

Code of Conduct



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Accelleron's Code of Conduct**



Introduction to the Code of Conduct

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Message from the CEO



I'm very pleased to present the Accelleron Code of Conduct.

Accelleron has over 100 years of success as a world leader in our field. This success has been built upon enduring values and practices that have given us a reputation for reliability, honesty, openness, and dedication.

Our long-term prosperity at Accelleron will continue to depend upon the trust of all employees, customers, suppliers, business partners, distributors and shareholders, as well as the communities and societies that we serve. The bedrock of that trust is integrity – an uncompromising collective and individual commitment to adhere to the highest standards of ethical business conduct.

Good performance is only good performance when ethically and professionally achieved, therefore, we must always strive to be fair, honest and respectful in our dealings with others, to comply with all applicable laws and regulations, and to promptly report suspected violations of this Code. Beyond that, we follow safe and healthy work routines, embrace inclusiveness and diversity, and respect human rights. Our sustainable entrepreneurship is guided by the needs of society and customers and considers our impact on society, environment and employees.

The Code applies to all of us. Accelleron managers have a special responsibility to lead by example, to anticipate and take action to mitigate risks, and to ensure that integrity is a defining characteristic of our business culture. Accelleron employees have an obligation to read, understand and adhere to the Code and, by doing so, contribute to making the company a better workplace for everyone.

To ensure that employees and other stakeholders feel free to raise concerns about potential violations, the Code contains a commitment against retaliation.

Let's work together to make sure that the Code of Conduct reflects who we are as a company and as individuals, and that it helps to advance Accelleron's reputation as a technology leader and an exemplary corporate citizen.

Thank you

Daniel Bischofberger
CEO, Accelleron



Why do we have a Code of Conduct?

Accelleron's employees work in over 50 countries. We come from many different cultural backgrounds and speak many languages. We are proud of our global workforce and its diversity gives us a competitive advantage. Accelleron employees all share a defining sense of personal and professional integrity that guides our behavior in the markets where we do business and sets us apart from our competition. Our Code of Conduct expresses our strong collective and individual commitment to integrity and provides practical guidance

to our workforce, our suppliers and business partners in how we conduct business worldwide. We live in a fast-paced and ever-changing world where technology continues to transform our work. Complex and often confusing laws and regulations govern our global business. Customers seek faster, more comprehensive and simpler solutions. In this exciting period of continuous change, we want our Code of Conduct to be a clear reminder of our constant pledge to be accountable and act always with integrity.

We are proud of our global workforce and its diversity gives us a competitive advantage.

Where the Code of Conduct applies?

Accelleron's Code of Conduct applies globally to all of Accelleron's employees, managers, officers and directors. In addition, the Code of Conduct applies to every employee of a joint venture or other entity in which Accelleron has majority ownership interest or exercises effective control, for example, through the board of directors. Accelleron will do its best to have its suppliers, contractors, business partners and other representatives acknowledge and adhere to Accelleron's Supplier Code of Conduct or apply a similar set of integrity policies and procedures with respect to business with Accelleron.

Accelleron's Code of Conduct applies globally to all of Accelleron's employees, managers, officers and directors.



Accelleron's Values



We are all entrepreneurs



We trust each other



We are curious



We go further

A photograph of two women in a laboratory setting. One woman is leaning over the other, who is working at a workstation. The background is blurred, showing laboratory equipment. A large purple diagonal shape is overlaid on the left side of the image.

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Integrity
Focus Areas



Communications

We communicate in a respectful, honest, transparent and professional manner.

Our communications reflect our reputation and brand as a forward-thinking, innovative technology leader.

Whether communicating internally or externally, regardless of the medium or channel, we protect Accellera's confidential data, provide comprehensive and accurate information, and always support open discussion and dialogue.

Accellera is a listed company, and we ensure that share price relevant non public facts are communicated according to respective rules.

Conflicts of Interest

We are committed to act in the best interests of Accelleron.

We use Accelleron's property and information only for proper and legitimate business purposes and we make decisions independently of any personal, financial or family interests. We disclose promptly any real or perceived interests that might be in conflict with the best interests of Accelleron, create an appearance of impropriety or affect our judgment in carrying out our roles at Accelleron. We avoid external engagements or activities that might interfere with our responsibilities to Accelleron or harm Accelleron's reputation.





Controllership and Money Laundering Prevention

We accurately record and report our finances, transactions and assets.

