

Embecta Corp. Code of Conduct

Effective April 1, 2022

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Message from our President and CEO

We may be a new company, but there's nothing new about the high level of integrity we bring to every interaction and every relationship, whether it's with our customers, business partners, community or colleagues. This is the foundation of our Code of Conduct, which provides direction on how we must behave in any scenario, and it applies to everyone at embecta equally.

Our mission is to develop and provide solutions that make life better for people living with diabetes, and we touch 30 million of them every single day. We have a direct impact on their wellbeing; that is a rare and intimate responsibility that we should never take lightly.

Nothing is more essential to our mission than acting with integrity and holding ourselves—and each other—accountable. By familiarizing yourself with this Code of Conduct, you'll be taking an important step in helping us advance every day together, and doing it the right way.

—Dev Kurdikar,
President and CEO

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Our Mission, Vision and Values

Mission

To develop and provide solutions that make life better for people living with diabetes.

Vision

A life unlimited by diabetes.

Values

- **Integrity:** We act with utmost integrity and hold ourselves accountable to our commitments.
- **External focus:** We continually seek to understand the needs of people with diabetes, customers, regulators, and other stakeholders to deliver on their expectations.
- **Results oriented:** We measure ourselves by results and we relentlessly strive for breakthrough performance and consistent execution
- **Hungry mindset:** We act with urgency and persist in the face of adversity while continually seeking to improve in everything we do.
- **Innovative:** We create value through enhancements to products, services, and processes.
- **Team players:** We believe in constructively challenging each other and holding each other accountable to achieve the organization's commitments.
- **Authentic & inclusive:** We all have value to offer and we want everyone's authentic self at work. The diversity of our teams makes us better at identifying opportunities and solving problems.

Our Code of Conduct

Introduction

This Code of Conduct (the "Code") sets the foundation for how we conduct business at Embecta Corp. ("embecta") consistent with our values. To the extent our Code requires a higher standard than required by applicable laws, rules or regulations, embecta adheres to these higher standards. Our Code provides guidance to help us follow through on these ethical standards and protect our reputation.

Speaking up

Ask questions. Raise concerns. Seek guidance.

We encourage and expect everyone at embecta to speak up by asking questions, raising concerns, seeking guidance, and reporting actual or suspected violations of laws, our Code of Conduct, our policies, relevant industry codes, or our high ethical standards. This expectation extends to all associates, vendors, and other third parties working on our behalf.

It's critical that we speak up when we see something that conflicts with our values or our Code. Speaking up helps all of us protect the company's reputation and makes embecta a better place to work. If there is a mistake, we're transparent about it, and we do what we can to make it right, to the best of our ability.

embecta associates are encouraged to have open communications with their manager(s), local and HR partners. This lets all of us raise issues, ask questions, and constructively challenge others to be better and advance health in the process. If you're worried about raising an issue locally, you can always contact Ethics and Compliance directly, and depending on local laws, you can often do that without sharing your name.

You may ask questions, raise concerns, or seek guidance in a number of ways, such as:

- Using the online reporting tool for the Ethics Helpline at: embecta.ethicspoint.com
- Calling the Ethics Helpline: China (400 120 1951), France (0-800-99-0011), Ireland (180 085 1325), or the United States (1-833-600-1032)
- Emailing Ethics & Compliance: compliance@embecta.com
- Talking to your manager or a neutral and uninvolved manager if you'd prefer
- Contacting a representative in Ethics & Compliance, Human Resources, Legal, or Internal Audit

Ethics Helpline

An independent company operates the Ethics Helpline.

We encourage you to report issues face-to-face or by phone. You may remain anonymous if you choose, **except in the rare cases when local law prohibits it**. Keep in mind that it may be more difficult to investigate and address your concerns if you remain anonymous.

Zero tolerance for retaliation

embecta does not tolerate any form of retaliation. This applies to anyone who reports an actual or suspected violation of embecta policy or cooperates in embecta investigations. embecta wants all associates to feel comfortable asking questions, raising concerns, or seeking guidance without fear of retaliation.

Any embecta associate who engages in retaliation will be subject to disciplinary action, up to and including termination of employment. If you believe someone has retaliated against you, contact Human Resources or Ethics & Compliance.

Reporting concerns

embecta takes all reports of violations of laws, embecta policies, and our high ethical standards seriously. We encourage and expect all employees to speak up and report actual or suspected violations of laws, the Code of Conduct, embecta policies or relevant industry codes.

Everyone at embecta must cooperate fully with any embecta investigation or audit. This includes answering questions truthfully, sharing all relevant information, and protecting potential evidence. Anyone accused of wrongdoing will get fair and objective treatment.

Confidentiality is a top priority for embecta. We take care to keep your identity confidential. This may not always be possible though due to the nature of the issue, the need to conduct a more thorough investigation, or legal requirements.

embecta will take appropriate corrective action for any misconduct. Violations may result in disciplinary action, up to and including termination of employment. Serious violations could also result in legal liabilities for the company and/or the involved individuals.

Being an ethical leader

Each of us must be an ethical leader. This means we do the right thing, every time—even when it is not easy and even when no one is looking. It also means we don't compromise our values or ask anyone else to do so.

