Code of Conduct

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1. Introduction

The Code of Conduct defines the way we do business – at all times and in all places

The Hamilton companies, Hamilton Bonaduz AG and Hamilton Medical AG, as well as all their subsidiaries, hereinafter referred to as Hamilton, are committed to fulfilling their social responsibility as an integral part of their corporate activities around the globe. Hamilton is committed to conducting its business in an environmentally and ethically responsible manner and in line with the applicable laws and regulations.

Hamilton's reputation depends on our integrity in our business dealings. We endeavor to ensure that all interactions are conducted in an impeccable manner and according to the rules.

This Code of Conduct reflects our shared values as defined and stated in Hamilton's vision statement and principles and expresses what we as an employer expect of our employees. The Code of Conduct applies to all Hamilton companies, all business units and all employees, regardless of where and in which field of activity they work. Our employees play a role in contributing to Hamilton's integrity through the way they conduct themselves.

Our Code of Conduct defines standards and principles for professional behavior within Hamilton companies. Along with the "Employee Handbook", the "Management Handbook" and other work-specific directives and work procedures it outlines how Hamilton employees should conduct themselves. However, this Code does not absolve us of our personal responsibility to act and judge independently and in a thoughtful manner. We carefully consider whether our conduct meets Hamilton's standards of integrity and expectations in our business dealings on a case-by-case basis. If you do not find an explicit answer to a question, your interpretation of the Code of Conduct must always comply with our vision statement and corporate values. If you have any doubts about the appropriate behavior, consult the applicable documents or contact your supervisor.

Hamilton does not tolerate violations of the Code of Conduct and will handle any and all non-compliant behavior accordingly. We must always remember that violations of the Code of Conduct may have serious consequences for Hamilton as well as for ourselves. We are required to demonstrate integrity and help maintain Hamilton's reputation. When in doubt, it is important to seek advice and support. Concerns about integrity or violations of Hamilton's Code of Conduct or suspicions of such can be reported at any time, anonymously if desired, via the company's Whistleblowing Hotline at https://hamilton.integrityline.io.

Our Vision

«We drive innovation to improve people's lives.»

The Hamilton history began in the late 1940s when Clark Hamilton developed a lead-shielded syringe in collaboration with the Lawrence Livermore Radiation Laboratory located near Berkeley, California. This syringe made it possible to precisely handle radioactive isotopes. After relocating to Whittier, California, Clark Hamilton focused on developing a solution for handling microliter liquids in the field of chromatography. This is where the microliter syringe was invented. The development of precision syringes and their reproducibility had a crucial impact on separation science in chemistry. In 1968, Clark Hamilton founded an identical company in Bonaduz to manufacture microliter syringes for the European scientific community. Hamilton has continued to develop and produce innovative products ever since. It constantly drives innovation and expands its product range in competence centers. The ongoing innovations have kept the company steadily growing in a number of business areas. This includes the field of automated fluid handling, in which Hamilton is the largest company in the industry in the global arena. While evolving to this position, Hamilton has also entered other new technology areas, such as sensors and measurement. In 1983, Hamilton Medical AG was founded, an independent stock corporation that develops and produces high-end respiratory equipment. Hamilton Storages Technologies Inc. was also founded, which has a Swiss branch in the form of Hamilton Storage GmbH. This company operates in the field of biological and compound sample management and offers solutions for storage in the range of –80°C to –20°C. Hamilton companies produce innovative products that unlock new opportunities for science. Our recipe for success is to provide our customers with cutting-edge technology that simplifies complex processes. We offer comprehensive customer support, prioritize innovation, pay close attention to quality and precision, and provide reliable solutions – both today and in the future.

Our values

Entrepreneurial: «We think and act in an entrepreneurial manner with a clear focus on our goals.»
Sustainable: «We act in a manner consistent with economic success, social justice, and environmental responsibility.»
Respectful: «We respect each other and foster considerate interactions.»
Communicative: «We communicate actively.»
Innovative: «We live and breathe innovation and are continuously redefining the status quo.»
Reliable: «We live and breathe innovation and are continuously redefining the status quo.»

2. Employment at Hamilton

In keeping with our corporate culture, we are committed to providing a safe and open work environment

Our values include being “respectful, communicative, reliable, innovative, sustainable, and entrepreneurial”, which reflect our attitude and serve as a guideline for our actions and decisions in our day-to-day operations. These values lay the cornerstone of Hamilton’s corporate culture. We ensure all employees are treated fairly. At Hamilton, we foster and expect mutual respect and trust. We offer our employees a safe and open working environment, where personal responsibility and teamwork count. Our meaningful and appreciative corporate culture is one of the reasons why our employees work together and pour their heart and soul into improving people’s lives through our products each and every day.

If we become aware of violations of the provisions of employment at Hamilton, or if we suspect such violations, we report this via the company's Whistleblowing Hotline at https://hamilton.integrityline.io.

2.1 Working at Hamilton

We work based on trust, respect and personal responsibility

We work based on mutual trust and respect, accept personal responsibility, and work towards ensuring comprehensive professional and social competence. Our positive working atmosphere is also based on a respectful attitude, flat hierarchies, goal-oriented management, performance-related compensation, and opportunities for professional and personal development. Hamilton’s employees are distinguished by motivation, customer-oriented thinking, and their entrepreneurial approach.

