

SARTORIUS

Code of Conduct

Simplifying Progress

January 2026

Foreword



Dear colleagues,

As a pioneer in our industry and a valued partner to our customers, we at Sartorius have solid foundations on which to build:

We are innovative, we are present throughout the world, we offer state-of-the-art products, and we are an outstanding team. We also play an important role in an industrial sector that positively impacts the lives of millions of people. To realize our vision of better health for more people, we comply with applicable laws and have clear guidelines and standards in place to govern

our actions – because our reputation and the trust of our employees, customers, investors, partners, and the public depend on how each and every one of us behaves.

This Code of Conduct provides guidance for our day-to-day work at Sartorius. It helps us to act appropriately and make the right decisions in any given situation so that we can live up to our high standards for ethical business conduct and corporate governance. By adhering to this Code, we are fostering a culture of integrity, professionalism, and mutual respect.

Let's pull together and take our responsibility seriously by familiarizing ourselves with the Code of Conduct and actively implementing it. This way, we are all contributing to the sustainable success of our company.

Thank you very much for your support.

Michael Grosse
CEO

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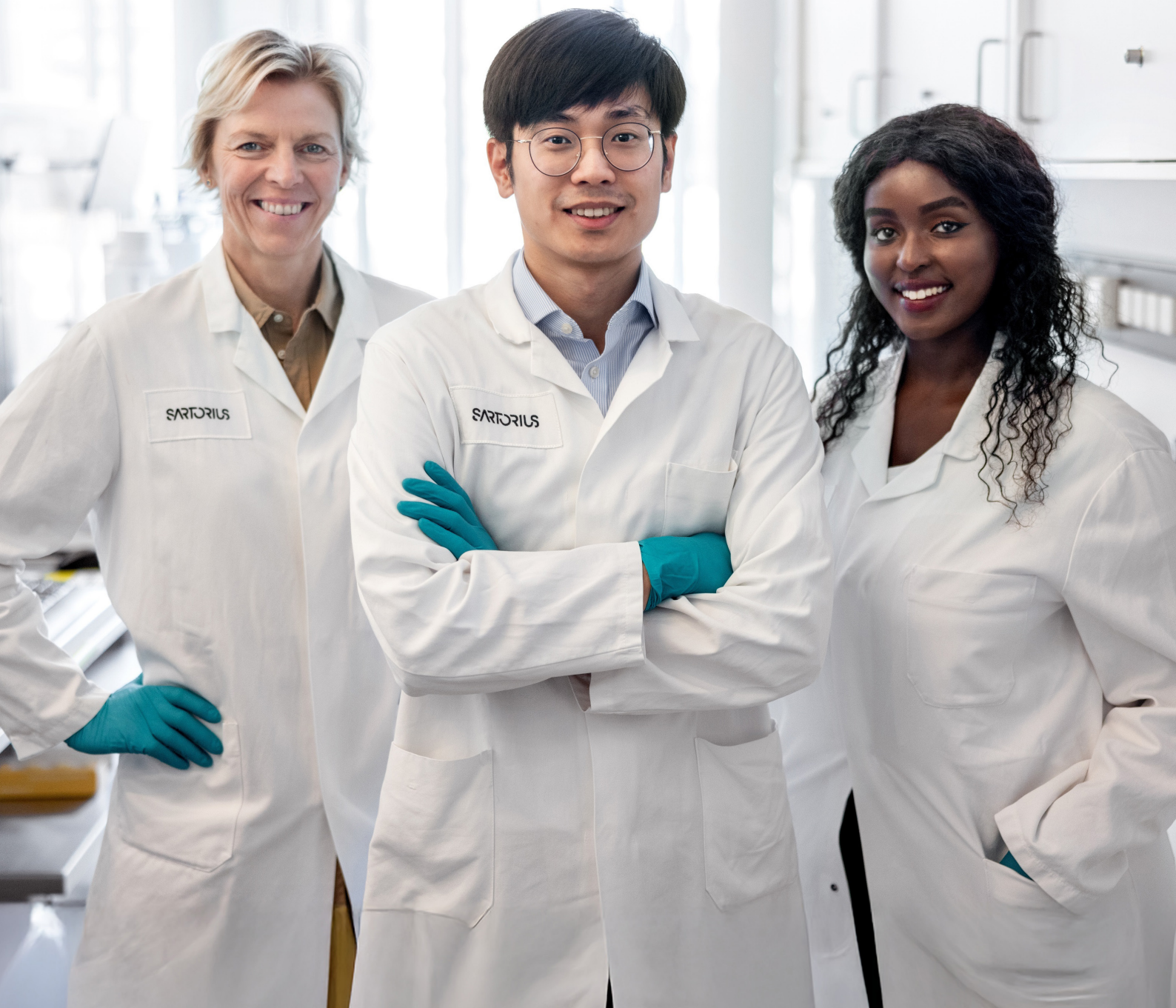
Our Code as a Guide

This Code of Conduct applies to all Sartorius employees regardless of their position, area of responsibility, or location. Managers are expected to set an example; they are required in particular to demonstrate integrity and social responsibility in their own conduct and to support their teams in also acting ethically and in accordance with the law.

