



# Code Of Ethics And Business Conduct

Bringing our values to life

**meridian** BIOSCIENCE®





# Contents

<b>INTRODUCTION</b>	<b>4</b>
Code Of Ethics And Business Conduct.....	4
Message From Our Leadership.....	5
<b>SECTION 1: DOING WHAT IS RIGHT</b>	<b>7</b>
Why Do We Have A Code Of Ethics? .....	8
Strive To Be An Ethical Leader .....	9
Speak Up .....	10
Zero Tolerance For Retaliation .....	11
<b>SECTION 2: ACT WITH INTEGRITY</b>	<b>13</b>
Conflicts Of Interest.....	14
Misappropriation Of Corporate Opportunities .....	15
Confidentiality .....	16
Protection And Proper Use Of Meridian Assets. ....	17
Protecting Personal Data .....	18
Insider Trading.....	18
<b>SECTION 3: IN OUR WORKPLACE</b>	<b>19</b>
Respect In The Workplace .....	20
Inclusion And Diversity.....	21
Discrimination And Harassment In The Workplace ..	22
Maintaining Accurate Records And Record Retention. .	23
Social Media Policy .....	24
Safety In The Workplace .....	24

<b>SECTION 4: IN THE MARKETPLACE</b>	<b>25</b>
Compliance With Laws.....	26
Anti-Bribery And Corruption.....	26
Anti-Money Laundering .....	27
Preventing Theft And Fraud .....	28
Gifts And Entertainment.....	29
Dealing Ethically With HCPs, HCOs And Government Officials.....	30
Ethically Engaging Third Parties.....	31
Trade Controls.....	32
Fair Dealing And Fair Competition .....	34
Product Promotion .....	35
Product Safety .....	36
<b>SECTION 5: GLOBAL RESPONSIBILITY</b>	<b>37</b>
Respecting Human Rights .....	38
Sustainability .....	39
Purchasing Practices: Conflict Minerals .....	40
Lobbying And Political Activity.....	41
Charitable Contributions And Sponsorships .....	42
<b>CONCLUSION</b>	<b>44</b>

## Code Of Ethics And Business Conduct

Meridian Bioscience, Inc., together with its global subsidiaries and affiliates (collectively, "Meridian") is committed to upholding the highest standards of ethical conduct and integrity in its business activities. This Code of Ethics and Business Conduct (the "Code") applies to all of Meridian's directors, officers, employees, consultants, contractors, temporary workers, other personnel and any third-party agents and affiliates (collectively, Meridian's "employees and business partners"). It also describes the methods and manners in which employees and others can raise questions and concerns about the Code or ethical business practices, generally. The Code is maintained and owned by Meridian's Chief Compliance Officer. The Code will be reviewed at least annually by Meridian's Compliance Review Board to ensure that it remains current.

### **Meridian strives to meet the following quantitative objectives:**

1. 100% of new employees review and acknowledge the Code within 90 days of beginning employment
2. 100% of existing employees review and acknowledge the Code annually, prior to December 31 of each year
3. 100% of Managers receive and acknowledge training regarding the Code each year prior to December 31



**Andy Kitzmiller**  
Chief Operating Officer and  
Chief Financial Officer



**Lourdes Weltzien, Ph.D.**  
President, Life Science



**Tony Serafini-Lamanna**  
President, Diagnostics

## Message From Our Leadership

We work in one of the most dynamic industries in the world. The products we make are an integral part of the global healthcare system, and we have the capability to change lives for the better.

Our purpose comes with enormous responsibility, and how we deliver on this promise is just as important as what we ultimately accomplish. When we say, "Doing what is right", we mean it. This is the foundation of the Code, which guides every decision we make, every action we take, and every interaction we have with our customers, our business partners, our communities, and each other. It is the reason customers trust us, and why business partners, governments and community leaders want to associate with us.

Our Code provides direction on how we must behave in various situations, and it applies to all of us, equally.

Nothing is more essential to our success than doing what is right. This includes speaking up when we have concerns and seeking help when we have questions.