The “Employee Handbook” sets out our employment rights and obligations in more detail and fosters cooperation between employees and Hamilton. We carry out our daily work in accordance with these instructions and take responsibility for our actions. We treat all our stakeholders respectfully, fairly, and without discrimination.

Hamilton’s approach to employment rights and obligations is based on the following International Labor Organization (ILO) convention, and at the same time it expects all business partners to comply with the ILO core labor standards:

- Child labor: Hamilton is committed to prohibition of child labor. This means that no person under the age of 15 will be employed, assuming local law has not set a higher age limit and assuming that no exceptions are allowed.
- Forced labor: Hamilton is committed to the prohibition of forced or compulsory labor in all its forms. Forced or compulsory labor is defined as any type of work or service that is required of a person under threat of some penalty and for which they have not volunteered.
- Employee rights: Hamilton respects the right of employees to freedom of association, freedom of assembly, and collective bargaining, to the extent that these are legally permissible and possible in the respective country.

In connection with employment at Hamilton, the following guidelines apply at our company:

- We conduct ourselves based on Hamilton’s values.
- We observe the guidelines set out in the «Employee Handbook».

- Child labor and any form of forced labor are prohibited at our company and will not be tolerated.
- We guarantee the employee rights of all our employees. We strongly value a culture of freedom of expression.

2.2 Diversity and Equal Opportunity

We are a transnational, multicultural and diverse team – «We are Hamilton»

Hamilton employs people from more than 60 different countries and a wide variety of cultural backgrounds, languages, orientations, and beliefs. We benefit from our diverse workforce, which adds tremendous value. Contrasting ways of seeing, acting, and approaching challenges, as well as backgrounds, opinions, and skills that differ, make it possible for the employees to provide each other with inspiration and to accelerate learning processes. This leads to more creativity, greater innovation, and improved performance. We ensure fair treatment of all employees, regardless of skin color, ethnicity or origin, age, gender, sexual orientation, religion, language, impairments, or other relevant characteristics. We are committed to diversity, equal opportunity, and inclusion.

The ideal of diversity ensures that we reflect all our employees with their wide-ranging backgrounds as well as the various regions and countries in which we operate. When it comes to equal opportunities, we champion ensuring that every individual has the same opportunities and is treated fairly. Through inclusion, we seek to bring people together and to actively empower every voice. In this way, we foster internal cohesion and inspire all employees to identify with Hamilton. All relevant work processes of recruitment, employment, development, and continuing education, as well as in the management culture, are designed in such a way as to support diversity and enable genuine equal opportunities and inclusion.

We are a diverse team at Hamilton. We are bound together by mutual respect and our common goal: “We drive innovation to improve people’s lives.” We are convinced that our diversity helps us grow as people, as a team, and as a company. The individual success for us as employees and therefore the success of Hamilton as a whole, depends on our abilities and the performance we deliver.

We are committed to treating all existing and potential employees fairly and equally and to applying the principles of equal rights and equal treatment to all, both in our daily work as well as in training and development.

In connection with diversity and equal opportunities, the following instructions apply at our company:

- We consider diversity, equal opportunity, and inclusion as a basic requirement, priority and key opportunity for our success.
- We design all relevant work processes to counteract stereotyping – deliberate and/or otherwise.
- We treat all of our employees equally regardless of color, ethnicity or origin, age, gender, sexual orientation, religion, language, impairments, or other relevant characteristics. We also demand the same behavior from our employees.
- We will contact our respective supervisors or Human Resources (HR) to address any actual or potential violations of diversity and equal opportunity policies when we discover them.

2.3 Discrimination and Harassment

We strive to foster a work environment that is free from discrimination and harassment and do not tolerate any form of conduct that violates someone's integrity

Hamilton is an international company with a wide variety of employees working together around the world. We are proud of this diversity and want to proactively encourage and leverage it by involving all employees in an inclusive work environment and diligent leadership. Our employees have a right to be treated fairly and with respect by supervisors as well as by all employees.

We do not tolerate bullying, sexual harassment, discriminatory behavior or violence in the workplace. We have no tolerance for situations in which employees are subjected to offensive, objectionable, or other undesirable conduct in the course of their daily work that violates their personal dignity or creates an intimidating, hostile, or humiliating atmosphere for the victim. We are committed to ensuring that our employees work in an environment that is free from discrimination and retaliation against others based on color, ethnicity or origin, age, gender, sexual orientation, religion, language, impairment, or other relevant characteristics. Employees may not be verbally or physically harassed on the basis of these or any other factors. Hamilton's highest priority is the mental and physical integrity of all employees. This principle applies equally to each and every employee and is communicated to all employees and, in particular, to managers. Hamilton follows the International Labor Organization (ILO) Convention on Discrimination in Employment and Occupation, guaranteeing non-discriminatory treatment for all employees.

Hamilton's discrimination and harassment policies apply to all aspects of the employment relationship, including employment, job assignment, promotion, compensation, work discipline, and termination.

