

QuidelOrtho Corporation

Supplier and Distributor Code of Business Conduct and Ethics



QUIDELORTHO CORPORATION

SUPPLIER AND DISTRIBUTOR CODE OF BUSINESS CONDUCT AND ETHICS

I. INTRODUCTION

At QuidelOrtho Corporation (together with its subsidiaries, the "**Company**"), we enable our customers to optimize long-term value for patients through our innovative solutions and services. We do that by reimagining what is possible, and by conducting our business with honesty, integrity and the highest standards of business ethics, and we expect our vendors, service providers, contractors, consultants, representatives and any of their respective employees or subcontractors ("**Suppliers and Distributors**") to share these values.

This Supplier and Distributor Code of Conduct and Ethics (this "**Code**") sets forth the requirements and expectations that the Company has for Suppliers and Distributors. It is important that each Supplier and Distributor comply with the Company's policies concerning ethics and business conduct. The Company expects its Suppliers and Distributors to have a clear understanding of our expectations and to comply with those expectations when doing business with the Company. Suppliers and Distributors are expected to fully comply with the principles set forth in this Code as a condition of doing business with the Company. In addition, Suppliers and Distributors are expected to implement and maintain a management system that facilitates compliance with the principles set forth in this Code, identifies and mitigates related risks and enables continual improvement.

If, in the course of business with the Company, a Supplier or Distributor sees a Company employee or Supplier or Distributor engaged in known or suspected unethical behavior or violation of applicable laws or this Code, Suppliers and Distributors should contact the QuidelOrtho Ethics Hotline as soon as possible, which is available 24 hours a day, 7 days a week at 1-855-224-8332 or https://secure.ethicspoint.com/domain/media/en/gui/40349/index.html. The Company prohibits retaliation against any Supplier or Distributor reporting a concern.

The Company thanks you for your cooperation, and we look forward to our continued business relationship.

II. EXPECTATIONS OF SUPPLIERS AND DISTRIBUTORS

The following sets forth the Company's expectations regarding the business practices of our Suppliers and Distributors. These expectations are consistent with the Company's Code of Conduct and Ethics. The information summarized in this Code is not exhaustive, and, as such, there may be other conduct not specifically described that will be considered unacceptable for a Supplier or Distributor.

- A. Laws, Regulations and Industry Standards
 - 1. <u>Compliance With All Applicable Laws, Regulations and Industry</u> Standards

All standards set forth in this Code are subject to compliance with applicable local

laws, regulations and industry standards. We expect our Suppliers and Distributors to operate in full compliance with the laws, regulations and industry standards of all countries in which they conduct business or to which they are subject. Among these standards are recognized industry codes of conduct, such as the Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code"), published by the Advanced Medical Technology Association ("AdvaMed"), and the MedTech Europe (Code of Ethical Business Practice, published by MedTech Europe ("MedTech Europe").

Suppliers and Distributors must not engage in activities that would violate any applicable laws or regulations, including those relating to:

- Bribery, corruption or other illegal payments
- Unfair competition
- Unfair or deceptive trade practices
- The environment
- Data privacy and confidentiality of information of workers, patients, clinical trial participants and others
- Integrity, confidentiality and availability of IT assets (such as a server or a segment of the network)
- Health and safety
- Registration, Evaluation, Authorization and Restrictions of Chemicals (REACH)
- Restriction of Hazardous Substances (RoHS)
- Conflict minerals
- International trade, including imports, export controls and economic sanctions
- Money laundering
- Employment and discrimination
- Healthcare regulations
- Debarment
- Contracting and doing business with government entities
- Forced and child labor
- Human rights

If any requirement that the Company imposes in this Code conflicts with local laws, the local law takes precedence; however, should this occur, Suppliers and Distributors must promptly inform the Company of the conflict.

In addition, Suppliers and Distributors must not violate, misappropriate or infringe upon intellectual property rights of the Company or any other third party.