Our Code describes our mandatory, consistent, global principles for doing the right thing. Please read it carefully. It is imperative that you understand your role and your responsibility to doing what is right. By familiarizing yourself with the Code and following these guidelines, you will be taking an important step in helping us achieve our collective goals, while making a positive difference in the world.

*Andy Kitzmiller Tony Serafini-Lamanna Lourdes Weltzien*



Section 1  
**Doing What Is Right**

## Why Do We Have A Code Of Ethics?

Meridian's Vision for Value Creation is based on four strategic pillars:

Account Focus

Customer Experience

Operational Efficiency

Innovative Solutions

While these four strategic pillars define "where" our business is going, our Code helps us determine "how" we will get there by creating standards for how we behave at Meridian.

By embracing a "doing what is right" mentality, we establish the most critical cornerstone value to support our business. We must follow all applicable laws, regulations, rules, policies, and procedures to do what is right. Beyond just following the law and regulations, we also must apply high ethical standards, behaving morally and with integrity in all our business transactions and interactions.

All of Meridian's employees and business partners are expected to comply with the Code. Additionally, we must speak up if we see or suspect an employee or business partner is not following the Code, and we should ask questions if we are unsure or if it isn't clear what we should do.

Any waiver of any provision of this Code must be approved by the General Counsel and Chief Compliance Officer in consultation with the Compliance Review Board and the Meridian Board of Directors.



## Strive To Be An Ethical Leader

Meridian's people managers are expected to be role models for ethical leadership. Ethical leaders do the right thing every day without compromising on our values. Ethical leaders do not ask their subordinates to compromise our values or violate our Code. Ethical leaders lead by example.

**If you are a people manager at Meridian, it is important that you create a culture that fosters an ethical commitment to integrity in our business, including by:**

- Being a role model and leading by example
- Encouraging employees to speak up if they have concerns or questions and ensuring those who do are not subject to retaliation
- Upholding the highest ethical standards
- Not compromising our ethics to achieve business results
- Rewarding and recognizing employees who demonstrate ethical behavior
- Ensuring concerns are promptly reported and investigated

## Speak Up

It takes a lot of courage to speak up. We believe in open and candid conversation, and we encourage everyone at Meridian to speak up by raising concerns, seeking guidance, and reporting actual or suspected violations of laws, our Code, our policies, and applicable industry requirements. We strive for a supportive atmosphere where everyone feels comfortable reporting concerns, whether they are current or former employees, business partners, suppliers, customers, or members of the public. We want to hear from you any time you have concerns or questions. We promise to take your concerns seriously and to investigate them promptly.

Employees can raise compliance-related questions and concerns to their manager, any other members of management, Human Resources, Meridian's SVP, General Counsel and Chief Compliance Officer, Meridian's Legal and Compliance Team, or our EthicsPoint helpline at [www.meridianbioscience.ethicspoint.com](http://www.meridianbioscience.ethicspoint.com).

With our EthicsPoint helpline, every person (internal or external) has free, unlimited access to report any issues, concerns, or violations of law or company policies in a confidential manner. The EthicsPoint helpline is available 24 hours a day, seven days a week, through a toll-free number (844.246.9963) or use the online address above.

The Company has developed procedures to evaluate and address all ethics-related concerns. While maintaining confidentiality is essential to this policy and our culture, there may be times when information reported will be shared with others as necessary to conduct a full and fair investigation.



## Zero Tolerance For Retaliation

Meridian wants all employees, business partners, and others to feel comfortable speaking up, asking questions, raising concerns, or seeking guidance without fear of retaliation. Meridian will not retaliate or allow others to retaliate against individuals who raise good faith reports of actual or suspected violations of Meridian's Code who cooperate in an internal ethics investigation.

Any Meridian employee who retaliates against a person for making a good faith report or participating in an internal investigation will be subject to disciplinary action, up to and including termination of employment.





