



# Code of Ethics and Business Conduct

START

# Table of Contents

## Our Why, Vision, Mission and Core Values...3

## Understanding Our Code...4

What Is the Code of Ethics and Business Conduct...4

Our Responsibilities...5

Making Good Decisions...8

Asking Questions and Reporting Concerns...8

Our Non-Retaliation Policy...10

## Ensuring the Best Workplace...11

Diversity, Equity and Inclusion...11

Harassment-Free Workplace...13

Health and Safety...15

## Protecting Company Information and Assets...17

Company Assets...17

Accurate Recordkeeping...19

Speaking on Behalf of the Company...21

## Doing What's Right...22

Conflicts of Interest...22

Gifts and Entertainment...25

Sourcing Responsibly...27

Anti-Corruption and Anti-Bribery...27

Antitrust and Fair Competition...29

Environmental Stewardship...30

## Honoring Our Industry Obligations...31

Ethical Interactions...31

Data Privacy...32

Adverse Events...33

Fraud, Waste and Abuse...33

Marketing and Advertising...34

Product Quality...34

## Where to Go for Help...36

# Our Why, Vision, Mission and Core Values



## Our Why:

We're motivated by a belief that there's always a better way. A smarter way. A more effective way. And we're dedicated to helping doctors find it.

## Our Vision:

To advance patient care by making high-quality molecular technologies more accessible.

## Our Mission:

To simplify the delivery of molecular technologies.

## Our Core Values:

Adaptable Collaborators

Intentional Trailblazers

Engaged Experts





# Understanding Our Code



## WHAT IS THE CODE OF ETHICS AND BUSINESS CONDUCT

It's exciting to be a part of a company that's making a difference. We're partners providing game-changing solutions, and the work we do is critically important.

*How* we do our work is just as critical. One bad decision can slow our progress or, worse, harm the reputation we've earned as a trusted partner. All of us at Molecular Designs and Streamline Scientific (the "Company") are committed to an ethical workplace, compliance with the laws that apply to our operations and workday decisions that reflect who we are as a Company.

Our Code is a vital resource that will help you:

- > Comply with applicable laws, regulations and Company policies.
- > Promote integrity and the highest standards of business conduct.
- > Address common ethical situations you could encounter in your work.
- > Avoid even the appearance of anything improper in connection with the Company's business activities.

It is impossible to anticipate every question you may have or situation you might face, so in addition to the Code, the Company also has other resources that can be of help. These additional resources include: our policies, your manager, the Chief Compliance Officer and the Hotline and are identified throughout the Code.

### Who Must Follow This Code

This Code applies to all Company employees, as well as to the Board of Directors.

This Code also sets the standard we expect from our third-party business partners, including distributors, consultants and temporary employees who may be acting as representatives of the Company. While these third parties may have their own codes of conduct, we expect them to meet our standards as outlined in this Code when working on our behalf. Failure to meet the standards of our Code can expose the Company to liability and put our reputation at risk.

If an ethics or compliance concern does occur, you must [report that concern](#) so that it can be addressed. The failure of an employee to abide by our Code can result in discipline up to and including termination. Similarly, a failure by a third party to follow our Code can impact the Company's relationship with that party.

## OUR RESPONSIBILITIES

Working with integrity leads to success and growth, both individually and collectively as an organization.

### Employee Responsibilities

Each of us is responsible for:

- > Acting in a professional, honest and ethical manner.
- > Knowing our responsibilities under the Code and our policies, particularly those that are the most pertinent to our specific job responsibilities.
- > Completing required employee training in a timely manner and keeping up to date on current standards and expectations.
- > Reporting concerns about possible violations of our Code, our policies or laws or regulations to your manager or another of the resources listed in this Code.
- > Cooperating and telling the truth when responding to an investigation or audit and never altering or destroying records in response to an investigation or when an investigation is anticipated.



### Management Responsibilities

Members of Company management, including all supervisors, have the following additional responsibilities:

- > Leading by example to model the highest standards of ethical business conduct.
- > Contributing to a work environment that focuses on building relationships, recognizing hard work and valuing mutual respect and open communication.
- > Serving as a resource for others by, for example, communicating to employees and business partners about how the Code and other policies apply to their daily work.
- > Being proactive by looking for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- > Never asking or pressuring anyone to do something that you yourself would be prohibited from doing.
- > Using Company resources properly and productively.
- > Understanding and applying the limits of your authority and delegating authority only where permissible – and never to any individual who you believe may engage in unethical or unlawful conduct.
- > Ensuring any third parties for whom you are responsible understand their ethics and compliance obligations under our Code and applicable policies.