2. <u>Trade Compliance</u>

Suppliers and Distributors must conduct their business in compliance with all applicable trade laws and regulations including anti-boycott laws, sanctions and export control laws and regulations, promulgated and enforced by the United States, the European Union, the United Kingdom, Canada and other applicable jurisdictions followed by QuidelOrtho Corporation. In this regard, Suppliers and Distributors must comply with all applicable laws and regulations that prohibit or restrict interactions

with designated or restricted individuals, groups or entities.

B. Employment Standards

Suppliers and Distributors must treat their employees with respect and dignity and maintain a safe workplace. Employees must not be subject to physical, verbal, sexual, or psychological harassment or abuse or treated in violation of any applicable law or regulation. Employees must also be free to exercise their legally protected rights and freedoms.

1. Safe and Healthy Workplace

Suppliers and Distributors must provide their employees with a safe and healthy workplace consistent with all applicable laws and regulations. Suppliers and Distributors must endeavor to meet or exceed international safety standards. We expect Suppliers and Distributors to identify and assess emergency situations that may impact their employees' workplace and minimize potentially adverse consequences, including but not limited to fire hazards, by implementing and maintaining effective emergency plans and procedures.

2. Discrimination

Suppliers and Distributors must not discriminate against their employees or applicants for employment with respect to compensation, terms, conditions or privileges of employment on the basis of race, color, religion, national origin, gender (including pregnancy), age, disability, veteran status, marital status, citizenship status, creed, sexual orientation or any other protected category, as provided by law.

3. Wages, Benefits, Hours

Suppliers and Distributors must, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime and other required elements of compensation, and must provide all legally mandated benefits. Suppliers and Distributors must maintain work hours in accordance with applicable laws and regulations.

4. Forced and Child Labor

Suppliers and Distributors must not use forced or involuntary labor whether in the form of prison labor, indentured labor, bonded labor, or any other form of slavery or human trafficking. Suppliers and Distributors must comply with all applicable minimum age laws and requirements and will not employ child labor. We expect the employment of young workers above a country's legal age for employment to involve non-hazardous work, and to not hinder their education or health. Employee files should be maintained with adequate data to verify the ages of employees.

C. Ethical Business Standards

1. Environment

Suppliers and Distributors should provide goods and services in an environmentally

conscientious manner. Suppliers and Distributors must obtain all applicable permits, licenses and registrations.

Suppliers and Distributors must have systems in place to ensure the safe handling, movement, storage, disposal, recycling, reuse or management of raw materials, waste, air emissions and wastewater discharges. In this regard, Suppliers and Distributors must implement effective measures to prevent and mitigate spills and releases into the environment, while ensuring that air, noise and odor pollution are maintained in accordance with applicable laws and regulations.

2. Responsible Use of Resources

Suppliers and Distributors must take measures to use natural resources in an efficient way in order to minimize the wasteful consumption of resources. Suppliers and Distributors should take adequate steps to incorporate sustainable materials into their manufacturing and operations. Furthermore, Suppliers and Distributors must conduct due diligence on the sourcing of raw materials to foster legal and sustainable sourcing consistent with ethical business standards as set out in this Code.

Due to the increased concerns regarding human rights abuses resulting from mining operations involving "conflict minerals," we expect our Suppliers and Distributors to conduct adequate due diligence as to the source and chain of custody of "conflict minerals" used in materials or products supplied to the Company.

3. Human Rights

Suppliers and Distributors must maintain policies and/or management procedures to detect and prevent any human rights violations, including conducting appropriate due diligence to identify potential human rights violations, and to remedy any adverse human rights impacts resulting from their business activities.

4. Anti-Corruption and Anti-Bribery

Suppliers and Distributors must not engage in any form of bribery, whether involving the public or private sectors. In addition, Suppliers and Distributors must not offer or provide, directly or indirectly, anything of value to a government official or to anyone acting on behalf of a transaction counterparty, in order to obtain an undue business advantage. Anything of value includes but is not limited to cash or cash-equivalent payments, gifts, entertainment, travel, and employment or internships.