Section 2  
**Act With Integrity**

# Conflicts Of Interest

Meridian's employees and business partners have an obligation to promote Meridian's best interests, and they must avoid situations that present potential or perceived conflicts of interest between their personal interests and Meridian's interests. It is essential that Meridian's employees and business partners avoid any undisclosed and unapproved financial or other business relationships with suppliers, customers or competitors that could be perceived to impair their reasonable judgment or create a conflict of interest with Meridian's interests. Conflicts of interest may also exist if any Meridian's employees or business partners, or any of their relatives, were to receive an improper payment or other personal benefit as a result of his or her position or association with Meridian.

When there is an actual or potential conflict of interest, Meridian's employees and business partners must promptly notify Meridian's Legal and Compliance Team to discuss the actual or potential conflict and to seek further guidance.

### Potential conflicts of interest include:

- Working for a competitor, customer or supplier or sharing confidential company information with them
- Failing to disclose your relationship with a job candidate
- Having a romantic personal relationship with a supervisor or subordinate
- Doing business with a company that employs or is owned by your relatives
- Accepting an inappropriate gift from a vendor or supplier
- Using Meridian property, information or resources for the personal benefit of yourself or others



# Misappropriation Of Corporate Opportunities

Another type of Conflict of Interest is the Misappropriation of Corporate Opportunities. This occurs when an employee takes an opportunity for their own personal benefit that was intended for Meridian or addressed to them in their capacity as a Meridian employee. An obvious example would be if a procurement employee took a supplier rebate check based on Meridian's purchases and deposited it in their personal account. Another example would be if someone called Meridian and offered to sell Meridian a piece of neighboring property, and the employee who received the call purchased it personally without first offering the property to Meridian. All of Meridian's employees and business partners must not take for themselves any business opportunities that are discovered through their position with Meridian or which are otherwise intended for Meridian.

# Confidentiality

One of Meridian's most valuable assets is its confidential business information. Meridian's employees and business partners must maintain the confidentiality of Meridian's non-public information, except when disclosure is authorized or legally required. Meridian's people managers must ensure that their subordinates, as appropriate, are aware of the importance of protecting confidential information.

**Confidential information is information that is not publicly available and includes:**

- research and development projects
- business plans and financial results
- customer lists
- trade secrets
- manufacturing formulas and processes
- supplier data
- pricing and pricing proposals
- marketing strategies
- other non-public information

# Protection And Proper Use Of Meridian Assets

**We are the caretakers of our company and our work.**

Meridian's employees and business partners have a responsibility to protect Meridian's assets from theft, loss or abuse, whether those assets are physical property, like inventory and computer equipment, or intellectual property, such as trade secrets and formulations. We must act with care and use good judgement to ensure that Meridian's assets are used for legitimate business purposes and are not lost, stolen, misused, or wasted.

## Artificial Intelligence (A.I.)

Employees must use AI tools and applications responsibly. AI prompts must not include any confidential, sensitive or proprietary Meridian or third-party customer, supplier or employee-related data. This will help protect the company from data protection breaches, intellectual property disputes, and the potential loss of confidential information.

Please refer to our A.I. Guidelines for more information.



# Protecting Personal Data

Meridian's customers, their patients, and our employees trust us with their personal data. We must ensure that any personal data in our possession or control is protected and only used for legitimate business purposes (and where consistent with applicable law). Meridian's policy is to comply with all applicable data privacy laws. Employees must handle all personal data with confidentiality and take all reasonable security measures to safeguard personal data from misuse.

# Insider Trading

Although Meridian is no longer a publicly traded company, we conduct business with many publicly traded customers and suppliers, and our ultimate parent company, SD Biosensor Inc. (SDB) is publicly traded in Korea. As a result, we are bound by applicable US and other laws that prohibit Meridian's employees and directors from trading in any securities while in possession of material, non-public information. Using material, non-public information to get financial benefit, often by buying or selling shares, is unfair, distorts markets, and erodes the trust of those who work with us. It's a serious violation that can carry significant penalties, including termination of employment, fines, and even imprisonment.

Section 3  
**In Our Workplace**

# Respect In The Workplace

Everyone wants to work in an inclusive, safe and supportive work environment. Respect for others is important for Meridian's success, as we all do our best work when we feel secure knowing our talents are respected.

Meridian has zero tolerance for disrespectful behavior in the workplace. If you or someone else is being subjected to disrespectful behavior in the workplace, you should speak up, so we can investigate and address any misconduct.