We comply with the laws that govern our financial records, accounting principles, tax obligations and financial disclosures. We further comply with laws against money laundering and are vigilant about suspicious financial transactions that may be intended to disguise the proceeds of criminal activity. We protect Accelleron property, assets and data from improper or unauthorized use and exercise care to avoid their loss, theft or damage. We use Accelleron assets for legitimate business purposes.

Fair Competition and Antitrust

We compete fairly, openly and independently.

We comply with competition and antitrust laws where we conduct business. These laws prohibit agreements restricting competition between companies at the same (i.e., competitors) or at different levels of the supply chain (e.g., resellers or suppliers), and may otherwise impose limits on the commercial behavior of companies. These laws may also require that companies seek approval for other commercial agreements that might affect competition or certain mergers and acquisitions.





Fair Employment, Diversity & Inclusion

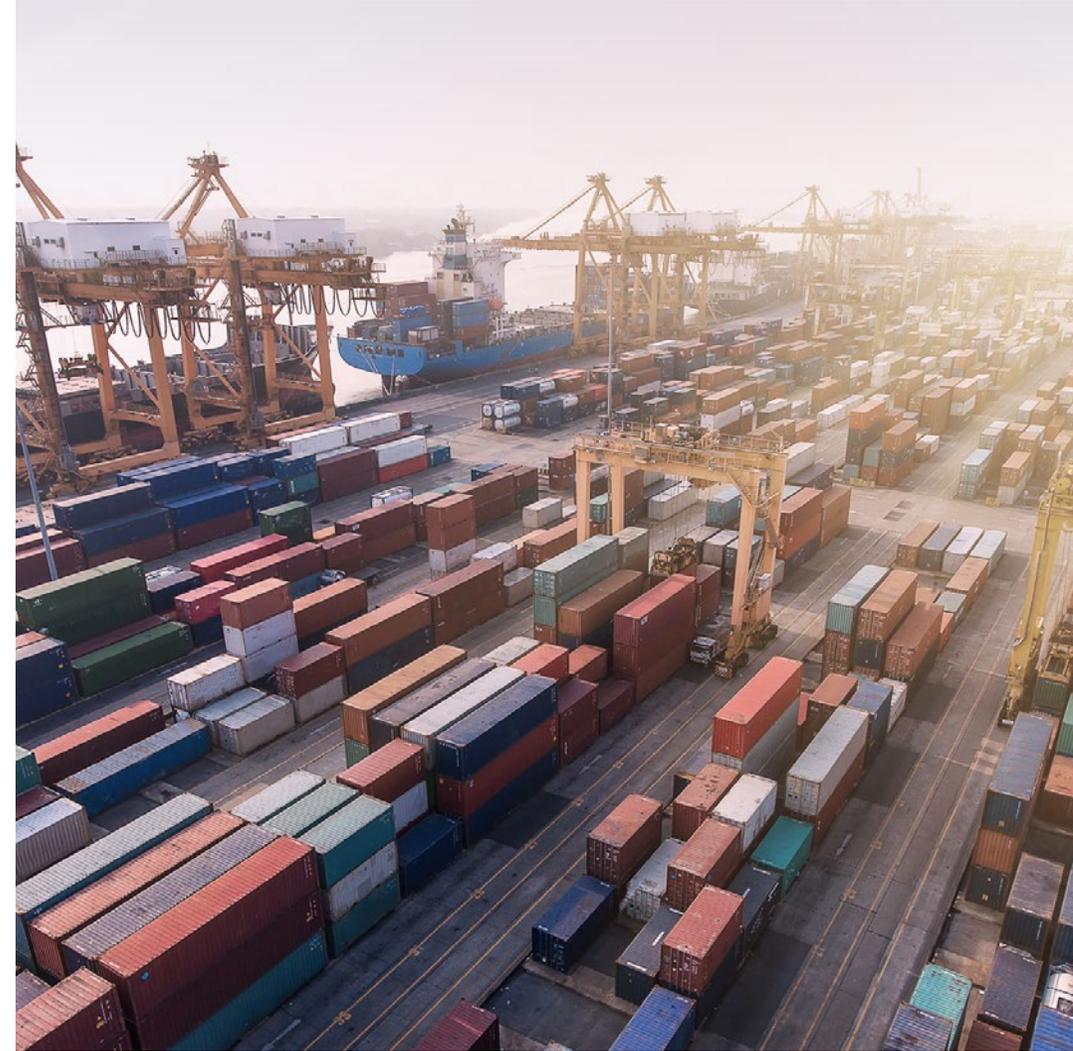
We are a global company whose employees come from many different countries, backgrounds, cultures and genders.