If you are an embecta leader or manage people, you have a special duty to foster a culture of ethics and integrity by:

- Serving as a role model and leading by example in all you say and do
- Encouraging your team to speak up when they have concerns, listening to those concerns, and handling them appropriately
- Ensuring your team has the knowledge and resources to perform their jobs in an ethical manner
- Talking to your team regularly about the Code and what ethical and compliant behavior means for them
- Making it clear that we never compromise our ethics to achieve business results
- Never retaliating or allowing retaliation against any associate who reports an issue or raises a concern
- Recognizing and rewarding ethical behavior, addressing and correcting inappropriate behavior, and doing so consistently
- Considering ethical character and behavior when making decisions about hiring, promoting, and evaluating associates
- Taking action to prevent or stop violations of the Code or the law, and ensuring issues are properly reported and addressed

Applying our Code

Our expectations

Everyone at embecta, from directors to officers and associates, must follow our Code of Conduct. It applies equally to everyone, no matter their position or level. This is a condition of employment at embecta.

Note: Nothing in this Code creates or implies a promise or contract of employment.

Our responsibilities

At work, we must always make choices in line with our values and the Code. Among other things, this means:

- Never compromising our values to achieve our objectives
- Learning and following our Code, policies, and procedures, and all laws and regulations that apply to our job
- Speaking up when we see or suspect someone isn't following the Code, and asking for help when it's not clear what we should do

In short, we must always: *ask questions, raise concerns, and seek guidance.*

Waivers

Waivers of any provision of the Code are rare and may be granted only by Ethics & Compliance, in consultation with the General Counsel. Waivers for executive officers or directors may only be granted by the Board of Directors.

Our people

The health and well-being of people is at the core of everything we do. That’s why it’s so important for us to treat each other fairly and maintain a safe and healthy workplace.

Fostering a respectful workplace

What we believe

Everyone deserves to work in a supportive, inclusive, and safe environment. We treat everyone with dignity and respect.

Why it matters

Respecting others is an important factor for our success. We do our best work when we feel safe and secure, knowing that our ideas and talents will be recognized and respected. That’s why we never tolerate discrimination, harassment, retaliation, bullying, or violent conduct at work.

Do: <ul style="list-style-type: none">• Treat one another with dignity and respect• Speak up if you see anyone being harassed or threatened in any way	Don't: <ul style="list-style-type: none">• Say or do anything that others may find offensive or degrading
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Supporting inclusion and diversity

We serve our customers best when we seek out and listen to a broad range of ideas and opinions by:

- Recruiting, hiring, and retaining the best talent from a wide range of backgrounds
- Actively searching for different points of view
- Listening to the points of view of others with courtesy and respect
- Speaking out when we feel our views or those of others are being disrespected

Preventing discrimination

We will not be successful if we limit others. Instead, we do what’s right by:

- Treating others fairly and focusing on the skills and experience they bring to embecta
- Using only merit and performance for decisions about hiring, training, discipline, and promotion
- Never discriminating against anyone on the basis of “protected characteristics.” These include:
 - Race
 - Color
 - Gender (including pregnancy, childbirth, lactation, and related medical conditions)
 - Age

- National origin
- Ancestry
- Pregnancy
- Physical or mental disability
- Medical condition
- Religious beliefs
- Sexual orientation
- Genetic information
- Gender identity
- Gender expression
- Marital status
- Citizenship
- Military or veteran status
- Social class
- Any other characteristic protected under applicable law

- Accommodating individuals with legally recognized disabilities and/or religious beliefs

Preventing harassment

We don't tolerate harassment. Harassment is any unwelcome verbal or physical conduct based on a "protected characteristic." It may also include conduct of a sexual nature. Harassment may create an intimidating, hostile, or offensive work environment.

Here are some examples of sexual harassment:

- Inappropriate physical contact
- Sexually suggestive comments
- Offensive language or images passed along by any means, including the internet, email, voicemail, text, or instant message
- Unwanted advances or offers
- Asking for sexual favors or offering employment benefits in exchange for them
- Making derogatory comments or sexually explicit jokes
- Making comments about someone's body
- Using degrading words to describe someone
- Suggestive or obscene letters, notes, or invitations
- Any sexually suggestive behavior, such as leering, making gestures, or displaying sexually oriented objects or pictures

Upholding labor and employment laws

What we believe

We respect everyone, and that starts here in our business. We think that following the laws when it comes to labor and employment issues is not only the right thing to do, but it will also help our business grow. So, we follow all labor and employment laws to protect our associates and our business.

Why it matters

We show respect for our people by creating a safe and fair place to work. When people get fair and respectful treatment, they will have more motivation, do better work, and gain more satisfaction from their work.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Provide working conditions, hours, and compensation that are safe and fair • Report any concerns about hours and compensation to <u>Human Resources</u> • Choose suppliers who are committed to fair labor and sustainable sourcing 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • Allow child labor or forced labor by embecta or our suppliers
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practices that protect the health and well-being of workers and communities	
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Keeping workplaces safe and healthy

What we believe

Everyone deserves to be safe and healthy in the workplace. It’s important to make sure our operations meet or exceed applicable health and safety laws.