### Disrespectful behavior may include:

- Interrupting someone before they are done speaking
- Making rude, snide or belittling comments
- Making facial gestures or negative body language when someone is speaking
- Circulating rumors
- Refusing to include someone in an activity or communication

Employees who engage in this type of behavior may be disciplined, up to and including termination.

For more information regarding respect in the workplace, please see our Employee Handbook.



## Inclusion And Diversity

At Meridian, we serve our customers best when we understand and respect a broad range of ideas and opinions. We are committed to creating a culture of inclusion, diversity and equity that respects everyone as an authentic individual. We also try to recruit, hire and maintain talent from various backgrounds, and we actively search for different points of view. We listen to others with courtesy and respect and speak out when we feel our views or those of others are being disrespected.

For more information regarding our Inclusion, Diversity and Equity (IDE) program, please contact Meridian Bioscience Human Resources at [Human.Resources@meridianbioscience.com](mailto:Human.Resources@meridianbioscience.com).

# Discrimination And Harassment In The Workplace

Meridian is committed to providing equal employment opportunities to all employees regardless of their identity and any legally protected personal characteristics. This protection extends to all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, compensation, termination, and all other terms, conditions, and privileges of employment. Understanding and addressing different types of discrimination is crucial for cultivating an inclusive, supportive work environment and important to a successful business. We can all support an inclusive workplace by understanding the different forms of discrimination and speaking up when we see it happening.

Meridian also does not tolerate harassment in the workplace. Harassment is any unwelcome, hostile, and/or unwanted or threatening behavior or conduct that affects the dignity, rights or well-being of an individual employee, group of employees, our business partners based on a legally protected characteristic. These protected characteristics may include the person's age, race, color, national origin, sexual orientation, ancestry, religion, sex (including transgender and transitioning status), pregnancy (including childbirth, lactation, and related medical conditions), disability, genetic information, veteran status, military status, or any other status protected by applicable law.

Please see our Employee Handbook for more information.

# Maintaining Accurate Records And Record Retention

We must ensure that our Company's books and records are accurate and fairly represent the underlying transactions. The Company's "books and records" are expansive and include things like time sheets, orders, invoices, expense reports, quality and production documents, and accounting sheets.

No one should attempt to coerce, manipulate, mislead, or fraudulently influence anyone to alter or falsify any of the Company's books or records. In addition, all communications with internal or external auditors or regulators should be cooperative, open and honest.

## Do:

- Comply with and follow all generally accepted accounting principles
- Follow all internal controls, policies, and all applicable laws and regulations
- Maintain honest documents that do not contain misstatements, unsupported values, or embellishments
- Record all entries and business transactions accurately and timely
- Submit any requested records to auditors in a timely manner
- Tell management if there are inaccurate, false or misleading records or entries

## Don't:

- Use any payment methods that are secret or not recorded
- Misinform anyone about business operations or our finances
- Create falsified documents because of pressure (real or perceived) to complete a goal
- Agree to any terms or conditions outside the scope of our traditional business practices
- Hide or destroy any documents that should be retained
- Falsify or mislabel a document or entry to conceal the underlying transaction

Please also review the Corporate Travel and Expense Management Policy, Anti-Corruption Policy, and Employee Handbook.



## Social Media Policy

Social media has the potential to damage the reputation of our Company when not used thoughtfully. When we use social media, we must do so responsibly. Only authorized individuals may communicate publicly on behalf of Meridian. Employees using social media personally must never share Meridian's confidential information online or represent themselves as speaking on behalf of the Company or the Company's management team.

If you have any concerns about Meridian's online reputation or social media presence, please contact Meridian's Legal and Compliance Team. Please also review USE OF SOCIAL MEDIA in the Employee Handbook.

## Safety In The Workplace

Meridian is committed to providing a safe and healthy workplace that promotes a positive environment in which employees can feel more productive and where we comply with all applicable governmental laws and regulations. Our Employee Handbook has outlined specific behaviors that are acceptable and unacceptable in the workplace.