In connection with discrimination and harassment, the following guidelines apply at our company:

- We conduct ourselves and treat others with integrity, respect and dignity, courtesy, honesty, and consideration.
- At our company, we do not accept discrimination, bullying, sexual harassment or violence of any kind.
- We report inappropriate behavior to our respective supervisors.

2.4 Fair Treatment

Culture shapes us and we shape culture

Hamilton's corporate culture shapes who we are as employees. We, in turn, shape our corporate culture. This interpersonal feedback cycle is something we live each and every day at Hamilton. Together, we work to cultivate a culture where everyone feels welcome. We are convinced that our employees can perform to the best of their abilities in a working environment where they feel they are taken seriously and feel safe.

We value working relationships based on partnership and flat hierarchies and have a company-wide "informal" culture. We believe that mutual respect depends more on attitude than grammatical formalities. We communicate actively and respectfully. These are the two most important values for communicating with each other. If you have any questions, please contact our colleagues directly. We

value the open exchange and cooperation across departmental boundaries. A great willingness to help among employees is one of our distinctive features.

When dealing with each other, the following guidelines apply at our company:

- We always treat each other with mutual respect and as equals.
- We engage in proactive communication on topics that are relevant to our employees.
- Our communication is always positive, simple, and easy for everyone to understand. The senders are always visible.
- We communicate internally before externally (informing employees first, then the public).

2.5 Health, Safety and Environmental Protection

We are committed to ensuring the safety and health of all employees in the workplace as well as to a clean environment and sustainable products

We have a strong commitment to ensuring the health and safety of our employees, customers, and suppliers and protecting the environment. Hamilton companies manufacture and distribute safe products and ensure a safe and healthy workplace for all employees across the globe.

We comply with applicable health, safety and environmental laws, and recognized company standards and take every reasonable step to ensure safe, healthy, and clean working conditions for all employees.

Occupational health management operates systematically at Hamilton and is supported by all necessary technical, organizational and HR measures. Our occupational health management systematically affects all health-relevant factors in the company, while reducing harmful aspects and strengthening factors that promote health.

Wherever possible, we aim to ensure continuous improvement in the areas of health, safety, and environmental protection. We proactively strive to develop and use new and sustainable technologies in order to minimize the negative impact on society as well as the environment. We are committed to continuously minimizing material consumption, producing less waste, and reducing environmental pollution in order to contribute to the sustainable development of society. We are personally responsible for health, safety, and environmental protection in our workplace.

In connection with health, safety, and environmental protection, the following guidelines apply at our company:

- We assume personal responsibility for ensuring health and safety in the workplace and for protecting the environment.
- We do not carry out any work where our own safety and health or that of others is not ensured.
- We take into consideration what we can do to promote health, safety, and environmental protection in our day-to-day operations.
- We are involved in the environmental aspects. They can be influenced by us – both internally and externally.

3. Corporate Integrity

Hamilton's integrity is shaped by the behavior of our employees

The various Hamilton stakeholders and interest groups expect us to conduct our business with integrity. This is why we are committed to ensuring integrity in our business practices by ensuring that we behave in a manner that is in compliance with Hamilton's Code of Conduct and that our business is operated in a socially responsible manner. We base our conduct on universally accepted ethical values and principles, in particular, compliance with all applicable laws and regulations as well as Hamilton's defined standards of integrity.

Hamilton's lasting success requires that we adhere to our standards. While this may result in us losing certain business, we believe that acting with integrity provides a competitive advantage.

In order to ensure that our employees conduct themselves correctly in business dealings, they review the standards to be complied with in each specific case by taking all relevant circumstances into consideration. Hamilton will provide all employees and business partners with the information, guidance, and assistance needed to comply with the Hamilton Standards of Business Integrity.

If we become aware of violations of the provisions of corporate integrity, or if we suspect such violations, we report this via the company's Whistleblowing Hotline at https://hamilton.integrityline.io.

3.1 Anti-corruption

We do not tolerate corruption or bribery in the conduct of our business operations

Hamilton condemns any form of corrupt behavior, such as bribery, fraud and theft, etc., whether public or private, active or passive. We do not tolerate corrupt behavior in any form, even if it means we have to turn away business. In order to secure new orders or to extend existing ones, our employees and business partners must not offer or promise unfair advantages to others at any time and in any form, or solicit such advantages from others. We will not suffer any kind of loss if Hamilton turns away business in order to comply with the Code of Conduct.

In connection with anti-corruption, the following guidelines apply at our company:

- We will not practice, tolerate, or in any way, support corrupt behavior at any time.
- We must not offer or promise unfair advantages at any time. We are also prohibited from soliciting or accepting such advantages.
- We must make sure that our business conduct does not offer room for misinterpretation and is consistent with the Hamilton Standards of Business Integrity.
- Hamilton does not support any political parties or campaigns.
- The management must approve donations and sponsoring contributions.
- We are required to report any suspicion of corrupt behavior and other violations of these provisions.