We believe that our diversity and the engagement of our employees are a source of strength and competitive advantage. Mutual respect and tolerance are fundamental to how we work and communicate with each other. We believe that competence, performance, attitude, social responsibility and potential should guide our employment-related decisions, such as hiring, retention, training opportunities and promotion. We follow the applicable employment and labor laws where we do business, including compensation, immigration, collective-bargaining, anti-discrimination, and similar employment rules.

Trade Compliance

We operate in a global environment.

We comply with all applicable trade sanctions and export controls laws, and we expect our business partners to do the same. Accelleron is implementing specific controls to mitigate risks related to trade compliance, including screenings on suppliers and customers to avoid breaches of international sanctions, processes to comply with the dual-use regulations, and systems to ensure accurate declarations to customs and other trade authorities.





Health, Safety and Environment

We are committed to providing a healthy and safe environment for our employees, co-workers and other contractors and we comply with the environmental laws and regulations in the countries where we do business.

We have implemented a robust Health Safety and Environment (HSE) System and workplace standards that meet or exceed legal requirements, and we expect our employees, contractors and suppliers to comply with them. Safety is one of our core values, a bedrock of our organization and central to our operations, products and services.

Human Rights

Accelleron promotes an organizational culture that supports human rights and seeks to avoid complicity in human rights abuses.

We support the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Core Conventions on Labor Standards and other national and supranational regulations. We require our suppliers, contractors and other business partners to abide by similar standards in those areas where human rights issues are commonly implicated, such as working hours and conditions, discrimination and equality, child labor, fair wages, compulsory or forced labor and modern slavery.



Anti-bribery and Corruption

We compete for business strictly on its merits. We do not offer or give anything of value to any private person, governmental official, or charitable or political organization for any unlawful, corrupt or improper purpose or for facilitating a routine government service or action. Likewise, we do not allow third parties, such as suppliers or distributors, to do so on our behalf. We only enter business relationships with reputable third parties that share our ethical standards and take proper steps to manage and monitor compliance to their anti-corruption commitments.

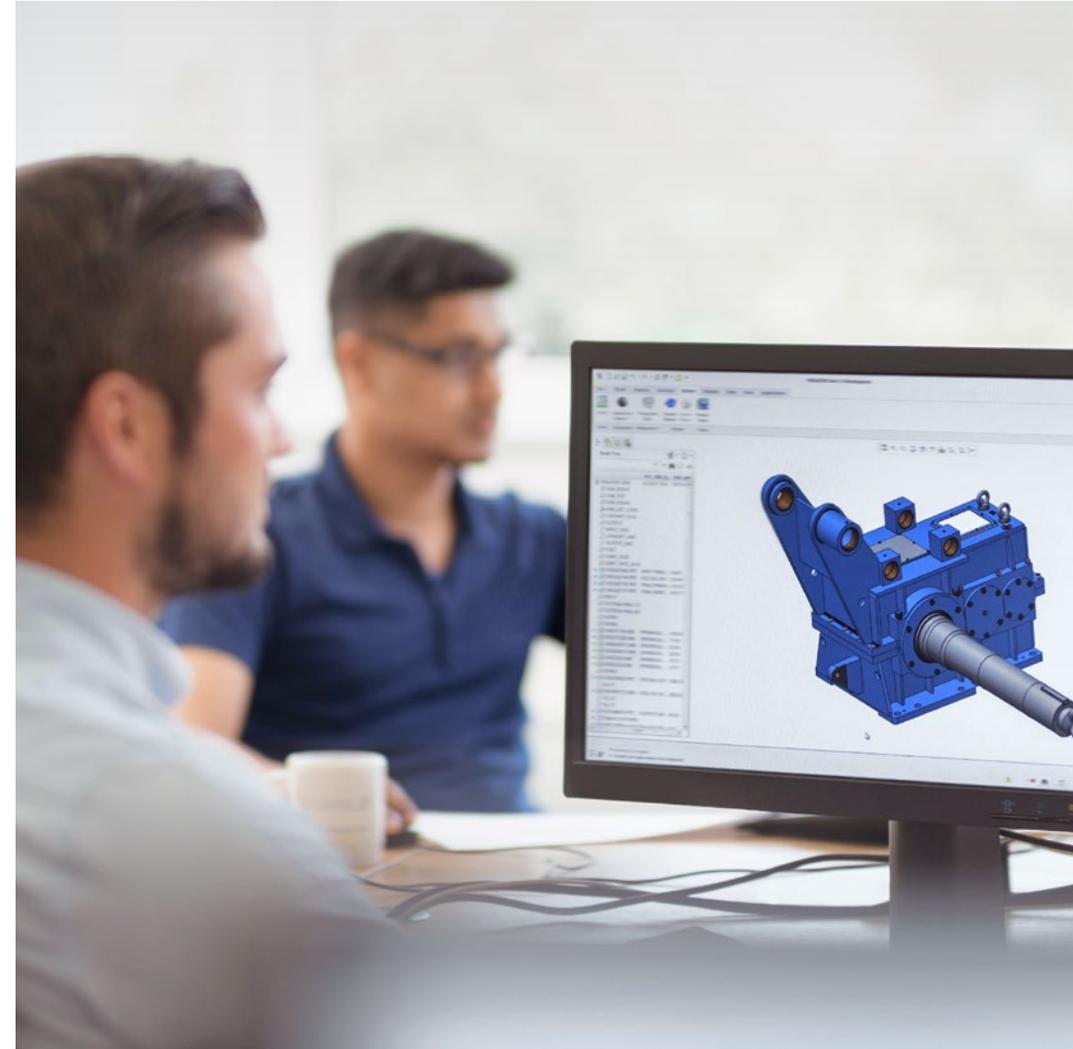
We comply with all applicable anti-corruption laws in the countries where we conduct business, including the Swiss Criminal Code, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.