### Employees must always:

- Follow all safety and health procedures and company policies
- Report any unhealthy conditions, such as safety hazards or broken equipment
- Follow all required laws and regulations regarding health and safety
- Never take shortcuts or bypass safety procedures
- Never bring illegal drugs, or other controlled substances to work, or come to work under the influence of these substances
- Never bring weapons or firearms into a Meridian facility

Section 4  
**In The Marketplace**

## Compliance With Laws

Meridian's employees and business partners are expected to comply with all applicable local, state, federal, and international laws, including all applicable regulations, rules, orders or policies, including all applicable U.S. Food and Drug Administration (FDA) regulations.

The failure to comply with applicable law can lead to serious consequences, including legal penalties, reputational damage, and operational disruptions. It can also result in personal criminal liability and charges for the individuals who authorized or engaged in the violations. As a result, each Meridian employee plays an important role in ensuring that Meridian is aware of, and follows, all applicable laws. Failure to do so can result in discipline, up to and including termination of employment.

## Anti-Bribery And Corruption

We do not engage in bribery or other forms of corruption. Not only is this unethical, but it may also violate applicable anti-bribery and anti-corruption laws where we conduct business, which can result in lawsuits, substantial fines and penalties, and criminal prosecution.

As an employee, you should never accept or provide anything of value, directly or indirectly, in order to obtain an improper advantage or to retain or obtain business. You should always err on the side of caution, meaning you should avoid even the appearance of unlawful activity. This is especially true when dealing with governmental officials, political parties, and state-owned or state-controlled enterprises.

Please see our Anti-Corruption Policy for additional information.

# Anti-Money Laundering

We are committed to the prevention, detection, and reporting of money laundering and terrorist financing. Money laundering is the practice of funneling illegally obtained funds through legitimate businesses to hide their illegal origin. This is illegal and is not permitted.

To ensure we are not supporting such practices, be sure to only conduct business with individuals and organizations after completing appropriate due diligence. Furthermore, immediately report any suspicious or unusual transaction activities, such as:

- payments in cash
- checks from unidentified third-parties
- forms of payment that exclude identifying information
- requests to transfer funds to or from countries or entities that are not related to the transaction or the customer
- involvement with special financing institutions such as banks lacking a physical presence in any country, offshore banks, unlicensed money transmitters, and non-bank financial intermediaries



# Preventing Theft And Fraud

We do not tolerate theft or fraud in our business. Theft is taking something that does not belong to you without permission. It can include physically taking something, such as money or property, or it can be done through other means, such as forgery, embezzlement, or fraud. Fraud is a type of theft by deception.

We are all responsible for safeguarding Meridian's assets and reputation by watching for any kind of fraudulent activities involving the company, our employees, customers, business partners, or other interested parties.

## Fraud and theft may include the following:

- Inappropriate, unauthorized, or personal use of Meridian's corporate credit cards (including travel cards and purchasing cards)
- Embezzlement or other financial irregularities
- Forgery, alteration, or falsification of documents (including checks, time sheets, travel expense reports, contract agreements, purchase orders, other financial documents or financial records, or electronic files)
- Misappropriation, misuse, theft, removal, or destruction of Meridian's assets and/or resources, including funds, supplies, inventory, furniture, fixtures, equipment, intellectual property, or any other asset
- Improprieties in the handling or reporting of money or financial transactions
- Personal use of Meridian's property or misuse of Meridian's facilities (including telephones, computers, and e-mail system)
- False claims by employees, business partners, or others associated with Meridian

We are committed to the prevention, detection, and reporting of any fraudulent or deceptive activities.

Concerns regarding any suspicious activity should be raised immediately.

# Gifts And Entertainment

Gifts and entertainment have their place in a business environment, but they must be approached with caution to avoid creating real or perceived conflicts of interest, bribery, or corruption.

- **Offering Gifts or Entertainment**

Attempting to influence customer purchasing decisions by providing personal gifts, offers of entertainment, travel, discounts or special favors is improper, unacceptable, and in some instances unlawful, and is prohibited. For that reason, do not offer money, gifts, or other items of value to customers or prospective customers that may be construed as an attempt to improperly influence their relationship to our Company's business interests. This is especially true with any gifts offered to any governmental employees or officials.

