricting competition, or harming consumers?*

It is noteworthy that some agreements or activities are always considered as anti-competitive (i.e. hardcore restrictions), while others may vary and shall be assessed based on the specific facts and (market) circumstances of the agreement or activity at stake.



CONFLICT OF INTEREST



WHAT IS CONFLICT OF INTEREST?

A conflict of interest is a situation where the aims or concerns of two different parties, such as a company and an employee, are in conflict with one another. Conflicts of interest make it difficult for an employee to separate their own personal interests from those of the company. In certain circumstances, this may lead to unacceptable situations where employees put their own personal interest ahead of what's best for the company due to the potential for personal gain.



WHY IS THIS IMPORTANT?

Ascensia employees are expected to act in the best interests of the company and make decisions impartially. Employees must avoid seeking opportunities for personal gain that could adversely affect their judgment, job performance or decision-making. Perceived conflicts of interest can be as damaging to our reputation as real ones. By following these rules and ensuring transparency, Ascensia is able to maintain our integrity and retain the trust of our customers and partners within the diabetes community.

OUR CODE ON CONFLICT OF INTEREST

- When making decisions regarding an employee or engaging a third party, we use **objective criteria** (such as competencies, job performance and behavior in the work environment, respectively price, quality, reliability and ability to meet technical standards), as well as **transparently** disclose any existing relationship to the line manager or HR business partner. We make decisions based on merit rather than personal relationships.
- We are careful about accepting a parallel **outside opportunity** or positions as they could create a conflict of interest. We contact and discuss the potential position with the line manager or HR business partner for pre-approval before pursuing any of the below activities:
 - **Accepting an employment position from a supplier, competitor, or third party;**
 - **Setting up an own business or providing services on a freelance basis; or**
 - **Serving as a board member at another company or organization.**
- For board memberships in **charitable organizations** (or sports clubs), no mandatory approval is required. We support employees' willingness and desire to privately support their communities (including politically or charitably), through the giving of time, money, or other resources. However, such involvement shall be performed only during non-working hours, with employees' own resources, and shall not interfere with our work performance.

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- During a business interaction, we do not solicit any **personal benefits** such as cash, gifts, hospitality, or meals as these could affect our ability to make an objective decision (see also Anti-Corruption section of this Code of Conduct for additional information on benefits).

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- We are responsible for the proper and careful handling and usage of the **company assets**, and do not use them for private purposes. Similarly, we do not dispose privately of company assets.

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- When using **social media** platforms for business communication, we remain at all times aware that we represent Ascensia and hence consider the following:
 - We get approval from Communications before posting under Ascensia's name
 - We use the platforms responsibly and in the best interest of Ascensia
 - We never post or publish abusive or offensive content, or internal confidential information
 - We make it clear that we are expressing our own personal opinions and not reflecting the views of Ascensia when discussing work-related topics

“ Ascensia employees are expected to act in the best interest of the company and make decisions impartially

HOW TO ASSESS COMPLIANCE?

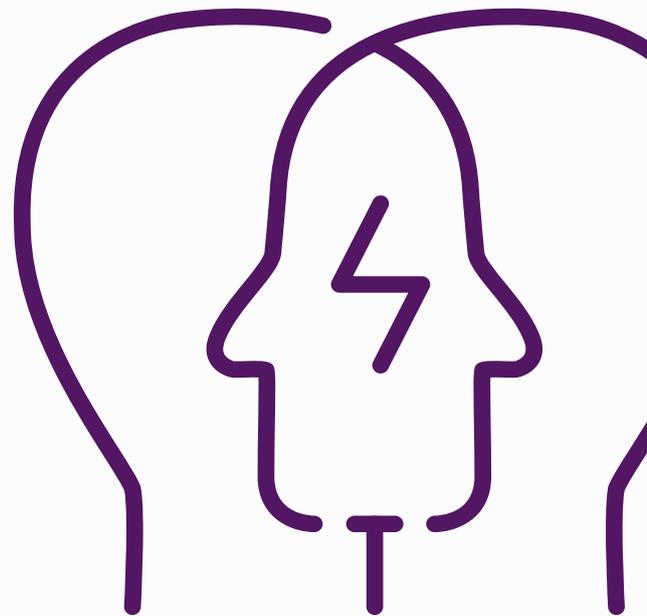
It is the responsibility of all Ascensia employees to ensure that we separate our personal interests from those of Ascensia. When approaching a given situation, consider the following questions to assist you in determining the best course of action:



Am I using my position at Ascensia to personally benefit from a particular decision?