**Remember:** No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies or the law.

# What if?



**Q:** I am a manager. Am I required to report misconduct that I observe in an area for which I don't have responsibility?

**A:** Yes. While you are chiefly responsible for employees, contractors and third parties under your supervision, all Company employees are responsible for reporting misconduct for which they become aware. As a manager, you have special responsibilities to take action. The best approach is to speak first with the manager responsible for overseeing the area in which the misconduct occurred; if that isn't possible, you should proceed with reporting using one of the alternative options outlined in the Code.

## Cooperating With Investigations and Audits

From time to time, employees may be asked to participate in internal and external investigations and audits that are conducted by the Company. All employees are expected to fully cooperate with all such requests and ensure that any information they provide is true, accurate and complete.

You may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify your manager and the Chief Compliance Officer before taking or promising any action. If you are directed by the Company to respond to a government official's request, extend the same level of cooperation and, again, ensure that the information you provide is true, accurate and complete.



## Watch Out For

- **Falsified information.** Never destroy, alter or conceal any document in anticipation of or in response to a request for these documents.
- **Unlawful influence.** Never provide or attempt to influence others to provide incomplete, false or misleading statements to a Company or government investigator.

## What if?



**Q:** An inspector from the FDA showed up to audit our facility. What should I do?

**A:** For routine, planned visits, we should all be cooperative and truthful in responding to their requests for information and records, as long as such requests are reasonable and within scope. For non-routine inquiries or visits from government officials, contact both your manager and the Legal Department for further guidance.





## MAKING GOOD DECISIONS

Sometimes identifying the right decision can be complicated. There may be times when you'll be under pressure or unsure of what to do. When faced with a difficult decision about business conduct, ask these questions:

### Facing a Difficult Decision?



Is the conduct a violation of the Code, Company policy or the law?



Will the conduct appear unethical to stakeholders outside the Company?



Could the conduct harm my reputation or the reputation of the Company?

If the answer to any of these questions is **"YES,"** you should pause and reconsider. Remember, in any situation, under any circumstances, it is always appropriate to ask for help from your colleagues or management to identify the best course of action.

## ASKING QUESTIONS AND REPORTING CONCERNS

We want raising concerns to be as easy as possible, so we have a variety of ways for you to tell us when you have a question or concern. You do not need to have all the details or be certain that something is wrong when asking a question or raising a concern.

- > Discuss it with your manager or senior leadership
- > Contact a member of the Human Resources team
- > Contact the Chief Compliance Officer at [compliance@moleculardesigns.com](mailto:compliance@moleculardesigns.com)
- > Report to the Hotline via phone at (833) 605-3585 or web at [moleculardesigns.ethicspoint.com](http://moleculardesigns.ethicspoint.com)





## What to Expect When You Use the Hotline

The Hotline web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns and forward a written report to the Chief Compliance Officer for further investigation.

After you make a report through the Hotline, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, the Company will not be able to inform you about individual disciplinary actions.

When you contact the Hotline, you may choose to remain anonymous where permitted by local law.

We will make every reasonable attempt to ensure that your concerns are addressed appropriately through steps such as investigation, remediation and, where necessary, corrective actions to address issues, learn from mistakes and avoid recurrences. All reports, whether reported anonymously or with an identity, will be treated equally. To the extent possible, any report will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, by asking questions and reporting concerns, you are doing the right thing and helping the Company stop or prevent misconduct.

# What if?



**Q:** I believe a coworker has misused the Hotline to falsely accuse someone of wrongdoing. What should I do?

**A:** Report your concern immediately. Experience has shown that the Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on reports, and anyone who uses the Hotline in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.

## OUR NON-RETALIATION POLICY

The Company will not retaliate or permit retaliation against any employee who, in good faith, asks questions, raises concerns regarding misconduct or violations of the Code, Company policies or the law or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.

# What if?



**Q:** I suspect there may be some unethical behavior going on in my department involving my manager. I know I should report my suspicions, and I’m thinking about using the Hotline, but I’m concerned about retaliation.

**A:** You are required to report misconduct and, in your situation, using the Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.

**Q:** I suspect, but am not certain, that an employee is violating our Code. Should I keep my concerns to myself given my uncertainty?