- **Accepting Gifts or Entertainment**

Business gifts of significant value offered to you may be intended to improperly influence the selection of vendors or suppliers, and must be reviewed and approved consistent with our policies.

Generally, business gifts (whether given or received) may be appropriate when they are of nominal value and include no cash or cash equivalents (such as gift cards). For more information, please seek guidance from the Legal and Compliance team before accepting or providing any gifts or entertainment.

# Dealing Ethically With HCPs, HCOs And Government Officials

Meridian believes that strong, long-term relationships with healthcare professionals (HCPs), healthcare organizations (HCOs), and government officials (GOs) help us better understand our customers and their patients' needs. Through collaboration, we continue to develop high-quality products and teach people about their safe and effective use.

Laws and industry rules set high standards that govern our interactions with HCPs, HCOs, and GOs. These relationships must always be grounded in a legitimate business need and never be used to secure an improper business advantage. If we can not develop these types of relationships, build trust, and sustain them over time, our reputation will be damaged, and our business may suffer. If we make mistakes, the consequences may be severe.

## Collaborating ethically with healthcare professionals

### Do:

- Engage with HCPs only if we have a legitimate need
- Select locations and venues to interact that are modest and appropriate
- Pay HCPs fair market value for their services
- Choose only qualified HCPs to meet our legitimate needs
- Always follow our policies for guidelines regarding HCP meals and modest travel expenses
- Make sure clinical studies and research meet the highest ethical, medical, and scientific standards and initiatives

### Don't:

- Work with an HCP without a proper written agreement or contract
- Attempt to interfere with an HCP's independent medical judgment
- Make arrangements (including grants, donations, or contributions) that are intended to reward or encourage an HCP to purchase, lease or recommend our products

# Ethically Engaging Third Parties

Our third-party partners are important to our success and our business plans. Third-party partners may include sales agents, distributors, vendors, service providers or consultants. We select our third-party partners with care. We want them to meet our standards of ethics and our standards of quality because their conduct reflects on our reputation in the industry. There are many laws and regulations that apply to our business, and we could be held liable for third parties acting on our behalf.

## Do:

- Make honest and fair deals
- Use a fair selection process based on qualifications and legitimate business needs
- Avoid conflicts of interest and disclose any personal relationships with a third party
- Protect confidential information
- Speak up if a third party is in breach of our Code or other policies
- Share our expectations with our business partners regarding our ethics policy
- Monitor third parties when we are in a business relationship

## Don't:

- Ask or allow a third party to violate our Code, policies or laws
- Accept kickbacks, bribes, or extravagant gifts against our gifts policy
- Work with any third party that has not been vetted and approved with our internal procedure for third parties
- Establish side agreements that are not in line with our policies

## Trade Controls

Meridian operates in locations all over the world, and we are subject to various laws and trade restrictions regarding the import, export, and re-export of our products and raw materials. It is important that we comply with all applicable trade control laws. Following these laws helps maintain our reputation for fairness, honesty, and integrity. If we don't follow these laws, we can be subject to civil and criminal penalties that may include suspension or denial of international trade privileges.

### Sanctioned Countries

Sanctioned Countries are countries designated by the governments of the U.S., E.U. or other applicable governing bodies as having limited or comprehensive trade sanctions and embargoes placed against them for reasons of anti-terrorism, non-proliferation, narcotics trafficking, or other reasons. Such sanctions are intended to deter bad behavior through economic penalties. We must comply with all applicable international trade sanctions and not conduct business with sanctioned countries or entities. In some cases, there may be exceptions or licenses that would permit us to conduct business with sanctioned parties or countries. When you are unsure, please discuss any potential opportunities with Meridian's Legal and Compliance Team for guidance.