Our actions are based on the fundamental principles of compliance with the law, a sense of responsibility, and integrity. This Code of Conduct serves as a compass for every employee, providing us with binding guidelines for lawful and ethical conduct. It is designed to help us identify and confidently overcome legal and moral challenges in our daily work.

Answering “no” to any of the following questions may provide initial indications of questionable conduct:

- Is my behavior legal?
- Is my behavior consistent with our values and guidelines?
- Is my behavior uninfluenced by any personal interests not covered in my employment contract?
- Would my behavior stand up to public scrutiny or media coverage?



Our Conduct in the Workplace



Compliance with the Law

Compliance with laws and regulations is a given for us. As an internationally active company, we adhere to the legal framework of the countries in which we operate. In addition, we comply with internal company guidelines and specifications, such as this Code of Conduct. In the event of discrepancies between these two frameworks, we will always give precedence to whichever regulation is the stricter.

Interacting with Third Parties

Sartorius employees may be perceived as representatives of the company not only by customers, but also by the general public and people with whom they come into contact in their private lives. A respectful, engaging manner that treats others as equals contributes to a positive public image for our company and to successful, lasting relationships.

In accordance with our **Communication Guidelines**, we only make official statements about Sartorius if we are authorized to do so.

Respecting the Four-Eyes Principle

Everyone makes mistakes. We therefore do not view control mechanisms as a sign of mistrust, but rather as a guarantee of diligence and professionalism in our daily work.

At Sartorius, the four-eyes principle is firmly anchored in the company as a central pillar of integrity and transparency. It stipulates that at least two suitable employees must be involved in and approve all business transactions that are critical in terms of decision making or risk. This shared responsibility is not just for reviewing purposes but also serves to protect each individual and the company as a whole.

Examples of business transactions that are critical in terms of decision making or risk, and to which the four-eyes principle is routinely applied include:

- Payments
- Actions that are legally binding on Sartorius (e.g., conclusion of contracts)
- Procurement and the selection of suppliers
- Price and discount specifications
- Changes to master data/quality data

This list is not exhaustive. More specific requirements regarding the four-eyes principle and necessary approvals may be defined in Sartorius internal guidelines, which always take precedence in the event of a conflict. Internal guidelines are available in the **Signavio Process Portal**, for example.

If, in exceptional cases, the four-eyes principle cannot be applied (e.g., due to technical restrictions or in emergencies), we use alternative safeguards and document them carefully.

Our Responsibility for Business Integrity



Combating Corruption

Corrupt behavior has harmful effects on our company, our employees, and the entire economic system. We therefore reject all forms of corruption. All our employees share the responsibility of preventing, detecting, and investigating cases of corruption or assisting in their investigation. For the purposes of this Code, corruption is defined as any abuse of a position to gain an advantage for oneself or others, either on one's own initiative or at the instigation of a third party. Active corruption includes offering, promising, or giving an advantage in expectation of something in return; passive corruption means requesting, agreeing to receive, or accepting an advantage.

Payments or gifts to existing or potential business partners with the aim of securing a business deal or contract are not permitted. Any attempts by suppliers to influence employees with gifts during the awarding of contracts must be reported by

employees to the Corporate Compliance Team (see **Points of Contact & Reporting Channels** for contact details) either directly or via their manager.

For more detailed information and additional rules of conduct for combating corruption, please refer to the **Anti-Corruption Code**. The **Guideline for Donations and Non-Commercial Sponsorships** regulate details on this topic.

Combating Money Laundering and Terrorist Financing

We do not tolerate any business practices that could directly or indirectly be used for money laundering or terrorist financing, and we comply with the applicable laws and guidelines. Money laundering refers to the introduction of funds from criminal activities into the legal financial and

economic cycle in order to conceal their unlawful origin. Terrorist financing refers to the provision or collection of funds in the knowledge that they will be or are intended to be used, in whole or in part, for terrorist activities.