Why it matters

Our number one priority is making sure that our associates and all those who visit us are safe. We also know that a healthy work environment is a positive, enriching, and productive one. We make sure our workspaces are free from hazards and allow us to thrive. We use environmental, health, and safety management systems to achieve this.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Follow our health and safety policies and procedures • Report unhealthy or unsafe conditions or behaviors. This includes things like workplace hazards, broken or missing equipment, or the presence of weapons on embecta property. Contact law enforcement in case of immediate danger. • Know what to do in case of injury or other workplace emergencies. You can do that by cooperating during emergency drills. • Try to talk through disagreements calmly before they escalate • Report any threats of violence directed at you or anyone else. That includes anything, even if it’s outside work or on social media. Contact law enforcement in case of imminent danger. • Travel with reputable airlines and use embecta preferred hotels. Follow travel guidance and alerts issued by the company. 	<p><i>Don’t:</i></p> <ul style="list-style-type: none"> • Take unnecessary risks in the workplace or tell anyone else to do so • Take shortcuts or bypass health and safety policies and procedures— if you are pressed to cut corners, report it • Bring alcohol, illegal drugs, or other controlled substances onto embecta property or be under their influence while at work • Smoke or vape on embecta property • Bring weapons or firearms to work. That includes job sites and other work-related locations.
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Our customers and marketplace

We commit to our customers and their patients to always behaving ethically in everything we do. We follow all laws and regulations that apply to us when we do business, wherever in the world that may be. We consistently provide superior products and solutions that are safe and effective for our customers and patients. We are fair and honest in all our business dealings.

Playing fair

What we believe

We will succeed as a business because we have ideas and technology that meet the needs of customers and patients. We are fair and honest when we do business. We follow all the laws that govern how companies compete and behave with each other.

Why it matters

Fair competition laws, such as antitrust laws, promote healthy competition and protect consumers from unfair business practices. We will win in the marketplace based on the value of our products and solutions.

<p><i>Do:</i></p> <ul style="list-style-type: none">• Avoid any false or dishonest practices• Seek help from <u>Legal</u> if we want to compare our situation with a competitor or are unsure about how to act with competitors	<p><i>Don't:</i></p> <ul style="list-style-type: none">• Discuss pricing, contract terms, or marketing/sales strategies with competitors• Agree with competitors to divide markets, territories, or customers• Use our category position in an illegal or unethical manner to reduce, prevent, or eliminate competition• Make agreements with customers or sales channels like distributors to restrict resale prices• Make false claims or disparaging comments about our competitors' products or intentionally interfere with their business relationships
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Competitive intelligence

To compete effectively, we must understand our evolving industry and our competitors. However, we must gather and use information about our competitors responsibly and ethically. We should treat other companies and their information as we would want them to treat us.

<p><i>Do:</i></p> <ul style="list-style-type: none">• Use publicly available sources whenever possible• Follow any confidentiality or nondisclosure agreements when we can see another company's information	<p><i>Don't:</i></p> <ul style="list-style-type: none">• Ask for sensitive or confidential business information from competitors or their customers• Use illegal methods such as trespassing or theft to get information about other companies
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<ul style="list-style-type: none"> • Respect our competitors’ rights regarding their intellectual property and confidential information 	<ul style="list-style-type: none"> • Hire or talk to former employees of competitors to get confidential information
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Dealing ethically with HCPs, HCOs, and government officials

What we believe

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. These relationships must be based on the highest ethical standards.

Why it matters

Law and industry codes around the globe 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’t develop these types of relationships, build trust, and sustain them over time, our reputation will be damaged and our business will suffer. If we make mistakes, the consequences are severe.

Fighting bribery and corruption

We don’t accept, offer, or approve bribes of any kind. A bribe or “kickback” is anything of value meant to gain an improper business advantage. It also applies if we attempt to get favorable treatment from a government official. It’s critical that we avoid even the appearance of trying to bribe someone.

We follow anticorruption laws in many countries, including:

- U.S. Foreign Corrupt Practices Act
- U.S. Anti-Kickback Statute
- U.K. Bribery Act
- China Anti-Unfair Competition Law

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Know how to recognize and avoid a bribe • Be aware of how our actions might appear to others • Record all payments and expenses accurately • Speak up if you see or suspect bribery • Seek advice from <u>Ethics & Compliance</u> 	<p><i>Don’t:</i></p> <ul style="list-style-type: none"> • Use a third party or someone else to make illegal payments or sidestep embecta policies • Make any payment meant to “facilitate” routine services from a government official, unless it’s to protect your personal safety
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We never offer, give, or accept anything of value* to improperly influence decisions or to get an unfair advantage. These might include:

- Cash or cash equivalents
- Gifts
- Entertainment, hospitality, or meals
- Travel expenses
- Services

- Offers of a job or educational opportunities
- Loans or cash advances
- Grants, donations, or contributions
- Free of charge products
- Any other transfer of value, including favors for family members, even when it's a small amount

*Some items of value may be provided in limited situations for legitimate reasons. For example, we can pay for travel expenses and provide free of charge equipment in some cases. Consult [Ethics & Compliance](#) for guidance.

Free of charge products

We can give products to customers in certain situations. This applies, for example, when we want to demonstrate the product or let a potential customer evaluate if a product fits their needs. Provide only the minimum amount of product needed for the minimum amount of time required. Make sure documentation accompanies any free of charge product/trial use product. Keep track of any free of charge product, and act quickly to get products returned once customers have reached the end of the agreed trial use period.