## Do:

- Know the import regulations related to marking and labeling of goods, valuation of goods, payment of duties, and record keeping for our products, services, and technology
- Know the requirements for export and re-export. An export can include physically or electronically sending a product or technology across an international border. An export can also be providing a service to someone in another country, or just sharing information with a foreign national. Re-export involves the shipment or movement of U.S. originated product or technology from one non-U.S. territory to another
- Know your customer and their intended use of our products
- Conduct risk assessments and due diligence checks on third parties with whom you intend to conduct business
- Make a report to management or our [EthicsPoint helpline](#) if a customer, supplier, or anyone else asks us to participate in a prohibited boycott

## Don't:

- Allow products to be sent to a different destination than originally planned unless such an arrangement is permitted under our policies
- Don't conceal any elements of a transaction or falsely complete any import/export or other trade related form or filing
- Don't carry out any task or forward on any task that you believe is prohibited due to applicable sanctions and/or export controls

# Fair Dealing And Fair Competition

Meridian's relationships with its customers, suppliers, competitors and employees are based on fair and honest business practices. We will succeed as a business because we have ideas and technology that meet the needs of both customers and patients. We also follow all applicable laws, including antitrust laws, that govern how companies compete and conduct business with each other. These laws promote a competitive marketplace and prohibit conduct seeking to reduce or restrain competition, while protecting consumers from unfair business practices.

No Meridian employee or business partner should take unfair advantage of our customers or suppliers through behaviors that restrict competition or create an unfair competitive advantage. Examples of prohibited conduct include price fixing, monopolistic practices, bid rigging, collusion, manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair trade practice.

## Do:

- Stay clear of any false or dishonest practices
- Seek legal guidance regarding best practices before interacting with competitors
- Use publicly available information when possible
- Follow any confidentiality or nondisclosure agreements when dealing with sensitive information
- Respect our competitor's rights regarding their intellectual property

## Don't:

- Discuss contract terms, sales strategies or any pricing with competitors
- Make any agreements with competitors that divide or allocate markets, territories or customers
- Use our position in an unethical manner to reduce, prevent or eliminate competition
- Ask for sensitive or confidential business information from competitors or their customers
- Use illegal methods, such as theft, to get improper information regarding competitors

# Product Promotion

Meridian is proud of our contributions to the healthcare industry and to society's needs for healthcare sciences and devices. Our products provide services and solutions for many healthcare providers and their patients. We believe in our products and have confidence that our products will perform as intended based on our quality standards.

Customer relationships are built on trust and supported by integrity. We want our customers to have a clear understanding of our products and technologies, and we never want to mislead them. All promotional material must be honest and truthful, and never deceptive or inconsistent with the approved labeling (i.e., "off-label"). Following ethical principles for advertising will maintain a good and honest reputation with our customers.

## Do:

- Promote only products authorized for sale in that territory
- Make sure regulatory labeling requirements are met
- Ensure all advertising and marketing materials meet the prescribed requirements
- Make accurate and truthful claims about our products, supported by objective data

## Don't:

- Promote any products before they are approved for a given market
- Suggest or encourage unsanctioned off-label uses
- Embellish the benefits of our products or omit potential risks
- Provide falsified clinical data or unsupported product testing results
- Make untruthful criticisms about competitors
- Make changes to approved advertisement or promotional materials or create your own marketing material or labels

## Product Safety

Meridian is committed to the development, manufacture, and supply of safe and high-quality products. We must follow stringent safety and quality control standards and monitor our products to ensure they function as designed. Employees have an obligation to follow our Company's quality management systems and to comply with all applicable policies, procedures, and legal requirements in the manufacturing and testing of our products.

Employees must promptly report any safety, quality, or performance issues through one of our reporting procedures.

**NEVER CUT CORNERS.** Never bypass or shortcut any quality or safety controls that will compromise the product.

### Do:

- Make sure all products are developed and manufactured using the appropriate procedures
- Make sure all information we keep or send to government agencies is truthful, accurate and complete
- Properly label, advertise and promote our products
- Promptly report complaints and other signs of potential product issues

### Don't:

- Assume the rules in your home country are the same in other countries
- Assume someone else will speak up; if you learn of a problem or have concerns, speak up so we can address the issue
- Hide or withhold information that could negatively impact our compliance with safety and quality standards

Section 5  
**Global Responsibility**



## Respecting Human Rights

At Meridian, we respect and protect human rights in all aspects of our business, whether it relates to our workforce, our sales and procurement practices, third-party agents or interactions with other business partners. We acknowledge that all people should be treated with dignity and respect, and we expect all employees and business partners to do the same.