The following behaviors and situations may indicate (attempted) money laundering or terrorist financing:

- Requests to pay invoices in cash
- Lack of clarity regarding the identity of business partners or potential customers
- Attempts to pay in a currency that has not been agreed upon
- Requests to pay an amount that is higher than the amount owed
- Payments received from third parties who are not named in the contract
- Requests for payment to an account that is not the normal business account

Reporting Conflicts of Interest

A conflict of interest exists when employees are unable to perform their duties or responsibilities toward Sartorius objectively and impartially. This may be due to personal or financial interests, family relationships, or external professional activities, for example. Employees are also not permitted to make decisions that are influenced by personal gain.

All employees must report actual, potential, or suspected conflicts of interest to the Corporate Compliance Team without delay (see **Points of Contact & Reporting Channels** for contact details). To enable an appropriate assessment, the report should contain detailed information about the nature of the conflict. Sartorius investigates and documents all reported cases of conflicts of interest and takes appropriate measures to ensure that the integrity of business decisions and actions is maintained.

Examples of possible conflicts of interest:

- The brother-in-law of a purchasing manager at Sartorius works in a management position at a certain equipment supplier. The purchasing manager now intends to purchase goods from this supplier. To ensure that she is acting in accordance with company policy, she discloses the situation to the Corporate Compliance Team.
- The daughter of an employee in the Human Resources department applies for a vacant position. The employee would be involved in the application process. As he suspects that he would not be able to act objectively, he reports this conflict to the Corporate Compliance Team.
- An employee in product development has a roommate who works in the development department of one of Sartorius' competitors. The employee wonders whether she needs to take certain specifics into account in this situation and contacts the Corporate Compliance Team.

Preventing Insider Dealing

In principle, all employees are permitted to trade in securities issued by Sartorius. However, restrictions apply in this regard. For example, purchasing and selling securities using inside information is prohibited by law. In addition, certain employees are subject to temporary trading bans, most notably just before the publication of business figures. For more detailed information and regulations on this subject, please refer to our [**Insider Policy**](#).

Compliance with Export Control and Customs Regulations

As a global company, we comply with all the regulations governing the cross-border movement of goods in our business activities.

Employees involved in the import, export, or transfer of goods, services, hardware, software, or technology comply with the applicable sanctions programs and export control and customs regulations of the individual countries, as well as their guidelines and processes.

Violations may result in serious material and/or non-material damage to the entire company. For this reason, all managers take the necessary organizational precautions to ensure compliance with these regulations.

Accurate Records

We attach great importance to transparent and accurate financial and non-financial reporting. Employees in the relevant areas prepare accurate records in a responsible manner in accordance with applicable laws and accounting standards.

Our Commitment to Fair Competition



We are committed to fair competition. This means that our employees are required to act with integrity even when competing for market share. We comply with applicable laws and regulations governing competition and antitrust law at all times. Violations of antitrust regulations in particular can result in heavy fines for Sartorius and even imprisonment for the individuals involved.

No Unlawful Agreements or Concerted Practices with Competitors

Direct and indirect agreements and concerted practices between competitors that restrict competition are generally prohibited.

This includes, in particular, agreements and concerted practices regarding:

- Prices or conditions
- Markets, customer groups, or customer areas
- Production volumes or capacities
- Conduct in tenders

The prohibition covers formal contractual agreements as well as any other form of oral or written coordination, for example via email, Microsoft Teams, SMS, WhatsApp, or WeChat.

No Exchange of Competitively Sensitive Information

It is generally forbidden to exchange so-called competitively sensitive information with a competitor. Competitively sensitive information includes all information that is not readily available to the public and that enables conclusions to be drawn about the current or future market behavior of either party.

Examples include non-public information on the following:

- Prices (including margins, rebates, and other sales conditions that may affect the price)
- Costs
- Ongoing negotiations or tenders
- Customers
- Sales and marketing strategies
- Business or product development plans
- Capacities
- Purchasing quantities
- Research and development projects

In general, the information exchange must also not be conducted via third parties, for example via customers, industry or trade associations, or distribution companies such as authorized distributors or agents.

No Unlawful Restrictions on the Conduct of Business Partners

We do not enter into any agreements that improperly restrict the conduct of our customers or suppliers. We exercise particular caution when granting or receiving exclusive rights and involve Legal Affairs. The same applies to agreements and other practices that are intended to restrict the use, resale, and pricing of products. In general, we also do not tolerate attempts to influence distributors with the aim of enforcing certain minimum or fixed prices for the resale of our products.

Practical Dos and Don'ts to Compete Fairly

To ensure that we all comply with the rules of fair competition, our **Dos & Don'ts for Dealing with Competitors** provide a concise summary of the most important rules of conduct for these situations.