Information and Technology Security

We use information technology to advance the business interests of Accelleron and our customers.

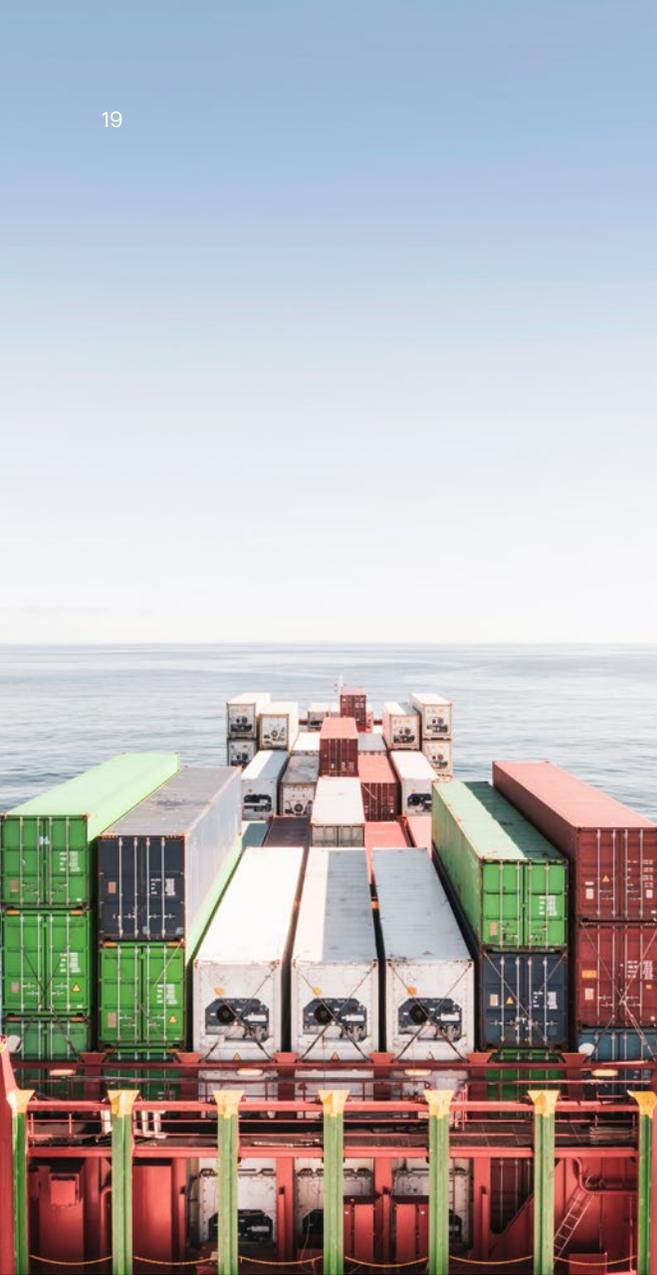
We recognize that the use of information technology and associated systems such as email, software, networks, applications, internet and social media might all be subject to cyberattacks and other similar internal and external threats. We use our information technology responsibly, only for legitimate business purposes, consistent with Accelleron's interests and rights, and in accordance with Accelleron's rules and guidance regarding our information technology systems.