**A:** If you suspect a violation, say something. It’s better to raise a potential issue than to wait and risk harm to others or the Company. You can report the suspected violation to your manager, a member of the management team, a member of the Human Resources team, the Chief Compliance Officer or the Hotline. Reporting “in good faith” means you are coming forward honestly with information you believe to be true, even if an investigation reveals you were mistaken.

# Ensuring the Best Workplace



## DIVERSITY, EQUITY AND INCLUSION

We share responsibility for fostering an inclusive and respectful workplace and for treating each other fairly and with honesty and respect. To maintain this shared commitment and to attract and retain talented individuals, we must maintain a supportive, professional and respectful work environment.

The Company brings together employees with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

We base employment decisions on qualifications, demonstrated skills and achievements – and never on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, genetic information or any other characteristic protected by law.

Our colleagues, job applicants and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute and develop with us.

### Do the Right Thing

- Treat others respectfully and professionally.
- Promote diversity in hiring and other employment decisions.
- Do not discriminate against others on the basis of any characteristic protected by law or Company policy.

### Watch Out For

- Comments, jokes or materials, including emails, which others might consider offensive.
- Inappropriate bias when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.



# What if?



**Q:** One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

**A:** If you are comfortable doing so, you should ask the coworker to stop. If you prefer, share your concerns with your manager or one of the other available resources outlined in the Code. Sending these kinds of jokes does not reflect our values. This behavior also violates Company policies that relate to the use of email and our standards on diversity, harassment and discrimination.





## HARASSMENT-FREE WORKPLACE

We all have the right to work in an environment that is free from intimidation, harassment, bullying and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment will not be tolerated.

### Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions, such as a request for a date, a sexual favor or other similar conduct of a sexual nature.
- An intimidating, offensive or hostile environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.

### Do the Right Thing

- Promote a positive attitude toward policies designed to build a safe, ethical and professional workplace.
- Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

### Watch Out For

- Threatening remarks, obscene phone calls, stalking or any other form of harassment.
- Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- Verbal abuse, threats or taunting.



# What if?



**Q:** While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Was that harassment?

**A:** Yes, it was. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, report the problem.



## HEALTH AND SAFETY

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for you, for the Company and for every employee on the job.

## Alcohol and Drugs

While at work or on Company business:

- You should be always ready to carry out your work duties – never impaired.
- Do not use, possess or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm the Company's reputation.

## Workplace Violence

Violence of any kind has no place at the Company. We won't tolerate:

- Intimidating, threatening or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage or other criminal activities.
- The carrying of firearms or other weapons onto our property unless you are authorized to do so.



## Do the Right Thing

- Follow the safety, security and health rules and practices that apply to your job.
- Maintain a neat, safe working environment by keeping workspaces free from obstacles, wires and other potential hazards.
- Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Cooperate with any investigations into incidents.

## Watch Out For

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.

## What if?



**Q:** A subcontractor commits a violation of our standards. Are subcontractors expected to follow the same health, safety and security policies and procedures as employees?

**A:** Absolutely. Managers are responsible for ensuring that subcontractors and other business partners at work on Company premises understand and comply with all applicable laws and regulations governing a facility, as well as with additional Company policies and procedures.





# Protecting Company Information and Assets



## COMPANY ASSETS

Each of us is entrusted with Company assets and are personally responsible for using them with care and protecting them. Company assets include confidential information (business and marketing plans, financial information and/or reports, strategic initiatives, customer lists, etc.), funds, facilities, equipment, information systems (software and technology) and intellectual property (patents and patent applications, trade secrets, trademarks and trade names, etc.). This information could be in electronic or paper format.

Protecting these assets means keeping this information secure, limiting access to those who have a need to know in order to do their job and only using it for authorized purposes. Be aware that your obligation to restrict your use of Company confidential information and intellectual property continues even after your employment ends.

Our customers and business partners place their trust in us. We must also protect their confidential information just as we protect our own.

## Intellectual Property

Examples of intellectual property (IP) include:

- Business and marketing plans
- Company initiatives (existing, planned, proposed or developing)
- Customer lists
- Trade secrets and discoveries
- Methods, know-how and techniques
- Innovations and designs
- Systems, software and technology
- Patents, trademarks and copyrights

The Company commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact the Legal Department if you receive questions regarding:

- The scope of intellectual property rights
- The applicability of our rights to another company's products
- The applicability of a third party's intellectual property rights to Company intellectual property rights or products

## Do the Right Thing

- Use our assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities.
- Be a good steward of our electronic resources and systems, and practice good cybersecurity.
- Promptly disclose to management any inventions or other IP that you create while you are employed by us.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our and third-party intellectual property and confidential information by sharing it only with authorized parties that have a need to know in order to do their job, and avoid removing such information from secure locations or devices.
- Only store or communicate Company information using Company information systems.
- Understand the expectations of customers and business partners regarding the protection, use and disclosure of the confidential information they provide to us.
- Immediately report any loss or theft of confidential information to your manager.
- Always follow Company policies when transporting, transmitting, storing or sending confidential information or patient information.