3.2 Competition and Antitrust Law

We prioritize fair competition and compliance with applicable law

Hamilton supports free competition and independent entrepreneurship. We follow business practices that are legitimate and widely accepted and compete on a fair and ethical basis. We prioritize compliance with applicable competition laws. In competitive markets, we focus on conducting ourselves in a professional manner and providing quality work, and we ensure that no one is unfairly prevented from competing with us.

The applicable competition and antitrust laws both promote and protect free competition. It prevents companies from coordinating their respective competitive behavior with each other or from leveraging their dominant position in the market. We are familiar with the legal provisions concerning tendering procedures and are committed to observing them.

Competition and antitrust laws of a country generally have extraterritorial reach: They also apply if conduct that has a negative impact on competition occurs outside this country. We comply with the applicable legal framework conditions.

In connection with competition and antitrust law, the following guidelines apply at our company:

- We always comply with current and applicable competition laws and do not interfere with or hinder competition through anti-competitive practices.
- We never enter into agreements or arrangements that conflict with applicable competition and antitrust laws or are in any shape or form anti-competitive. In particular, we discourage the following practices:
    i. Price fixing (in any form) with market participants;
    ii. Market sharing agreements (allocation of customers, territories, and tenders) with market participants;
    iii. Exchange of commercial information with market participants that promotes or facilitates price fixing and/or market sharing between them.
- We consult with our supervisor and the Legal Department before engaging in discussions with market participants that may create an anti-competitive impression.
- The exchange of non-public or other sensitive information with customers and other third parties is only allowed if it is necessary for legitimate business purposes and a valid confidentiality agreement is in place.
- We only collect information about market participants in a reasonable and lawful manner.
- Suspicions or allegations of actual or potential anti-competitive conversations or actions must be reported immediately to supervisors and Compliance Management.
- In case of doubt, we consult our Legal department for advice.

3.3 International Trade

We comply with the applicable foreign trade regulations to ensure a smooth flow of goods

The exchange of goods, whether within a country or across borders, may be subject to customs, trade and/or re-/export control regulations.

Hamilton is committed to complying with all customs, trade, and re-/export control regulations; allowance is also made for potential conflicts between the regulations in the different countries in which we operate. Failure to comply with such provisions may result in civil and criminal penalties, up to and including the loss of export licenses.

As a global company, we process import, export, and transit transactions of a variety of goods on a daily basis. Our Order Processing and Logistics department process the deliveries of goods such that all the associated applicable regulations are observed. We observe customs regulations regardless of the type of goods, quantities, or means of transport. We are responsible for providing complete and truthful information for export or import processing.

Hamilton employees involved in foreign trade activities must refrain from engaging in transactions that are deemed prohibited by national or international export regulations or the Hamilton Internal Compliance Program for Export Controls (IPC).

Before we enter into a business relationship with new business partners, we verify that there are no entries in national or international banned lists. Before exporting commercial, but also complimentary goods, we make sure that the items in question are not subject to any restrictions and that no export/re-export permit is required from the authorities. Some destinations are subject to foreign trade restrictions, such as embargoes or sanctions, and require additional inspections before any further action can be taken.

In connection with international trade, the following guidelines apply at our company:

- We communicate truthful and complete information in a timely manner.
- When developing or reviewing business processes, they are also reviewed for compliance with national and international customs, trade and re/export control regulations.
- We contact the relevant department within the organization at an early stage.
- We inform ourselves at an early stage whether the delivery of specific goods to particular regions is subject to restrictions or prohibitions. The Export Risk Management employees are readily available to provide advice and support.
- When we identify potential violations of foreign trade regulations, we contact the appropriate department to address a potential violation.

3.4 Fraudulent Behavior

We do not tolerate fraudulent behavior

We do not tolerate fraudulent behavior or deception to gain an advantage, to evade obligations, or to harm third parties. We expect our employees as well as our business partners to distance themselves from fraudulent behavior.

In connection with fraudulent behavior, the following guidelines apply at our company:

- We distance ourselves from fraudulent behavior.
- Instances of fraud must be reported to the supervisor(s) as well as to Compliance Management.
- Instances of fraud must be investigated immediately by Compliance Management, and where appropriate, individuals must be prosecuted under criminal law.

3.5 Protection of Personal Data

We comply with all relevant legal regulations on the protection of personal data

We respect the privacy of our customers, suppliers, employees, applicants, and other persons with whom we have a business relationship or with whom we come into contact. Data are valuable elements for us in developing innovative approaches and help us optimize business processes. If it is necessary to process personal data in order to provide a service or fulfill a contractual obligation, we only collect data that is absolutely necessary for the respective processing purpose. We are committed to collecting data in a way that is lawful, fair, legitimate and ethical and we always respect individual privacy.

We address data security in the context of appropriate process specifications and design of our data storage and data processing systems. We also ensure data security by safeguarding compliance with all applicable data protection standards worldwide.

In connection with personal data, the following guidelines apply at our company:

- We ensure that personal data are processed with all due care and in accordance with the applicable laws.
- Only data about individuals that is directly related to Hamilton’s business or the use of Hamilton products shall be collected.
- We only process personal data for the purpose for which the data was provided or collected.
- We never store personal data longer than necessary.
- We comply with all data protection and related laws applicable in the countries where we collect and store personal data.
- If there is any doubt about how we may use personal data, you should seek advice and approval from the Legal department or HR before collecting, processing, and using such data.