Collaborating ethically with healthcare professionals

We can and should collaborate with HCPs for many reasons. These include:

- Product development and improvement
- Clinical studies or research
- Speaking engagements
- Training and education on the safe and effective use of embecta products
- Advisory panel meetings
- Scientific meetings
- Consulting arrangements
- Other legitimate services

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Engage with HCPs only if we have a legitimate need • Choose only qualified HCPs to meet our legitimate needs • Select locations and venues to interact that are modest and appropriate • Pay HCPs fair market value for their services in accordance with our policies • Make sure clinical studies and research meet the highest ethical, medical, and scientific standards. Medical Affairs must always be involved in clinical study and research initiatives. 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • Work with an HCP without a proper written agreement • Attempt to interfere with an HCP's independent medical judgment • Make arrangements (including grants, donations, or contributions) intended to reward or encourage an HCP to purchase, lease, or recommend our products
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Items provided to HCPs, HCOs, and GOs

Giving or accepting gifts or other items can create the perception of a conflict of interest or exposure under antibribery and corruption laws. That’s because it could seem as though we’re giving the item to get favorable treatment. Important and specific rules apply to gifts, entertainment, educational items, and other business courtesies to HCPs, HCOs, and GOs.

<p>Do:</p> <ul style="list-style-type: none">• Provide items to HCPs that benefit patients or serve a genuine educational function. Before offering any item to HCPs, HCOs, or GOs, make sure that the item is allowed under embecta policies, applicable laws, and industry codes. Many countries have specific requirements restricting items that may be given to HCPs.	<p>Don’t:</p> <ul style="list-style-type: none">• Give gifts of any kind, such as cookies, wine, flowers, chocolates, holiday gifts, gift baskets or gift certificates, and cash or cash equivalents, even for significant life events, like weddings, births, anniversaries, or funerals. However, outside the United States, you may provide a modest gift for the death of an HCP or their family member.• Pay for or facilitate entertainment, personal travel, or recreation of any kind for HCPs or GOs
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Transparency laws

Laws and industry codes in many countries require that we report HCP and HCO payments (or certain other transfers of value) to government organizations and/or the public (for example, the U.S. “Sunshine Act”). To do this, we must keep accurate records of all payments.

Following product rules

What we believe

When we follow the rules for our products, we help ensure they are safe and effective. This will build and maintain trust with our customers, their patients, and government agencies.

Why it matters

Our reputation and ability to sell our products depends on following the rules and regulations in each country where we operate. Our Regulatory Affairs, Quality Management, and Medical Affairs functions all play critical roles in helping us do that.

We follow the rules of government agencies, health ministries, and regulatory authorities around the world. A few examples of these organizations are listed below:

- FDA (U.S.)
- Therapeutic Goods Administration (Australia)
- Health Canada (Canada)
- Ministry of Food and Drug Safety (South Korea)
- National Medical Products Administration (China)
- National Health Surveillance Agency (Brazil)
- Medicines & Healthcare Products Regulatory Agency (U.K.)

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Make sure all products are developed using the appropriate controls and that they pass all appropriate testing before we market and sell them • Make sure all information we keep or send to government agencies is truthful, accurate, and complete • Only sell products that are authorized and meet all applicable regulatory requirements • Properly label, advertise, and promote our products • Promptly report complaints, adverse events, and other signs of potential product problems 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • 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 it can be addressed • Suppress information that could impact compliance with safety and quality standards
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Scientific exchange

What we believe

Making sure our products are safe and effective is a top priority. We can't promote or advertise any off-label use of our products. But there are important public policy reasons for our Medical Affairs associates to engage in scientific discussions with the external healthcare community related to both on- and off-label uses of our products.

Why it matters

We want to be a trusted and valued scientific partner in developing products that help improve patient care. We also want to help healthcare providers do their jobs more efficiently. Scientific exchange helps us do that, but there are strict requirements. Our scientific exchange principles also make sure we follow applicable legal requirements and that we protect our credibility and our stakeholders' trust.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Separate all scientific exchange activities from commercial and sales activities • Make sure all scientific exchange communications are non-promotional, balanced, objective, scientifically rigorous, and conducted by appropriately trained Medical Affairs associates • Support independent continuing medical education programs in accordance with our policies • Make sure clinical trials are conducted ethically and follow embecta policies, all applicable laws, and regulatory requirements 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • Take part in any scientific exchange activity if you work in sales, marketing, or any other commercial function • Share scientific information that is not balanced with accurate risks and benefits (such as focusing on positive data only) • Engage in proactive conversations about off-label use or solicit requests for off-label information • Suggest an investigational product or use is safe or effective
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<ul style="list-style-type: none"> Respond to unsolicited requests for information about off-label use by first stating that the topic is off-label, and embecta recommends use of its products in accordance with the approved labeling. Then refer the person making the request to your local Medical Affairs contact 	
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Ensuring product safety and quality

What we believe

The safety of patients and users of our products is a top priority. We think about the patient and healthcare professional during every step of development and production. We all need to make sure that embecta products and technologies meet appropriate safety and quality standards.

Why it matters

To help in successful diagnosis and treatment, embecta products must be safe and effective for their intended use. Our customers and patients are at the heart of everything we do, and they depend on the quality and safety of our products. We never cut corners.