## Watch Out For

- Requests to borrow or use Company equipment without approval.
- Excessive use of our resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.
- Discussions of Company confidential information in places where others might be able to overhear – for example on planes and elevators and when using phones.
- Sending confidential information to unattended devices or printers.
- Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.
- Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.



## ACCURATE RECORDKEEPING

Our financial books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies. Employees with a role in financial or operational recording and reporting have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. It takes all of us working together to ensure the information we record is accurate, complete and maintained in a manner that is consistent with our system of internal controls.

Good science also requires good recordkeeping to promote both accountability and integrity in research. Good records are complete, accurate and understandable to others. Records of research activities should be kept in sufficient detail to allow a similarly skilled scientist to repeat the work and obtain the same results.

In addition to applicable regulatory requirements, our customers rely on the accuracy of our manufacturing and quality control records for their endeavors, including in the provision of health-care. We must all ensure that documentation supporting our products and services is clear, correct and complete.



## Records Management

Documents should only be disposed of in compliance with Company policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Legal Department.

## Do the Right Thing

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. Write as though someday the records you create may become public documents.

## Watch Out For

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets or liabilities.
- Improper destruction of documents.

# What if?



**Q:** At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and their work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

**A:** No, you didn't. Costs must be recorded in the period in which they are actually incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud. The better action would have been to refuse and to report the request to someone in the Finance Department or to the Chief Compliance Officer. Raising it after the fact is still valuable so that our records can be corrected, and others can be educated on the issue.





## SPEAKING ON BEHALF OF THE COMPANY

The Company is committed to maintaining honest, professional and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, each of us must help ensure that only authorized persons speak on behalf of the Company. Refer any communications with the media, investors, stock analysts and other members of the financial community to executive management.



### Watch Out For

- Giving public speeches or writing articles for professional journals or other public communications that relate to the Company without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for us without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about the Company or its customers or business partners.

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of the Company.

If you believe a false statement about the Company has been posted, do not post or share nonpublic information, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors or may be inaccurate or misleading. Instead, contact a member of the management team.



# Doing What's Right



## CONFLICTS OF INTEREST

A conflict of interest arises when a competing interest may interfere with your ability to make an objective decision on behalf of the Company. Each of us is expected to use good judgment and avoid situations that can lead to a conflict of interest, or even the appearance of a conflict. Conflicts of interest undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential or even just a matter of appearance. Since these situations are not always clear-cut, any potential conflict of interest needs to be fully disclosed to your manager so that it can be properly evaluated, monitored and managed, when necessary.



Be alert to situations, including the following, which are common examples of potential conflicts of interest:

### **Corporate opportunities**

Any business opportunity you learn of through your employment belongs to the Company first; you should not take that opportunity for yourself unless you get written approval from your manager, who will analyze the situation in conjunction with the Chief Compliance Officer.

### **Friends and relatives**

If you find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor, supplier, etc., you should take steps to ensure others are confident your judgment is not compromised. You can do this through discussion with your manager to determine if any precautions need to be taken.

### **Outside employment**

If you are engaged in any employment apart from the Company, please ensure that your manager is aware of it and agrees it does not interfere with or detract from your work at the Company. Working for a competitor, business partner or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with the Company.

### **Personal investments**

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner or customer. Make sure you know what's permitted – and what's not – by our policies and seek help with any questions.

### **Civic activities**

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners or customers, especially if your current job gives you the ability to influence our relationship with them.



## Do the Right Thing

- Make business decisions in the best interest of the Company, avoiding actions and decisions that create, or even appear to create, a conflict of interest.
- Proactively address situations that may put your interests or those of a family member in potential conflict with the Company.
- Never use your position at, or resources available through, the Company for improper personal gain.
- Consult with the Chief Compliance Officer when a potential conflict exists.

## What if?



**Q:** I have a friend who has started a small business and is selling a tool for researchers that would be attractive to many of my customers who are conducting research. Since I am already calling on these researchers and the tool would benefit them, can I mention this to them during sales calls?