Suppliers and Distributors shall not provide any kickbacks or bribes to any Company employee or representative. If a Company employee or representative solicits a kickback or a bribe from a Supplier or Distributor, the Supplier or Distributor must immediately report the solicitation to the QuidelOrtho Ethics Hotline.

5. Antitrust and Fair Competition

Suppliers and Distributors must comply with all applicable antitrust and fair competition laws consistent with the Company's commitment to ethical business practices.

6. Gifts and Entertainment

Unless pre-approved in writing by the Company, Suppliers and Distributors must not give, authorize, promise, or offer any gifts or entertainment on behalf of the Company to any other entity or individual. Similarly, Suppliers and Distributors shall not be entitled to reimbursement for any gifts or entertainment offered for or on behalf of the Company to any other entity or individual without written pre-approval. All gifts and entertainment-related expenditures must be fairly and accurately recorded in the Supplier's or Distributor's books and records.

D. Subcontractors

Distributors must disclose to the Company all subcontractors used in connection with work for or on behalf of the Company. Suppliers may also be required to disclose such relevant subcontractors upon the Company's request. Any subcontractor retained by a Supplier or Distributor must comply with this Code, and the Supplier or Distributor is responsible for training its subcontractors on this Code and for ensuring that the subcontractor understands and complies with this Code.

E. <u>Conflict of Interest</u>

Suppliers and Distributors must timely disclose to the Company any actual or potential conflicts of interest that may affect its performance to the Company or are otherwise related to their business relationship with the Company, as well as situations that could be perceived as a conflict of interest. A conflict of interest typically occurs when the personal interest of any employee of the Company or of the Supplier or Distributor or its employees interferes with its ability to perform its duties to the Company. For instance, if an employee of the Company is a shareholder, director, business partner or employee of a Supplier or Distributor, this could give rise to a conflict of interest.

F. Records and Systems

1. Data Privacy and Cybersecurity

Suppliers and Distributors must ensure that any data processed, transmitted or transferred in connection with their business with or related to the Company is done so in a manner that complies with all applicable data privacy laws and regulations.

Suppliers and Distributors must establish and maintain appropriate security measures, procedures and controls to detect and prevent any cyber-intrusion that may result in improper access to data or Company information. Suppliers and Distributors must implement and rely on security measures reflecting best practices and industry standards that comply with applicable information security laws and regulations. Security measures need to effectively protect data and the system's confidentiality, integrity and availability. Moreover, Suppliers and Distributors must monitor the effectiveness of their cybersecurity posture and promptly remediate any deficiencies to ensure the effectiveness of its cybersecurity program. As part of our commitment to maintaining high security standards, the Company may request the opportunity to review a Supplier's or Distributor's relevant security measures and practices to ensure they align with our expectations and regulatory requirements.

2. Accounting Records

Suppliers and Distributors must create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements. Accounting records must, in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses.

III. MONITORING AND ENFORCING COMPLIANCE WITH THIS CODE

To ensure compliance with this Code, Suppliers and Distributors must provide training to their employees or ensure that their employees attend any training sessions offered by the Company to its third parties.

Suppliers and Distributors must be able to demonstrate compliance with this Code at the request and to the reasonable satisfaction of the Company, including through surveys, audits, on-site inspections of facilities and/or review of relevant books and records. Suppliers and Distributors must correct promptly any errors or omissions disclosed by any such audit or inspection.

Suppliers and Distributors must notify the Company immediately upon learning that it or any person or entity undertaking any act in furtherance of its relationship with the Company has breached or may breach this Code.

Non-compliance with this Code, and any litigation, investigation or government request for information regarding a violation or potential violation of law or regulation, must be reported immediately to the QuidelOrtho Ethics Hotline.

The Company reserves the right to investigate suspected violations of this Code and the Supplier and Distributor must cooperate with the Company's requests for information in connection with any such investigation.

The Company reserves the right to terminate its business relationship with any Supplier or Distributor who fails or refuses to comply with the requirements of this Code.

Effective Date: November 30, 2024