<p><i>Do:</i></p> <ul style="list-style-type: none"> Follow quality system regulations, standards, policies and procedures, and good manufacturing practices Make sure our products are produced in an environment that promotes quality and consumer safety Take personal responsibility for the success of our business by immediately reporting any quality or safety concern 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> Bypass quality controls or take shortcuts that compromise the quality or safety of our products
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Promoting products honestly

What we believe

We're honest, open, and proud when we share the benefits of embecta products and solutions with customers and patients. We build trust and confidence in our products and technologies by promoting products honestly and supporting our claims with evidence.

Why it matters

Long-lasting customer relationships and our good reputation depend on trust supported by integrity. So we're honest and open about our products and technologies, and we never mislead our customers. Product advertising and promotion are also subject to strict legal requirements, including that all advertising and promotional claims must be on-label, truthful, not misleading, and not unfair or deceptive.

<p>Do:</p> <ul style="list-style-type: none"> • Promote only products authorized for sale in your country • Make sure our labeling, advertising, and promotional materials meet all applicable requirements as set forth in embecta policies • Use only advertising and promotional material that has been properly approved in accordance with embecta policies • Make accurate, truthful, and balanced claims about our products backed up by appropriate product testing or clinical data • Share information about reimbursement and health economics for our products that is honest and does not interfere with independent medical decisions 	<p>Don't:</p> <ul style="list-style-type: none"> • Promote products before getting approval to market them • Suggest or encourage any unapproved or off-label uses of products • Exaggerate the benefits of our products and technologies or hide the potential risks of using them • Make claims that are not supported by appropriate product testing or clinical data • Make false or disparaging claims about competitors • Make any changes to approved advertising or promotional material or create your own
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embecta associates may not change approved materials or create their own promotional materials.

Dealing ethically with third parties

What we believe

Our third-party partners are vital for our success, so we choose them carefully. At embecta, a third party might include our distributors, service providers, or consultants, to name a few. We treat them with respect and expect them to meet our ethical standards. They must share our commitment to ethics and quality. They must also provide the best value for embecta.

Why it matters

We work hard to build our reputation and earn the trust of our customers. It's important that partners working on our behalf help us protect that reputation and trust. That's because under the many laws that apply to us, we can be held responsible for anyone acting on our behalf.

<p>Do:</p> <ul style="list-style-type: none"> • Deal fairly and honestly with all third parties • Choose third parties based on a legitimate business need and their qualifications to meet that need, not for improper purposes. Use an open and fair selection process. • Let business partners know that we expect them to follow our values and applicable policies. • Avoid any possible conflicts of interest when choosing or dealing 	<p>Don't:</p> <ul style="list-style-type: none"> • Ask or let a third party do anything that violates our Code, policies, or the law • Accept or offer bribes or kickbacks • Work with a third party unless we've vetted them using our internal processes • Make any side agreements like keeping business away from another supplier
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<p>with third parties and disclose any personal relationships with third-party representatives</p> <ul style="list-style-type: none"> • Protect any confidential information we get from third parties and use it only for proper purposes • Speak up if you suspect a third party is violating our Code or any of our policies • Monitor third parties for as long as we work with them 	
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Following international trade laws

What we believe

As a global citizen, we follow all applicable international trade laws worldwide.

Why it matters

We operate all over the world. Our global business is subject to laws and trade restrictions for the import, export, and reexport of products, including software, technology, components, and raw materials. 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.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Know the import regulations related to marking and labeling of goods, valuation of goods, payment of duties, and record keeping for our products, solutions, and technology • Know the requirements for export and reexport. 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 it can even be just sharing information with a foreign national. Reexport generally involves the shipment or transmission of U.S. origin product or technology from one non-U.S. country to another • Know your customer and their use of our products and solutions • Conduct risk assessments and due diligence checks on third parties with whom you intend to do business 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • Do business with sanctioned countries/regions including Cuba, Iran, North Korea, Syria, or the Crimea region without <u>Ethics & Compliance</u> or <u>Legal</u> approval • Do business without proper approval with entities or individuals that are on restricted parties lists* • Allow products to be sent to a different destination than originally planned unless such an arrangement is permitted under our policies
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<ul style="list-style-type: none"> • Accurately classify and report the value, quantity, and country of origin for all imports to customs officials, and use reasonable care with respect to import activities • Alert <u>Ethics & Compliance</u> or <u>Legal</u> if a customer, supplier, or anyone else asks us to participate in a prohibited boycott 	<p>* The U.S. and other governments maintain lists that contain information about persons, foreign government agencies, companies, organizations, and other entities with which companies are restricted, in varying degrees, from engaging in trade transactions.</p>
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Our company and shareholders

We must protect the company and its value for shareholders. Each of us creates value for our company and its shareholders by acting in the company’s best interests, protecting personal data and our assets, using assets properly, making sure our business records are accurate, and protecting our public image. Doing these things will help create long-term success for our company and everyone with a stake in its future.

Avoiding conflicts of interest

What we believe

As associates, we are loyal and place the company’s interests over our personal interests. We avoid conflicts, or the appearance of conflicts, between our personal interests and the company’s interests.