3.6 Correct Reporting and Accounting

We communicate accurate and fair information regarding our products, services, and business activities

We communicate information accurately, timely, and appropriately. We also keep proper accounting ledgers and maintain accurate records. Data integrity is essential to our business operations. Hamilton ensures that all data, information, and documents that we produce or that are our responsibility are correct and fair. This principle applies to every type of document we produce, such as reports, research and development data, or our e-mails.

We are committed to complying with applicable laws and internal accounting and reporting guidelines. We ensure that all information provided on our behalf is truthful. We make sure that no false or misleading statements or information are made at any time.

Falsifying reports, records, and data or misrepresenting facts is an act of fraud. In addition to Hamilton's responsibility as a company, employees who participate in such acts also assume responsibility and will be subject to penalties.

In connection with correct reporting and accounting, the following guidelines apply at our company:

- We ensure that all information we produce or is published by us is accurate, fair, and complete.
- We ensure that no false or misleading facts appear in any report, publication, or other document at any time.
- We only communicate on behalf of Hamilton when we are authorized to do so. This includes communications about Hamilton or Hamilton's products on the Internet or other electronic media.
- Releasing company-related information to the public, except for information on products, must be coordinated with the respective responsible Corporate Communications and Marketing Communications departments.
- Media requests for information about the company, except for inquiries about products, must be forwarded to the respective responsible Corporate Communications and Marketing Communications departments.

3.7 Quality Policy and Quality Management

Our business activity depends on meeting high quality standards

We are committed to maintaining high quality standards at all times and in all places. Quality is the right of all our customers and at the same time the duty of all Hamilton employees. We are committed to complying with legal and regulatory provisions and internationally recognized standards and wish to meet our stakeholders' high expectations in terms of the quality, safety and effectiveness of our products and services. This can only be achieved with a total commitment to quality, from the first customer contact through development, production, distribution and installation all the way to maintenance and problem solving at the customer's premises.

Hamilton has a quality management system with mandatory quality standards and processes for all employees. In addition, our quality policy means we are committed to continuous improvement in both product quality and safety for our customers and their satisfaction and in our own internal procedures and processes.

In the event of discrepancies, we notify both our supervisors and Quality Management as soon as possible, so an appropriate solution can be found to remedy the discrepancy.
In connection with quality policy and quality management, the following guidelines apply at our company:

- We ensure compliance with the quality standards expected.
- Each individual employee is responsible for the quality of the work they do. Responsibility for quality cannot be delegated.
- We are committed to complying with legal and regulatory provisions and internationally recognized standards.
- We are committed to continuous improvement, both in our product quality and in our internal procedures and processes.

3.8 Conflict of Interest

Our professional judgment must not be unduly influenced through personal interests

A conflict of interest may occur when personal interests conflict with the interests of the Hamilton companies, resulting in conflicts of loyalty. Both our own activities and those of persons who are close to us or relatives may give rise to conflicts of interest. We, as Hamilton employees, must avoid situations in which our own interests conflict or might conflict with Hamilton's interests. We do not abuse our employment or position with Hamilton to reap unwarranted personal benefits for ourselves, relatives, or loved ones.
We must carefully take into consideration potential conflicts of interest before, for example, entering into a secondary employment relationship. Personal interests must not infringe on the fiduciary duty to Hamilton, compete with Hamilton, and/or deplete the work force. Secondary employment for compensation outside of Hamilton, membership on a board of directors or on an executive committee of profit-making companies, as well as public offices, are subject to the approval of management.
In case of a conflict of interest, we would inform our supervisors as soon as possible so that an appropriate solution could be reached.
In connection with avoiding conflicts of interests, the following guidelines apply at our company:

- We avoid situations where our personal interests might conflict with those of Hamilton.
- Any employment or position with Hamilton must not be used for one's own personal benefit, or for the benefit of relatives and/or acquaintances.
- We immediately inform our supervisors of any actual or potential conflicts of interest so that a suitable solution can be found.

3.9 Gifts and Entertainment

We graciously decline gifts or offers of entertainment in return for official services

Gifts, even if given out of a personal or professional relationship, might be misconstrued and perceived as an attempt to exert undue influence. This also applies to invitations to meals, events, or when travel and accommodations are paid for.

Hamilton employees are prohibited from accepting money or gifts for work-related tasks. We are also not allowed to procure advantages from third parties in a direct or indirect manner or to have such advantages promised to us. If we still receive money or other benefits from third parties, we must immediately report this to Hamilton and turn everything in.

At the same time, we must not offer gifts or entertainment that may raise doubts about our personal integrity or the integrity and independence of Hamilton.

We intend to avoid both the facts and the impression of unfair business relations with existing or potential business partners. In connection with gifts and entertainment, the following guidelines apply at our company:

Offering Gifts and Entertainment:

- Gifts or offers of entertainment may only be offered provided they are appropriate and do not create the impression that the recipients have been influenced in their decision-making.
- Gifts must be of negligible value and entertainment must not exceed a reasonable limit. Lavish or inappropriate gifts or entertainment are prohibited.