### Anti-Slavery and Human Trafficking

Meridian is committed to maintaining best practices to combat modern slavery and human trafficking. We do not knowingly associate or conduct business with any individual or company that participates in any of the following: exploitation of children or child labor, physical punishment, forced or compulsory labor (slavery), unlawful discrimination, unlawful occupation, and human trafficking.

## Sustainability

Meridian believes in accountability and environmental responsibility. We understand that a healthy global environment is directly impactful on human health. Increasing regulatory and customer requirements related to sustainability have driven us to prioritize doing what is right to protect the environment.

### Protecting the Environment

We must comply with all applicable environmental laws, rules, and regulations, including, without limitation, those pertaining to the proper storage, handling, and disposal of materials and wastes. Our commitment to protecting the environment extends beyond compliance with applicable law through our efforts to reduce pollution, conserve water and energy, support sustainable business practices and develop products that help our customers do the same.

### Sustainable Procurement

As a purchaser of raw materials and other goods and services, Meridian takes its commitment to sustainability seriously. We include sustainability assessments of our suppliers and their products in our selection process and we ask that they in turn monitor and improve their sustainability and that of their supply chain. For more information, please visit Meridian's Sustainability webpage at [www.meridianbioscience.com/sustainability](http://www.meridianbioscience.com/sustainability).

# Purchasing Practices: Conflict Minerals

Meridian sources its supplies and services based on quality, price, value and sustainability. We treat our business partners fairly, openly and honestly. In our efforts to support our international community, Meridian follows the applicable laws and regulations governing the procurement of conflict minerals. We engage in a reasonable due diligence process with our suppliers regarding the origin, source and chain of custody of conflict minerals and/or other regulated raw materials.

Meridian will not knowingly provide any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. Similarly, Meridian has an Anti-Corruption Policy that prohibits employees from engaging in corruption and bribery. We expect the parties in our supply chain to follow the same ethics and principles and avoid conflict affected and high-risk areas.

## Lobbying And Political Activity

As a corporate citizen, Meridian may take positions on issues of public policy that may impact our business or our customers. Meridian may also engage in efforts to affect legislation or government policy. Because regulations vary around the globe, only certain individuals within Meridian are authorized to engage persons to lobby on our behalf.

You must not contact a government official to influence legislation or government policy on behalf of Meridian or engage third parties to lobby on behalf of Meridian without first receiving advance approval from the General Counsel and Chief Compliance Officer.

Meridian recognizes your right to participate in the political process as an individual; however, you may only participate in political activity during your own time (outside of work) and at your own expense. You must not use Meridian time, funds, facilities, communication tools, or assets for personal political purposes.

# Charitable Contributions And Sponsorships

Supporting the communities where we live and work is important. Meridian may make contributions, grants, and/or donations to charitable, educational, or research organizations that are consistent with our beliefs and values. We will also explore volunteer opportunities that will help us better understand and engage with our communities.

Please note, however, that Meridian employees may not contribute, donate or give grants to third parties (even charities), with the purpose of persuading someone to buy, recommend or prescribe our products. Doing so may create a conflict of interest and/or violate our Anti-Corruption Policy.





# Conclusion

Our ultimate commitment in this Code is to be fair, honest, and ethical in our business practices and behavior at work. This commitment extends beyond just compliance with applicable law and includes compliance with this Code and our policies and procedures. We all have a responsibility to maintain our values by acting with integrity and to make ethical decisions.

We encourage and expect all employees to speak up and report any suspected violations of laws, the Code, our policies, or other relevant industry procedures. As noted above, if you ever have any concerns or questions about the Code or a Meridian business practice, please contact a member of Human Resources, Meridian's Legal and Compliance Team, or utilize our EthicsPoint helpline at [www.meridianbioscience.ethicspoint.com](http://www.meridianbioscience.ethicspoint.com) or call +1 844-246-9963.