Does this situation require me to choose between my personal interests and the best interests of Ascensia (knowing that the company's interests prevail)?



DATA PROTECTION



WHAT IS DATA PROTECTION?

Ascensia's daily interactions increasingly involve the use of the Internet, intranets and e-mail. These channels allow us to carry out corporate decisions faster and more effectively. However, they can also entail greater risk, which Ascensia must take into account as an ethical enterprise. Many jurisdictions have data protection laws that regulate how personal data is processed, and give individuals certain rights in relation to the data processed about them. Data protection is therefore the process of safeguarding personal data collected, processed and stored against theft, loss and unauthorised use.

WHY IS THIS IMPORTANT?

Ascensia strives to protect the rights of individuals whose personal data it processes – including data of its employees, customers, suppliers, partners, patients, and other parties. Given the nature of our business this data is often confidential, sensitive or health-related information. A strong data protection program is essential to uphold the integrity of the data we process and for Ascensia to remain a trusted organization, particularly in the eyes of our customers and partners within the diabetes community. Furthermore, as data has become increasingly more regulated, it is Ascensia's responsibility to adhere to these regulations and develop the necessary safeguards to protect the data within our care.

OUR CODE ON DATA PROTECTION

- We process personal data lawfully, fairly and in a transparent manner meaning we inform the individual how their data will be used and obtain **consent** from the individual, where required by law.
- We only process personal data for the **purposes** it was collected and changes to such purposes can only be made with the consent of the individual or by other means provided by law.
- We only collect and process personal data when (and for as long as), there is a definable **business need** for the information. Certain sensitive personal data, such as health information, require higher standards of protection to ensure their confidentiality and prevent their misuse.
- We ensure that data is kept **accurate**, and as far as necessary, up-to-date. We carry out appropriate and reasonable measures to correct or delete incorrect or incomplete data.
- We implement appropriate **security measures** to protect personal data. These measures include, amongst other things, controls surrounding the physical and technological access to systems and applications that house personal data.

“ Ascensia strives to protect the rights of individuals whose personal data it processes

- We do not **disclose** personal data, within or outside the company, except where there is a legitimate, business need to do so and provided that the disclosure is permitted by law.
- We use technical measures, including encryption and access controls, to prevent a **data incident** (e.g. unauthorised or unlawful processing or accidental loss of or destruction or damage to personal data, whether actual or suspected). We aim to mitigate any damage resulting from a data incident and handle any incident in compliance with applicable law.
- We strictly adhere to **all applicable data protection and privacy laws** designed to protect and secure personal data, and expect the same from any business partners and/or services providers who have access to personal data.

HOW TO ASSESS COMPLIANCE?

Below are some questions to consider that will help you determine the best course of action relating to the use of personal data:

- *Do I need access to this data and if so, am I handling it as required by law?*
- *Does the data I am handling need to be specially protected? Is the data sensitive, such that I would want to secure it if it belonged to me?*
- *What would the harm be if I lose or mistakenly disclose the information?*



TRADE CONTROLS



WHAT ARE TRADE CONTROLS?

Trade controls are restrictions on the process of transferring goods, technologies or services from one entity to another. A specific type of trade control is an embargo, which is an official ban on trade or other commercial activity with certain countries. These restrictions and regulations are implemented to ensure the safe passage of goods and technologies from one individual to another. For Ascensia, this may include, for instance, certain constraints on the export of our products into some listed countries, and the restricted involvement of our employees in activities related to those countries.

WHY IS THIS IMPORTANT?

Ascensia follows national and international initiatives that aim to prevent the misuse of goods or technologies, including those that prevent the use of products as part of nuclear, biological, or chemical weapons, or in the spread of terrorism or war. Ascensia expects all employees to adhere to trade control regulations and other efforts intended to promote international peace and stability.