Accepting Gifts and Entertainment:

- Soliciting or requesting gifts or entertainment is prohibited. This not only includes valuables, but benefits of every kind.
- We are not allowed to accept money or other gifts for official business. Any received gifts must be reported and turned in to the supervisor immediately.
- Any entertainment received must be reported to the supervisor and may be accepted if it occurs during the normal course of business, cannot be interpreted as lavish and is within reason.

3.10 Insider Trading

We protect non-public information and never use it for trading purposes

Insider information is non-public information about Hamilton or its business partners that would play a decisive role in a third party's decision to buy or sell equity securities in a company. Insider information may, for example, include financial results, information about possible mergers, acquisitions, divestments, capital increases, capital market transactions, important licensing agreements, patent applications, or collaborations.

We are prohibited from trading with insider information for our own profit as well as for the profit of third parties. Confidential information related to the business operations of Hamilton or its business partners is to be kept confidential and is not to be disclosed to unauthorized persons inside or outside the company. We are expressly advised that the duty of confidentiality remains in force in its entirety after employment with Hamilton has ended.

We ensure that non-public information acquired in the course of doing business for Hamilton is not used for improper purposes. We or persons affiliated with us are prohibited from trading shares or encouraging anyone to make a decision to trade shares, based on such inside information.

In connection with insider trading, the following guidelines apply at our company:

- We protect insider information and do not distribute it further.
- We do not trade in shares of companies on which we have insider information through our business activities. We also do not provide trading suggestions to non-insiders.
- If we have any questions or uncertainties concerning the scope or application of Hamilton's insider trading provisions, we contact our respective supervisors or the Legal department or Compliance Management.

4. Company Assets

4.1 Intellectual Property

The protection of intellectual property is paramount for us

Hamilton companies specialize in designing, manufacturing and the customized configuration of precision measurement devices, automated fluid handling workstations, automated sample management systems, and intelligent ventilation solutions. Innovation lies at the heart of our business, which is why we rely on intellectual property rights and their effective protection.

Patents, trademarks, registration data, copyrights, and trade secrets are precious assets for us. Intellectual property laws protect such assets. We support the advancement of a legal and regulatory environment in which intellectual property rights are protected.

We highly value the rights of our own intellectual property and at the same time are committed to respecting intellectual property of third parties. We expect all our employees to safeguard and protect the rights of our intellectual property while respecting intellectual property of third parties.

Our intellectual property must only be used for us to properly conduct our business and to further develop our business. Intellectual property rights must not be used for personal gain or fraudulent purposes.

In connection with intellectual property, the following guidelines apply at our company:

- We preserve and protect the intellectual property rights of Hamilton companies.
- We respect the intellectual property rights of third parties and consult internal experts whenever in doubt.
- In the event of suspected violations or actual violations of the Hamilton companies' intellectual property rights, supervisors, as well as management, must be notified.

4.2 Confidential Information

We treat confidential information with the utmost care in the interest of Hamilton

We have access to confidential information within the context of our business activities. Confidential information may include, for example, information on research or development projects, production processes, business plans, financial data, marketing strategies, as well as new product launches, etc. We must treat Hamilton's confidential information, or confidential information shared with the company by customers and business partners in the context of our collaboration with the utmost care and ensure that it is not inappropriately disclosed to outsiders.

Confidential information constitutes significant assets and requires careful protection. We are bound by employment law to protect confidential information. In addition, we take appropriate measures to ensure the confidentiality of the information and to prevent the inadvertent dissemination of such information.

In connection with confidential information, the following guidelines apply at our company:

- Confidential information must always be protected from unauthorized access and inadvertent disclosure.
- Confidential information may be shared only with those who require the information and are authorized to receive it.

- Confidential information may only be shared with third parties for approved business purposes and based on a written confidentiality agreement.
- The provisions for handling confidential information continue to apply to us even after the employment relationship has ended.

4.3 Social Media and Electronic Communication Tools

We take the necessary care when using social media and electronic communication tools

The term “electronic communication tools” covers all of the company’s devices such as smartphones, computers, tablets, infrastructure and collaboration tools, including e-mail, chat and social media. Business communications must only take place via the electronic communication tools provided. All new technology services, systems and platforms intended for business dealings must be checked and approved by Hamilton ICT before they are deployed, as must software and communication tools operated by third parties. The infrastructure provided is used primarily for business activities and must only be used for personal use if this does not involve any expense or disadvantage for Hamilton. Electronic communication tools must be used with proper care. If devices or data are stolen or otherwise lost (e.g. as a result of a violation of security measures, phishing or unintentional exchange of data), Hamilton ICT must be notified immediately.

Hamilton’s Corporate Communications and Marketing Communications departments are generally responsible for designing and operating official, external Hamilton channels on social media. We are free, however, to maintain our own private channels. We need to remember, however, that the Internet does not forget anything. If someone criticizes us, we should remain objective. Whenever we use social media, we identify ourselves with our first and last names and a photo. Company and business secrets have no place on social media platforms, nor do disagreements and problems, which we discuss internally at Hamilton.