Why it matters

How we act when we do business affects our reputation and the trust we have earned with stakeholders. Conflicts of interest can affect the decisions we make for embecta or create the appearance of unfairness or bias in our jobs, which could hurt the trust we’ve built.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Learn to recognize a potential conflict of interest • Tell a manager or <u>Ethics & Compliance</u> right away about any situation that might be a conflict of interest. Most conflicts can be avoided or sorted out if managed properly and quickly. • Ask for advice if you aren’t sure whether something is a conflict of interest 	<p><i>Don’t:</i></p> <ul style="list-style-type: none"> • Use information obtained at work regarding a potential business opportunity to invest in or develop opportunity for personal gain
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Some examples of potential conflicts of interest are:

- *Personal relationships:* You supervise or conduct business with a family member or with someone with whom you have a personal relationship

- *Outside activities:* You let a second job or activities with another organization hurt your performance, or get in the way of your role at embecta
- *Use of embecta assets:* You use embecta property, information, or resources for personal benefit or to benefit others
- *Financial interests:* You or a family member invests in or has other financial interests in a company that does business or competes with embecta (or wants to)
- *Business opportunities:* You take an opportunity that came to you as a result of your work with embecta without first offering it to embecta
- *Family members:* You let a family member get benefits they shouldn't, based on your position with embecta
- *Accepting gifts:* You accept an improper gift from a supplier or vendor

Accepting gifts and entertainment from suppliers

Strong relationships are important to our success at embecta, and sometimes it may be polite and appropriate to accept modest gifts and hospitality, such as lunches or dinners.

Although associates can accept a meal while engaged in a business purpose, they should not accept meals that exceed the values listed in the embecta Travel & Expense Policy, even if someone else is paying for the meal.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Accept gifts or hospitality if they are nominal in value and infrequent • Share gifts like promotional items or gift baskets with team members when possible • Know that the rules for giving gifts to healthcare professionals, customers, or government officials are much stricter 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • Accept cash or cash equivalents, like gift cards • Accept gifts or hospitality if they break any laws • Accept gifts or hospitality if they affect or appear to affect your ability to make good, unbiased business decisions for embecta • Ask for gifts or hospitality
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Acceptable gifts may include:

- Corporate logo items such as mugs, pens, T-shirts, etc.
- Regional or cultural gifts such as local souvenirs
- Holiday ornaments of nominal value
- Food gifts of nominal value such as fruit baskets

Preventing insider trading

What we believe

We do not engage in insider trading. We do not share information about embecta or another company that isn't already public, and we never use that type of information for personal gain or to benefit anyone else.

Why it matters

Using material, nonpublic information to get financial benefit, often by buying or selling shares, is unfair, distorts markets, and erodes the trust of our customers and their patients. It's a serious violation that can carry significant penalties, including termination of employment, fines, and even imprisonment.

<p>Do:</p> <ul style="list-style-type: none"> • Protect inside information from being released or distributed • Share inside information with embecta associates only if they need to know 	<p>Don't:</p> <ul style="list-style-type: none"> • Buy or sell embecta or other companies' shares or securities based on inside information or during a blackout period • Engage in "tipping" or share inside information with others so they can profit from it
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Protecting personal data

What we believe

We believe in making sure that personal data entrusted to us stays that way. It doesn't matter whether that personal data belongs to associates or third parties, or is protected health information (PHI) of patients. We collect, use, keep, and share personal data in compliance with privacy laws.

Why it matters

Sometimes we need to access, use, and share some types of personal data. Our customers, their patients, and our associates trust us with their personal data. We will only be able to keep that trust if we protect their privacy, honor the promises we make to use their personal data in appropriate ways, and keep that personal data safe.

Privacy laws such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA) in the U.S., the European Union's General Data Protection Regulation (GDPR), and other global or regional privacy laws set conditions on how we can use and share personal data and how to protect it.

<p>Do:</p> <ul style="list-style-type: none"> • Understand whether your job responsibilities require you to handle personal data especially in the case of protected health information • Understand and follow all privacy and data protection laws, such as HIPAA and GDPR • Use, access, or share personal data only for legitimate business purposes and in compliance with the law and embecta policies • Ensure that privacy considerations are addressed throughout each step of the information life cycle: collection, use, disclosure, retention, and destruction of personal data • Tell your manager or <u>Ethics & Compliance</u> right away about any potential loss or exposure of personal data 	<p>Don't:</p> <ul style="list-style-type: none"> • Share personal data with any person who doesn't have a business need to know, even if they're authorized to get it • Share personal data with any other company or individual unless we have a written agreement and they have appropriate controls in place to protect it
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<ul style="list-style-type: none"> • Protect personal data contained in our products and software technologies, following a privacy-by-design approach during the entire process from the design and concept phase to post-sales support • Maintain reasonable and appropriate administrative, technical, and physical safeguards needed to protect protected health information (PHI) stored electronically (e-PHI) or in other forms • Know that personal data is anything that can be used alone or combined with other available knowledge, to identify a person. This includes, but is not limited to, things like: name, date of birth, place of birth, employee or government ID number, physical or email address, and photographs or videos. 	
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Protecting our assets

What we believe

We take care of the things we own so that we can make sure product innovations and improvements can continue. This is one way we can help our customers and meet the needs of patients around the world.