OUR CODE ON TRADE CONTROLS

- We strictly follow all **applicable laws**, regulations and national or international initiatives designed to prevent our goods and technologies from being obtained by inappropriate individuals who may use them improperly.
- We expect all our vendors, services providers and other **third party** business partners to strictly adhere to these same laws and regulations.
- We will **not do business**, and will observe restrictions on payments and other financial dealings, with any persons or organizations that have been identified as being associated with the following:
 - Nuclear, chemical or biological weapon activities
 - Terrorism or narcotic trafficking
 - Other improper activities
 - Inclusion on an exclusion or sanctioned list
 - Anti-social forces activities
- We make sure to involve the **trade control experts** that support our organization before conducting business internationally.

HOW TO ASSESS COMPLIANCE?

To help you assess individual situations, we suggest you consider the following questions before engaging in any transfer of goods or technologies:

- *Have I determined what the applicable trade restrictions are for the respective countries involved in the transfer of goods, technologies or services?*
- *Am I subject to specific restrictions as employee in dealing with a business partner in a particular country?*
- *Will the transfer of goods or services violate any trade controls?*

“ Ascensia follows national and international initiatives that aim to prevent the misuse of goods or technologies

CONFIDENTIAL INFORMATION



WHAT IS CONFIDENTIAL INFORMATION?

Confidential information is information not generally known by others outside of the company, such as for instance research and development programs, financial information, or business strategies. Certain forms of **intellectual property** fall also under the umbrella of confidential information. Intellectual property refers to work product or invention that is the result of creativity at a company and can be protected via patents, copyrights, trademarks, etc. These protections enable people to earn recognition or financial benefit from their work product or invention.

WHY IS THIS IMPORTANT?

Confidential information is vital to the successful running of Ascensia's business, and our ability to provide products and solutions to people living with diabetes is based on commercialization of our inventions and preventing others from using our intellectual property without permission. Therefore, intellectual property rights are valuable assets, as they allow Ascensia to protect the hard work of our employees from competitors who may wish to copy or replicate our products.

OUR CODE ON CONFIDENTIAL INFORMATION

- We exercise due **care** when conversing in public places to prevent confidential information from being disclosed, lost, stolen or misused, and generally limit the type and amount of confidential information shared with others outside of the company.
- Before sharing with and/or receiving confidential information from a third party, we enter into a **written agreement** that defines the conditions under which the confidential information can be used. Common types of confidential information include unpublished information regarding research, new product or marketing plans; financial forecasts; details of business development partnerships; and merger or acquisition activities.
- We keep confidential information obtained from other companies **separate** from our confidential information, so as not to combine their information with knowledge that has been independently developed.
- **Former Ascensia employees** must not retain or use Ascensia information for other purposes, including for the benefit of a future employer. Similarly, **new Ascensia employees** shall not use information relating to a former employer (such as a list of customer contacts).

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- We only use Ascensia's **intellectual property** when and as required to perform our job responsibilities. Common types of intellectual property include:

- Patents;
- Trademarks and logos;
- Copyrights;
- Industrial processes, methods and designs; and
- Other forms of proprietary information, e.g. trade secrets and know-how.

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- We respect the intellectual property and confidential information of all partners, **third parties**, and external stakeholders. Therefore, we do not use, copy, or incorporate this information unless we have their permission or any other right to do so.



HOW TO ASSESS COMPLIANCE?

To help you assess individual situations, we suggest you consider the following questions before engaging in conversations or actions related to Ascensia's confidential information and/or intellectual property:

- *Is the information I am sharing about Ascensia available to the general public, and if not it is covered under an agreement?*
- *Is my current location a suitable environment to be discussing confidential information?*
- *If I perform this action, could Ascensia be potentially infringing on the rights of someone else?*

“ Confidential information is vital to the successful running of Ascensia's business

FAIR & RESPECTFUL TREATMENT



WHAT IS FAIR & RESPECTFUL TREATMENT?

Fairness and respect are core standards of behavior for our organization. Our values state that Ascensia employees should respect each other, and appreciate the diversity and open-mindedness of colleagues. The office environment should be a safe place where we show respect to each other and act with fairness. Employees should not have to worry about unfair treatment, discrimination, harassment or other unprofessional or disrespectful behavior.



WHY IS THIS IMPORTANT?

We strive to create the best environment for employees to perform, innovate and develop. Our diverse backgrounds allow us to create a collaborative environment where different ideas are discussed, and innovative solutions flourish. We encourage employees to speak up in good faith if they think something is not right, without fear of retaliation.