In connection with social media and electronic communications, the following guidelines apply at our company:

- Only the electronic means of communication provided by Hamilton will be used for business purposes.
- Employees are allowed to use personal devices to access Hamilton data. Storing Hamilton data on personal devices, however, is prohibited.
- Electronic communication tools belonging to Hamilton are used with due care and primarily for business purposes. They are only used for private purposes if there is no negative impact on Hamilton.
- Hamilton’s official social media channels are designed and maintained by the Corporate Communication and Marketing Communication departments.
- We use our private social media channels responsibly.

5. Corporate Responsibility

We take responsibility by implementing our high standards of conduct

Hamilton assumes responsibility by considering the consequences of our business decisions and activities in economic, social, and environmental terms. During our business operations, we are bound by universally accepted ethical values and principles, such as integrity, honesty, and respect for human dignity.

5.1 Hamilton's Understanding of Sustainability

Our contribution to the healthy development of society

Since the company was founded in the 1940s, the Hamilton companies have made a major contribution to healthcare through numerous innovations. As a result, we have grown into a company with operations all over the world. Hamilton's commitment to sustainability includes developing and delivering innovative, leading-edge technology that improves lives, fostering the health of our customers and employees, acting as a conscientious steward of natural resources and focusing on long-term success as a family-owned business.

The long-term perspective of the Hamilton family, which has maintained ownership of the companies to this day, allows us to make our contribution to good, long-term healthcare in accordance with the vision statement "We drive innovation to improve people's lives". In our daily work, we contribute to the development of new medicines, diagnostics, and personalized medicine. Compliance with ethical principles, the integrity of our employees and the company, and responsible conduct are at the core of our business activities.

We work together with our employees to promote the sustainable development of our society. Hamilton's identity includes behaving in an exemplary manner with regard to environmental protection, ensuring good working conditions, and fostering social welfare. As a manufacturing company, we are part of our environment. At all our locations, we implement and strive to continuously improve our high environmental standards in development and production.

In connection with sustainability, the following guidelines apply at our company:

- We proactively incorporate the commitment to sustainability into our everyday work.
- We conduct ourselves responsibly and base our work on economic success, social justice, and ecological responsibility.
- We serve as Hamilton's sustainability ambassadors both inside and outside the company.

5.2 Compliance at Hamilton

We advocate honesty – at all times and in all places

Hamilton's highest priority is compliance with the applicable laws, other legal regulations and integrity standards in all countries where we operate, which serves as the basis and prerequisite for our license to operate. We also want to avoid the impression that our employees are engaging in non-compliant conduct. The basis for compliance at Hamilton is a sense of responsibility on the part of all employees. Compliance risks for which we are responsible must be continuously and appropriately identified, assessed, and dealt with according to the severity of the risk.

We enforce our integrity standards around the world in order to meet our commitment to conduct our business in an environmentally and ethically responsible manner. Hamilton Bonaduz AG, Hamilton Medical AG, Hamilton Storage GmbH and Hamilton Services AG are based in Switzerland. In countries with an institutional framework that is weaker than in Switzerland, we consider which good standards for responsible corporate governance could be applied to provide support.

We prevent non-compliant behavior by uncovering it if necessary and reacting accordingly. This Code of Conduct defines the minimum standards of behavior that we must follow. This Code of Conduct in no way supersedes or overrides any applicable laws and regulations.

In connection with compliance, the following guidelines apply at our company:

- We ensure that we comply fully with applicable laws and framework conditions throughout our business activities.
- We address and report any violations of applicable laws or framework conditions.

5.3 Human Rights

We are committed to advancing and respecting human rights

True to our vision statement, we at Hamilton are committed to improving people's lives every day. We must respect and advance human rights along the entire value chain in order to achieve this.

Human rights as defined in the Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948, are an integral component of our business activities. We respect them at all times and everywhere we operate. The UN Human Rights Council approved the UN Guiding Principles on Business and Human Rights (UNGPs) in 2011. The UNGPs include the following three pillars: "protect, respect, and ensure legal protection".

These guiding principles are based on the acknowledgment of

i. the existing obligations of states to respect, protect, and ensure human rights and fundamental freedoms;
ii. the role of business organizations as specialized organs of society that exercise specialized functions and, as such, must comply with all applicable law and respect human rights;
iii. the necessity of confronting rights and obligations with adequate and effective remedies in the event of their violation.

Hamilton recognizes, supports, and respects the UN Guiding Principles on Business and Human Rights (UNGPs). In addition, we support the principles of the UN Global Compact and follow the International Labor Organization (ILO) Universal Declaration on Fundamental Principles and Rights at

Work. We will not tolerate any violations of human rights. We will take immediate and appropriate corrective action.

In connection with human rights, the following guidelines apply at our company:

- We respect and advance human rights within our sphere of influence.
- We will report and address any suspected human rights violations.
- We carry out risk-based due diligence on business partners.