Why it matters

Our company’s assets, simply put, are what we own. They’re the result of the investment, innovation, and hard work of our associates, past and present. They’re a vital part of efforts to make sure patient health advances and embecta continues to profit and maintain a competitive advantage.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Treat embecta assets as you would your own • Take reasonable steps to make sure embecta assets aren’t damaged, abused, wasted, lost, stolen, or improperly transferred outside embecta • Use information and communications systems, and the electronic data they contain, in a responsible manner • Always handle our funds honestly and responsibly, and follow our policies • Tell your manager or <u>Legal</u> about any abuse or misuse of our assets 	<p><i>Don’t:</i></p> <ul style="list-style-type: none"> • Take any of our assets away from our facilities for personal use • Allow unauthorized people—including friends and family—to use our assets
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Assets come in many forms. Some examples include:

- *Physical assets* such as land, buildings, office supplies, furnishings, machinery, chemicals, warehouse equipment, documents, vehicles, computer equipment, and phones
- *Electronic assets* such as data and files contained in our systems and servers
- Financial assets such as money and anything that can be converted to money, like stocks, bonds, loans, and deposits
- *Information assets* such as any information or data related to embecta business, including personal data
- *Intangible and other assets* such as ideas, inventions, copyrights, trademarks, patents, trade secrets, our brand, and our reputation

Safeguarding confidential information and intellectual property

What we believe

Part of what gives us an advantage over our competitors is our confidential business information and our ideas and knowledge—what’s often called intellectual property or IP. We must protect our intellectual property from being shared without permission or from being misused.

Why it matters

Our confidential information and intellectual property are among our most valuable assets. Advancement in healthcare as well as our success depend on improving and developing new products and technology. We maintain our competitive advantage and enhance our impact on society by protecting the confidential information and knowledge we own.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Make sure documents, data, and devices are safe. Use physical measures like locked doors or drawers, as well as passwords and encryption for electronic data • Know what information is confidential, what restrictions apply, how long to keep it, and how to get rid of it properly • Make sure that only people with permission visit our buildings and factories, and that they have escorts and do not enter areas that are off limits • Tell a manager or <u>Legal</u> if any information is released or exposed when it shouldn’t have been, so we can address the problem promptly and properly 	<p><i>Don’t:</i></p> <ul style="list-style-type: none"> • Share confidential or proprietary information with others—even inside our company—unless they are allowed to and have a legitimate business need to see the information • Discuss confidential matters in public places, like elevators, trains, or restaurants • Make it easy for people to view confidential information (for example, by working on a laptop on an airplane or using an unsecured Wi-Fi network) • Share passwords for our network, phones, or laptops • Download files without proper permission to an external device (such as a USB)
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Confidential information includes:

- Proprietary information, such as industrial designs and chemical formulas
- Trade secrets and other intellectual property

- Financial information that isn't public, including pricing and projections
- Sales and marketing plans
- Customer and supplier lists
- Research and development ideas and information
- Manufacturing processes
- Procurement information
- Associate information, such as compensation data
- Information concerning potential acquisitions, investments, and divestitures
- Legal opinions and attorney work product

Maintaining accurate records and accounts

What we believe

We believe in keeping good records. We keep honest, complete, and accurate records so we can make responsible business decisions and be honest with investors and government agencies.

Why it matters

Keeping reliable records helps us make good business decisions and improves our efficiency. Also, as a public company, embecta is required by securities laws to maintain accurate records and to disclose information about our business and financial performance in a timely manner. Doing that well helps fulfill our obligations and keeps the confidence of shareholders, customers, business partners, and other stakeholders.

<p><i>Do:</i></p> <ul style="list-style-type: none"> • Comply with generally accepted accounting principles, internal controls, policies, and all relevant laws and regulations • Maintain documents that honestly reflect financial transactions, without material misstatement, exaggeration, or unsubstantiated estimates • Record all accounting entries and business transactions completely, accurately, in a timely manner, and in the proper period • Submit accurate records to internal and external auditors on time • Tell your manager about anything that may be inaccurate, false, or misleading 	<p><i>Don't:</i></p> <ul style="list-style-type: none"> • Use any cash funds or other assets or liabilities that are secret or unrecorded • Mislead or misinform anyone about our business operations or finances • Create false documents or violate our Code because of any actual or perceived pressure to achieve a financial goal • Agree to any contracts with terms and conditions that don't properly reflect the actual relationship • Destroy documents we should retain to meet our financial, legal, or tax obligations, unless permitted by embecta policy
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Safeguarding our reputation

What we believe

We all have to protect our reputation by being positive and truthful when talking about our company.

Why it matters

It is important for us to maintain our reputation and trustworthiness. If we don't use one voice and share one message, it may hurt our company.

Communication with the media and investors

You should know that any discussion with someone outside of embecta—including social media posts—can be taken as an official company statement. Our customers, investors, and communities deserve accurate, complete, and clear information about embecta. We have a specially trained group that's authorized to speak on behalf of our company.

<p>Do:</p> <ul style="list-style-type: none">• Refer all external questions to <u>Public Relations</u> unless you know for sure you're authorized to answer• Tell your manager or <u>Public Relations</u> if you come across any information about our company or our products that's wrong	<p>Don't:</p> <ul style="list-style-type: none">• Share your opinion or divulge information about our company, our customers, or our business partners
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Responsible use of social media

We embrace the power of social media but take care not to share information or opinions that could hurt our company's reputation. Remember that online statements can be taken out of context, distorted, or misunderstood.