Inside Information and Insider Trading

We do not use material non-public information about Accelleron or any other company for personal financial gain or advantage and we keep it protected.

Such information may include projections of future earnings or losses, pricing, proposals, changes in personnel, business acquisitions or divestitures, unpublished information about new products or services or any other non-public information that, if disclosed, might influence a person's decision to buy, sell or hold a company's securities. We also do not communicate such information to anyone who is not entitled to be aware of it. Trading on such information or providing it to someone else impairs the integrity of the market and could be a violation of the law.



Intellectual Property and Confidential Information

We take great pride in our spirit of innovation.

Accelleron is building on an outstanding market reputation and continuously adds to its portfolio of intellectual property that is incorporated into patents, copyrights, trademarks, service marks, trade secrets, design rights, and other proprietary rights. We also possess vast amounts of know-how and other confidential information that give us a competitive edge in the marketplace. We vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, marking and handling of such property and information. We respect the intellectual property and confidential information of others and expect the same from others in return.





Data Privacy

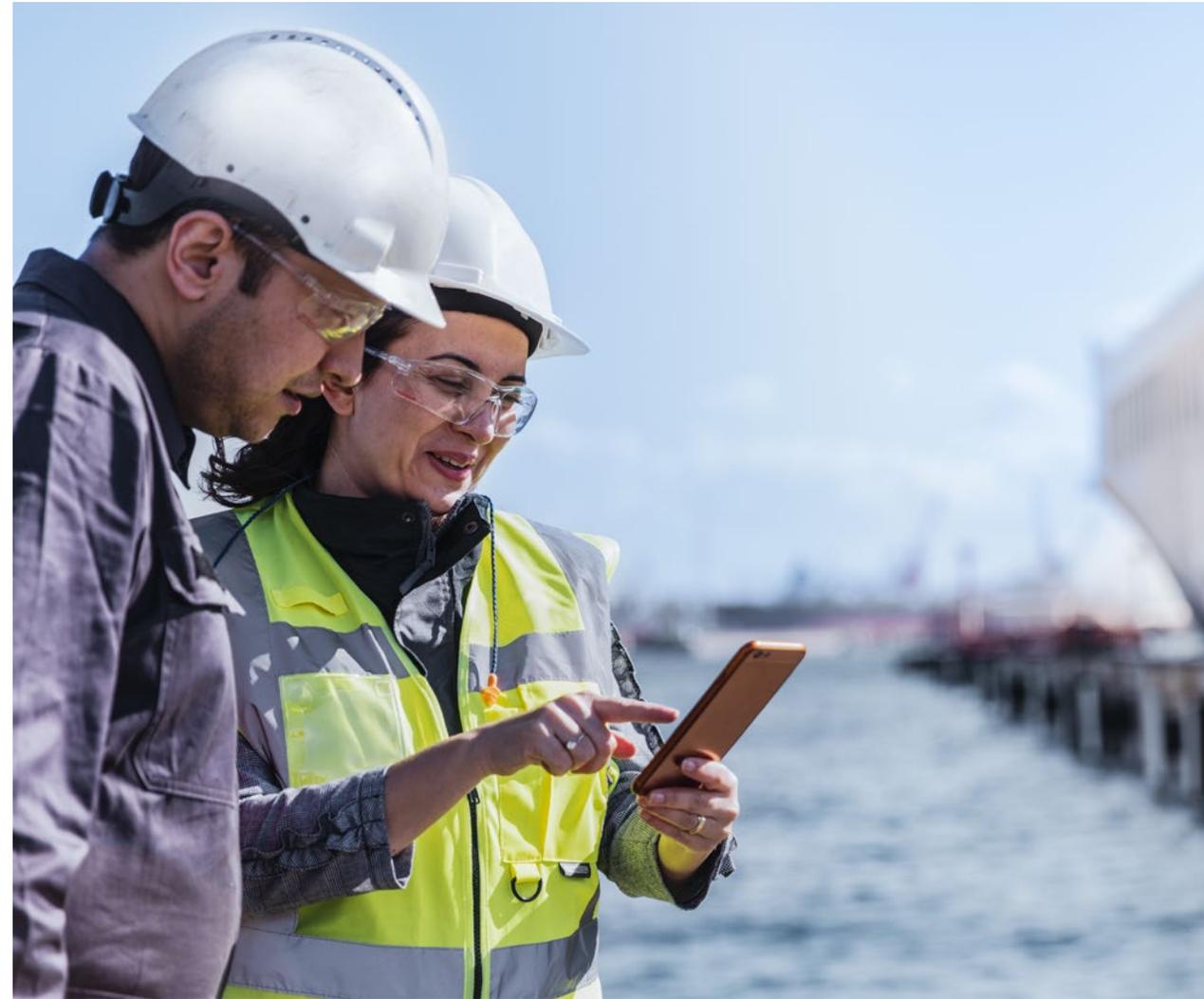
We acknowledge the importance of personal data protection and believe that the principles behind data protection strengthen individual rights.