6. Advice & Help, Contacts, and References

6.1 Advice & Help

If we are not sure, we ask the right questions

We may, at times, encounter situations during our daily work that are not explicitly explained in the Code of Conduct or in the documents to which it refers. If we are not sure about the right behavior in our daily business, we ask ourselves the following questions:

- Is my behavior correct and lawful?
- Is my behavior in line with Hamilton's corporate values?
- Does my behavior comply with Hamilton's Code of Conduct?
- Could my behavior have any adverse effects for Hamilton or myself?
- How would I feel if someone treated me in the same way?
- How would I feel if my behavior became public?

In most cases, these questions should be adequate and provide a framework for addressing the right behavior. If we still have doubts or uncertainties about the right behavior, we ask for advice and help. We welcome any and all questions. This is how we prevent non-compliant behavior. Managers are responsible for ensuring that all employees reporting to them are provided with the assistance and advice they need to comply with Hamilton's Code of Conduct.

In connection with advice and help, the following guidelines apply at our company:

- We solicit advice and assistance from our supervisors, the Compliance department or HR in case of doubt regarding proper conduct in business dealings.
- We offer advice and assistance to employees who report to us.

6.2 Reporting Concerns

Addressing concerns is always the right thing to do

We may encounter situations that appear to violate the Code of Conduct or other internal directives and legislation. We have a duty and responsibility to report any suspected violations. When we openly address concerns, we act properly and according to Hamilton's corporate values. Supervisors must be notified of any wrongdoing or integrity issues so that they can address them in a timely and appropriate manner.

Compliance issues are raised primarily with line managers. If this is not possible for any reason, we contact the next supervisor, HR or Compliance Management. Concerns, observations and violations of integrity can also be reported in writing and anonymously via the Whistleblowing Hotline at https://hamilton.integrityline.io. No retaliatory actions will be tolerated against employees who have raised concerns. The same applies to the abuse of the opportunity to raise concerns.

In connection with reporting concerns, the following guidelines apply at our company:

- We openly address compliance concerns when we believe in good faith that someone is doing, has done, or will do something that violates Hamilton's Code of Conduct.

6.3 Compliance Management

The employees of Compliance Management offer us support

The Director of Compliance and the Compliance Management employees ensure that Hamilton's Code of Conduct is consistently observed and implemented. The Director of Compliance also serves as the point of contact for management, employees, business partners, customers, and the public on issues related to Hamilton's Code of Conduct.

The Director of Compliance is responsible for performing compliance monitoring, controls and audits, and coordinating the various compliance activities, initiatives, as well as training programs. In addition, they also support the line managers with regard to risk management in connection with integrity issues and in the adequate handling of non-compliant incidents. Compliance Management ensures that all employees know exactly where to go for advice and assistance if they have questions concerning proper business conduct and also encourages employees to raise compliance concerns.

In connection with Compliance Management, the following guidelines apply at our company:

- We contact Compliance Management employees or the Director of Compliance for advice and assistance, as well as to raise any compliance concerns.
- Concerns can also be reported in writing and anonymously at any time via the Whistleblowing Hotline at https://hamilton.integrityline.io.

6.4 Adressing Compliance Reports

Our Compliance Management puts a high priority on processing reports

We expect all our employees to conduct themselves in accordance with the rules. Violations of the Code of Conduct will be dealt with as a matter of urgency and those responsible held to account. We take any and all allegations seriously and investigate them in an efficient and timely manner. When investigating allegations, we assess facts in an objective and unbiased manner. If any allegations are true, appropriate corrective action will be taken immediately and sanctions will be imposed where necessary. Every accused employee has the right to be interviewed. All employees concerned are presumed innocent until a violation of the Code of Conduct has been proven.

Compliance Management is responsible for investigating allegations in conjunction with line managers and HR. The Director of Compliance must report non-compliant incidents directly to senior management as soon as they are received, so that they can take note of violations from the initial report through to the resolution stage as well as track and monitor how they are being handled.

In connection with addressing compliance reports, the following guidelines apply at our company:

- We do everything we can to prevent non-compliant behavior.
- If violations are reported, the accused employees will cooperate in the investigation of the violations to allow the case to be resolved quickly.
- If the allegations prove to be true, appropriate corrective action will be taken.

6.5 Contact Persons

You can find the current names and contact details of Compliance Management, HR Management, Quality Management, Legal, and Intellectual Property Management on Hamilton's myDesk intranet.
For advice on private, personal or business issues, employees in Switzerland can also contact the external counseling center operated by Movis (www.movis24.ch).
Concerns, observations and violations of integrity can also be reported in writing and anonymously at any time via the Whistleblowing Hotline.

IntegrityLine (24/7):	https://hamilton.integrityline.io
Telephone:	+41 44 523 15 88
E-Mail:	meldestelle-hamilton@integrityplus.ch
Mail:	IntegrityPlus – Meldestelle Josefstrasse 59 8005 Zürich

6.6 More Information and References

You can find more information and documents on the individual chapters of the Hamilton Code of Conduct on the Hamilton intranet, in the "Employee Handbook", the "Management Handbook", and on our websites (www.hamiltoncompany.com; www.hamilton-medical.com) if they are publicly accessible.