OUR CODE ON FAIR & RESPECTFUL TREATMENT

- We show **respect** to everyone, including all colleagues and external third parties, and do not tolerate any type of discrimination. This includes prejudice or different treatment (either consciously or unconsciously) based on race, nationality, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity or expression, or any characteristic that is unlawful under applicable law.
- We forbid **harassment** of any kind or bullying as it creates an intimidating, abusive, or hostile setting. The occurrence of harassment or bullying is determined based on the effect it has on the recipient and can include:
 - Sexual harassment, like physical contact and advances, a demand or request for sexual favor, sexually explicit or motivated remarks, showing pornography, and any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
 - Spreading malicious rumors, humiliating others, or setting them up to fail;
 - Excluding others from social activities at work; or
 - Sharing criticism about an individual with employees who have no need to know.

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- We view **employee safety** as one of our top priorities and exercise care at work, especially when dealing with harmful or potentially dangerous materials or equipment.

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- We are committed to fostering a **drug-free work environment**. As such, employees will face disciplinary action if they are found to be under the influence, or caught selling/dispensing inappropriate substances.

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- We contact our HR business partner to **report** any workplace safety or any other fair and respectful treatment related issue.

HOW TO ASSESS COMPLIANCE?

To help us ensure we have a work environment that is safe and welcoming to all employees, please consider the below questions:



Do the actions or statements of a colleague make you or someone else uncomfortable?



When making employment decisions, are any inappropriate qualities about the individual (gender, age, race, etc.) being considered?



Do you feel, or have you witnessed, any harassment or discrimination?

“ Ascensia strives to create the best environment for employees to perform, innovate and develop



HOW CAN WE BETTER ACT COMPLIANTLY?

ASSESSING COMPLIANT BEHAVIOUR: A PRACTICAL CHECKLIST

In our daily business we may be facing situations where we are unsure how to judge a certain matter under our Code of Conduct or where we have doubts if a certain behavior is compliant or not.

In such situations, together with the questions indicated in every paragraph of our Code of Conduct (under “How to assess compliance?”), the following questions may help to provide an answer:



Does my behavior comply with the Ascensia values?



Am I acting in compliance with and in the spirit of the Ascensia Code of Conduct?



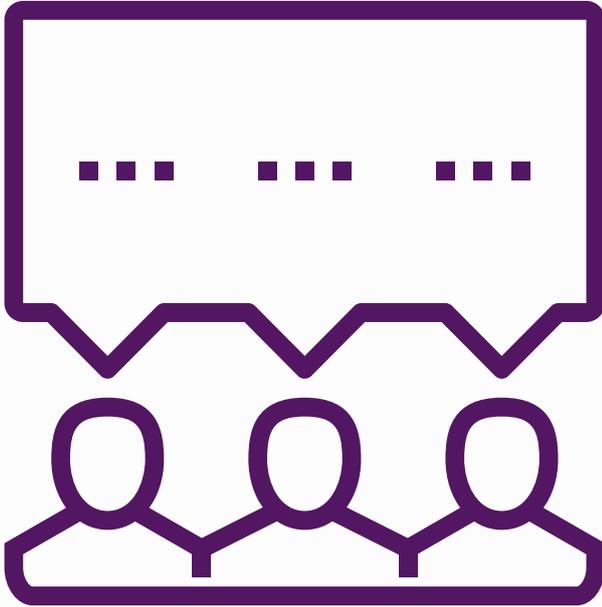
Does my behavior comply with applicable laws and regulations?



Can I be sure that my behavior will not result in negative consequences for Ascensia or for myself?



What if the matter at hand was reported in the newspapers? Would I still feel comfortable about it?



“SPEAK UP”

Ascensia encourages a culture of openness in order to prevent non-compliant behavior. We provide information, resources and advice to prevent violations of laws, rules or company policies. Asking questions and raising concerns helps the company to maintain a strong compliance culture.

Therefore, if you have a question or a concern about a certain behavior:

“ Ascensia encourages a culture of openness in order to prevent non-compliant behavior

- ▶ ***Speak to your manager or your manager’s supervisor;***
- ▶ ***Contact your Legal, Patents & Compliance Department or Human Resources (for HR related matters);***
- ▶ ***Contact the available Compliance Hotline.***