We collect, use, store, handle, transfer and disclose personal data for legitimate business purposes and in accordance with applicable laws and expect our suppliers and business partners to do the same. Accelleron's standards for safeguarding personal data ensures protection against unauthorized or excessive use or disclosure.

Working with Suppliers

We seek to work with suppliers who share our commitment to integrity and have agreed to our Supplier Code of Conduct.

We follow Accelleron's procurement standards and procedures in onboarding and qualifying suppliers. We are committed within Accelleron to a transparent and competitive sourcing process and to deal fairly and responsibly with our suppliers. We do not accept gifts, business gratuities or anything else of value from suppliers in violation of our policies regarding gifts, travel and hospitality.



Raising Integrity Concerns

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How to raise a concern

Our business and our success are built on the principles of integrity in our Code of Conduct.

If you become aware of any suspected or potential violations of the Code, Accelleron's policies, laws or regulations you can raise your concerns by promptly reporting it so that we can investigate and, if necessary, take appropriate action to address potential issues before they might cause harm to employees, the Company or to our reputation. Accelleron will take each concern seriously. Each concern will be managed by the Legal & Integrity team that will also coordinate the investigation, which we expect all to fully cooperate. The investigator will take reasonable steps to maintain the confidentiality of a concern. Appropriate corrective or disciplinary actions will be taken depending on the outcome of the investigation and the responsibility of the people involved.

We all have a responsibility to ensure that potential violations are addressed thoroughly and promptly and it is a breach of this Code to fail to report it.

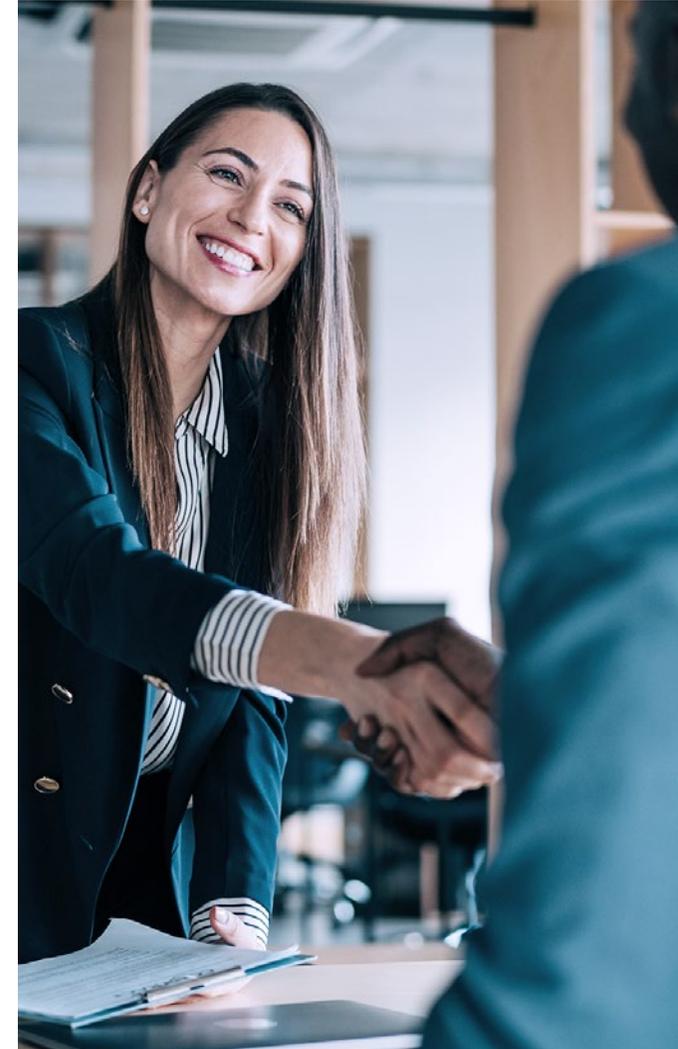
We provide multiple ways for you to report confidentially potential violations of the Code of Conduct. In addition to the methods provided below, you may speak with your line manager, your HR manager, a member of the Legal & Integrity team, the CEO or the Board of Directors.