**A:** No. If the Company wanted its sales force selling items during calls, it would add the product to our portfolio. Promoting or selling additional items that are not in the Company portfolio during sales calls would be a conflict of interest and would also raise potential liability issues.

**Q:** I have been asked by a nonprofit arm of a customer with whom we do business whether the Company will donate a copy machine for their office. The organization does good work in the community for local families in need. Can the Company make this donation?

**A:** Before the Company will make a donation, it must be clear that the donation will not in any way influence the recipient to provide the Company with an improper advantage. Then, the question is whether such donations are in line with the Company's general practices on charitable contributions. For this reason, prior approval must be obtained from senior management or the Chief Compliance Officer.



## GIFTS AND ENTERTAINMENT

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business or strengthen working relationships. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Only offer and accept gifts and entertainment that comply with our policies.

Be aware that the rules for what we may give to – or accept from – government officials are much more strict. Don't offer anything of value to a government official without obtaining approval, in advance, from the Chief Compliance Officer. And remember: We do not accept or provide gifts, favors or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision.

### Do the Right Thing

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to – or accept them from – a business partner with whom you are involved in contract negotiations.
- Make sure that anything given or received complies with the Company policies of both the giver and the recipient.
- Never give or accept cash or cash equivalents.
- Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.

### Watch Out For

- Situations that could embarrass you or the Company.
- Gifts, favors or entertainment that may be reasonable for a privately owned company but not for a government official or agency.



# What if?



**Q:** When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

**A:** You need to let your manager know or report it to the Chief Compliance Officer as soon as possible. We may need to return the gift with a letter explaining our policy. If the gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.



## SOURCING RESPONSIBLY

The Company evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements.

All agreements are negotiated in good faith and must be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law and in a way that's consistent with our Code, our policies and our values.

## ANTI-CORRUPTION AND ANTI-BRIBERY

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. The Company is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents the Company.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all business partners, particularly in any situations where "red flags" would indicate further screening is needed before retaining the business partner. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.



## Key Definitions

**Bribery** means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial or commercial advantage.

**Corruption** is the abuse of an entrusted power for private gain.

**Facilitation payments** are typically small payments made to low-level government officials that are intended to encourage them to perform their responsibilities.

**Government officials** include government employees, political parties, candidates for office, employees of public organizations and government-owned entities.

## Do the Right Thing

- Understand the standards set forth under anti-bribery laws which apply to your role.
- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Accurately and completely record all payments to third parties.

## Watch Out For

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with us clearly documented in writing.





## ANTITRUST AND FAIR COMPETITION

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices. Antitrust laws are complex, and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.

In general, the following activities are red flags, should be avoided and, if detected, reported to the Legal Department:

- Sharing the Company's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.
- Entering into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers or markets.
- Engaging in conversations with competitors about competitively sensitive information.

# What if?



**Q:** One of my direct reports, who recently joined the Company from a competitor, has brought with her the competitor's customer list and price list. She said she has plans to use it to our advantage. Should I just ignore this and let her do it?

**A:** No. The use of that information could result in legal action against the Company, the new employee and potentially even you by the competitor. Tell her not to use the information. If she insists, or you believe she will use the information despite your instruction not to, you must report this to the Legal Department or through another channel for appropriate action.



## ENVIRONMENTAL STEWARDSHIP

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers and the public.



### Do the Right Thing

- Protect safety and the environment. Read and understand all the information provided by the Company that is relevant to your job and operate in full compliance with environmental, health and safety laws and regulations.
- Fully cooperate with environmental, health and safety training and with the Company's periodic compliance reviews of our products and operations.
- Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- Provide complete and accurate information in response to environmental, health and safety laws, regulations and permits.
- Be proactive and look for ways that we can minimize waste, energy and use of natural resources.

Contact the Chief Compliance Officer if you have any questions about compliance with environmental, health and safety laws and policies.



# Honoring Our Industry Obligations



## ETHICAL INTERACTIONS

In our interactions with healthcare professionals, we observe good business practices, meeting industry standards and complying with Company policies. We also comply with federal and state laws that govern our relationships with healthcare professionals, including the U.S. Anti-kickback Statute and the Stark Law. Make sure that any interactions are professional and serve a legitimate business purpose, and never engage in any conduct that is intended to – or could even suggest the appearance of – improperly influencing a healthcare professional's decision.