<p>Do:</p> <ul style="list-style-type: none">• Use social media in ways consistent with our values and policies• Feel free to share any posts made from an official embecta account• Report any negative post about our company to <u>Public Relations</u>• Be aware that your comments on social media could be copied by others and shared, even if you delete them or they disappear	<p>Don't:</p> <ul style="list-style-type: none">• Make negative or inaccurate remarks about embecta• Represent your personal views as those of embecta• Share confidential information, whether it's ours or from our customers, business partners, or competitors• Engage in inflammatory online exchanges with anyone disparaging the company or its products• Make statements that could in any way be construed as a product claim
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Our world

Contributing to our communities

What we believe

We believe in supporting the communities where we live and work. We also want to address broader healthcare challenges in society. We encourage our associates to get involved in these efforts.

Why it matters

Our success depends on our reputation. In part, our reputation is formed by what we do for our associates, patients, customers, communities, and the world at large. And social investing is an important part of building and maintaining our reputation.

<i>Do:</i> <ul style="list-style-type: none">• Support causes and non-profit organizations that are consistent with our values or that support health and well-being around the world and in the communities in which our associates work and live• Explore volunteer opportunities and charitable activities that enhance engagement with your community, and those that help you better understand and serve the needs of the most vulnerable populations, locally and globally	<i>Don't:</i> <ul style="list-style-type: none">• Force others to contribute to charitable organizations or other community activities
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Charitable contributions, grants, and donations

We use our resources, time, and skills to help non-profit groups, such as those that seek to expand access to healthcare, advance human potential, and help vulnerable communities increase their resiliency.

<i>Do:</i> <ul style="list-style-type: none">• Make contributions, grants, or donations to charitable, education, or research organizations in accordance with our policies• Keep records of all contributions, grants, or donations	<i>Don't:</i> <ul style="list-style-type: none">• Make contributions, grants, or donations to influence someone to buy, lease, recommend, or prescribe our products• Provide contributions, grants, or donations to individual healthcare professionals (HCPs) or government officials (GOs) for any purpose• Make a promise to make a contribution, grant, or donation on behalf of our company unless you are authorized to do so
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Respecting human rights

What we believe

We protect human rights in all areas of our business. We believe that all people should be treated with dignity and respect, and we expect our business partners to do the same.

Why it matters

As a responsible global citizen, we believe in safeguarding human rights in everything we do. We never engage in human trafficking, forced labor, child labor, or unsafe or unfair work practices.

Do:

- Follow our Global Human Rights Policy, which is based on the UN Universal Declaration of Human Rights, and the laws that apply
- Help us keep working conditions safe and healthy and maintain fair and proper compensation for all embecta associates
- Make sure our suppliers are committed to proper labor and sustainable sourcing practices that protect workers and communities
- Alert your supervisor or Ethics & Compliance when you see or suspect human rights concerns

Protecting the environment

What we believe

We believe in environmental responsibility and accountability. That's because we understand that environmental performance can have an impact on human health.

Why it matters

Climate change and population growth are placing great demands on natural resources and bringing new challenges to our business and operations. Increasing regulatory requirements and customer expectations require us to consider the environmental impact of our business and minimize our environmental footprint.

Do:

- Follow all environmental laws and embecta policies and procedures
- Safely dispose of any hazardous waste and report any spills or leaks
- Look for ways to be more efficient and safeguard energy and other resources

Participating in the political process

What we believe

We believe in a system in which we are free to engage in the political process. We participate in the political process ethically and transparently, and we separate our personal political activities from our work at embecta.

Why it matters

We believe that an open political process makes for a fairer, more efficient, and more productive society. We use our skills, knowledge, and global reach to help advance public policy.

<p>Do:</p> <ul style="list-style-type: none"> • Talk to embecta public affairs professionals to make sure you're behaving ethically and legally when dealing with elected or appointed officials on behalf of the company • Make it clear that your opinions are your own when taking part in personal political activity 	<p>Don't:</p> <ul style="list-style-type: none"> • Use company money to support candidates, political parties, ballot measures, and referendum campaigns
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Conclusion

Our Commitment

Acting with integrity is critical to embecta's success and reputation. Our commitment extends beyond compliance with the law. We believe that the best way to be a great company and to deliver value to our customers, associates, and shareholders is to be fair, honest, and ethical in our business practices and behavior at work.

Speaking up

We encourage and expect all associates to speak up and report actual or suspected violations of laws, the Code, embecta policies, or relevant industry codes. If you're unsure about how to handle a specific situation, or if you find any aspect of the Code unclear, there are a number of ways you can ask questions, raise concerns, or seek guidance, such as:

- Using the online reporting tool for the Ethics Helpline at: www.embecta.ethicspoint.com
- Calling the Ethics Helpline: China (400 120 1951), France (0-800-99-0011), Ireland (180 085 1325), or the United States (1-833-600-1032)
- Emailing Ethics & Compliance: compliance@embecta.com
- Talking to your manager or a neutral and uninvolved manager if you'd prefer
- Contacting a representative in Ethics & Compliance, Human Resources, Legal, or Internal Audit

embecta does not tolerate retaliation in any form and will always make every reasonable effort to protect your confidentiality.