- Visiting the Accelleron SpeakUp reporting site: accelleron.speakup.report/integrity
- Calling the Accelleron SpeakUp Hotline (Organisation Code 103051): Numbers are available at: accelleron-industries.com/integrity/speak-up
- Writing to: Accelleron Integrity Office: integrity.office@accelleron-industries.com
- Writing to: Group Integrity Office, Accelleron Industries Ltd, Bruggerstrasse 71a, 5400 Baden, Switzerland.

Accelleron's Commitment against retaliation

Accelleron desires to maintain a culture in which employees and other stakeholders feel free to raise concerns in good faith about potential violations of the Code of Conduct without fear of retaliation. Leaders are responsible for establishing the right integrity culture and tone in their organizations.

Accelleron will not tolerate any adverse employment action taken against an employee who raises an integrity concern in good faith. Any employee who retaliates will be subject to discipline, up to and including termination of employment.





Your responsibilities under the
Accelleron's Code of Conduct

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Employees' responsibilities under the Code of Conduct

Accelleron's technology, products and services make a major contribution to businesses and communities around the world. However, it is not merely what we do, but how we do it, which sets us apart from our competitors, strengthens our credibility and trust among our customers and stakeholders, and ensures our continued growth and success as an enterprise. The most critical element of how we work is integrity.

- Act ethically.
- Read and understand Accelleron's Code of Conduct.
- Know how and where to report an integrity concern.
- Report promptly all suspected violations of the Code of Conduct.
- Do not retaliate against anyone for participating in an integrity investigation or for raising a good faith integrity concern.
- Be honest and fully cooperative when asked to participate in an integrity investigation.
- Be aware of the risks that exist in the organization.
- Complete in a timely fashion the necessary integrity trainings.

The Code of Conduct imposes
on Accelleron's employees
and on those to which it applies,
important responsibilities.



Leaders' responsibilities under the Code of Conduct

The Code of Conduct imposes a high standard of ethical business conduct for all Accelleron's employees. Leaders in Accelleron, however, have special responsibilities and obligations under the Code of Conduct, and these cannot be delegated to others. This list identifies and clarifies some of the most important responsibilities of leaders under the Code of Conduct:

- Know this Code of Conduct in detail and promote it within your team.
- Provide integrity oversight and be engaged in the governance of your business.
- Know, anticipate and monitor the specific integrity and compliance risks that confront your business or function and ensure that you take appropriate actions to mitigate those risks.
- Create an atmosphere and culture in your organization that encourages, promotes and rewards integrity and diversity.
- Ensure that employees in your organization understand why it is important and beneficial to promptly report integrity

concerns and that they feel comfortable doing so without fear of retaliation.

- Ensure that your employees are alert to and properly trained on the integrity and compliance risks that confront or are present in your business operations.
- Be a visible, accountable and consistent role model for integrity so that your employees know that you will support their ethical business conduct when it matters.
- Communicate with your team regularly on matters of integrity so that they feel comfortable discussing integrity and ethical issues with you.
- Hire and promote only those employees who have a demonstrated record of high integrity and ethical behavior.
- Know how to manage confidentially and with appropriate urgency an integrity concern that an employee might raise with you directly, including reporting such a concern to the Legal & Integrity team.

Your Legal & Integrity team is available to support you in discharging these very important responsibilities at Accelleron.

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