### Do the Right Thing

- Never pay or offer to pay anyone, including colleagues, physicians or any other provider for patient referrals.
- Do not offer or give anything of value to influence or reward using, purchasing, leasing or recommending our products or services.

### Watch Out For

- Gift-giving – federal and state laws and our policies strictly limit what we may give healthcare providers in the way of gifts, entertainment, promotional items and other hospitality and business courtesies.
- Improper influence – don't interfere with a healthcare professional's independent judgment.

## DATA PRIVACY

We respect the personal information of others. Follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing and disposing of sensitive information. Only use it – and share it with others outside of the Company – for legitimate business purposes.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly.



## Privacy and HIPAA

The Company complies with laws such as the Health Insurance Portability and Accountability Act (HIPAA) which protect the privacy of personally identifiable information (PII) and protected health information (PHI). We collect only the minimum PHI or PII needed to perform our work and use it only for legitimate business purposes.

- PII is information that can be used to trace someone's identity or can be combined with other personal information to do so (for example, a name, address, social security number, driver's license number or account number).
- PHI is a specific type of personal information that identifies an individual and relates to a person's physical or mental health, treatment or payment for healthcare.

## Watch Out For

- Failing to shred or securely dispose of sensitive information.
- Using "free" or individually purchased internet hosting, collaboration or cloud services that could put personal information at risk.



## ADVERSE EVENTS

We have an obligation to report any issue that could compromise the quality or safety of the products or services we provide to customers.

If you see, suspect or become aware of a situation that is unsafe, doesn't comply with our quality policies or procedures, or could adversely affect any of our products, you have a responsibility to immediately bring it to the attention of your manager. By acting quickly, you help us to address and correct the issue before it presents a risk to those we serve.

## FRAUD, WASTE AND ABUSE

The Company is committed to the integrity of the healthcare system and to detecting, correcting and preventing false claims. As part of this commitment, we expect our employees to be able to recognize and report instances of fraud, waste and abuse.

Each of us has a responsibility to ensure payments and transactions are properly authorized and fully and accurately recorded in compliance with all applicable laws and Company policies.

### Do the Right Thing

- Complete all required training and know the definitions of "fraud," "waste" and "abuse."
- Ensure timely and accurate documentation, coding and billing that reflect services ordered and actually performed.
- Only bill for services we actually provide.
- Promptly report any instances of suspected fraud, waste or abuse.

### Watch Out For

- Activities that constitute fraud, waste or abuse, such as:
  - Billing for services that have not actually been provided.
  - Intentionally misrepresenting or manipulating information to receive payment for services that were not provided.
- Lack of supporting documentation, where it is required.



## MARKETING AND ADVERTISING

Our advertising and promotion efforts focus on conveying useful information to healthcare providers, researchers, patients and customers. We only promote our products for uses that have been approved or authorized by appropriate government or regulatory agencies.



## PRODUCT QUALITY

We are committed to providing safe, high-quality products and services. Our customers rely on this commitment and trust us to meet the highest standards of safety and quality performance.

### How We Inspire Trust

We deliver on our commitments and ensure that we meet the highest standards by:

- Innovating our processes and operations.
- Following applicable Quality policies.
- Testing our products to ensure that only those of the highest quality reach the market.
- Evaluating the performance of our products throughout their life to ensure quality and reliability.

### Do the Right Thing

- Help us continue producing quality products by always making safety a priority, adhering to the highest standards and never sacrificing quality to meet a Company target or deadline.
- If you see or suspect activity that goes against our commitment, speak up.



# What if?



**Q:** I think there may be an issue with one of our manufacturing processes, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do?

**A:** We never sacrifice quality to meet a deadline or target. You should report the matter immediately.

**Q:** We received a complaint from one of our customers about the performance of one of our assays. After talking with the customer, I decided that the problem was with the customer, not the assay. I've decided not to record this as a complaint, but one of my colleagues has reported me to our supervisor. Is this really such a big deal?

**A:** You should have recorded it, even if you believed it was not a product quality problem. It is very important that all of our quality system records are complete and accurate, including any product complaints, regardless of fault.



# Where to Go for Help



To ask a question or raise a concern, choose the reporting option with which you are most comfortable. Whichever option you choose, your confidentiality will be respected.

Email: [compliance@moleculardesigns.com](mailto:compliance@moleculardesigns.com)

Web: [moleculardesigns.ethicspoint.com](http://moleculardesigns.ethicspoint.com)

Phone: (833) 605-3585