In addition, industry and trade association meetings by nature entail a high risk of unlawful agreements and exchanges of information with competitors. To ensure that we behave correctly at these meetings, our **Dos & Don'ts for Industry or Trade Association Meetings** contain specific guidelines for these gatherings.



Our Handling of Sensitive Information and Data



Non-Disclosure

Sartorius employees always treat matters relating to the company that are not publicly known as confidential. Among other things, these include business, manufacturing, research, and development processes, all internal reporting figures, details of the company's organization, and matters relating to business partners. Our employees adhere to this policy even after their employment has ended.

Confidential information is only made available to those within the company who need it for their work. This does not apply to the reporting of violations of the Code (**Our Speak-Up Culture**). All files, documents, and plans belong to the company, as do any personal records made by employees together with any corresponding files relating to their work for Sartorius. They must be stored carefully and handed over to the relevant Group company by the time the employment relationship ends at the latest.

Before confidential information is passed on to external parties, non-disclosure must be agreed in writing.

Data Protection

We protect the privacy of each individual and attach great importance to the responsible, secure, and traceable handling of data. Every employee is responsible for protecting the personal data entrusted to them. Examples of such data include names, addresses, telephone numbers, and dates of birth of current or former customers, employees, applicants, and business or development partners. This data is only collected, processed, forwarded, used, and stored in accordance with legal and operational requirements. A violation of data protection regulations can have significant consequences for the data subjects and companies concerned.

In our daily work, and especially when introducing new processes, we always check whether data protection requirements are being complied with. If employees have any questions or concerns regarding specific data processing, they should contact their manager or the **Group Data Protection Office**.

Information Security and the Use of IT

Information and communication technology plays a key strategic and operational role in helping us achieve our corporate goals and implement our values. Its consistent use supports us in systematically developing our business activities as an innovative and customer-oriented technology company. Information technology is an integral part of our product development, controls our production processes, and significantly supports our sales activities.

In addition, it enables us to achieve a high degree of flexibility, speed of innovation, and mobility worldwide, especially in research and supply chain management in a globalized market environment.

The availability, integrity, and confidentiality of the IT systems we use and the data they process are of paramount importance to us. Consequently, we must pay particular attention to the increasing threats posed by cyberattacks and other risks that may arise from the operation of these systems. Our employees therefore handle our IT systems and data responsibly and with a focus on security.

Our managers bear a special responsibility here, continuously promoting and developing a company-wide culture of cybersecurity through active leadership, clear communication, and targeted measures. These measures include integrating IT security into decision-making processes and supporting regular training and awareness-raising activities.

If employees are unsure or notice anything unusual when using IT systems or data, they should inform their manager or the **Information Security department** without delay.



Our Dealings with Each Other



Respectful and Fair Treatment

Together, all employees contribute to a respectful working environment by treating each other in an objective, open, friendly, and fair manner. We do not accept any form of discrimination, bullying, (sexual) harassment, coercion, threats, insults, or the threat or use of physical violence. If employees observe this type of behavior or are affected by it themselves, they are encouraged to contact the Corporate Compliance Team (see **Points of Contact & Reporting Channels** for contact details).

Equitable Participation and Inclusion

Sartorius is committed to ensuring that all employees have the opportunity to participate equitably in all of Sartorius' policies, procedures, programs and all other terms and conditions of employment on an inclusive basis. In this context, we recognize that individuals or groups of people may have unequal starting points, based on factors such as their background or personal characteristics. In addition, certain prejudices can stand in the way of appropriate behavior and objective decision making. In this regard, we ask all employees to regularly reflect on this fact and actively contribute to an inclusive work environment while avoiding attitudes and stereotypes that may affect their understanding, actions and decisions.

Social Engagement

Sartorius is happy to see employees engaging in social activities in their free time. However, the company must not become involved in political campaigns or issues as a result.

Communication

Sartorius expects its employees to ensure that all statements they make comply with applicable laws and this Code of Conduct. Our **Communication and Social Media Guidelines** provide information on how to communicate appropriately both internally and externally.

Our Responsibility for Social and Environmental Standards



In accordance with the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights, we observe the following international conventions:

- The International Bill of Human Rights, including the Universal Declaration of Human Rights and the UN Covenants on Economic, Social and Cultural Rights and on Civil and Political Rights
- The OECD Guidelines for Multinational Enterprises
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

In addition, we are committed to protecting the environment by, among other things, developing, manufacturing, and distributing our products and services in a way that conserves resources.

For more detailed information on our strategy with regard to human rights and environmental protection, and how we address these issues in our supply chain, please refer to our [**Policy Statement on Human Rights Strategy**](#).

Freely Chosen Employment

We respect people's right to freely choose their employment and do not tolerate any form of forced labor. This includes any work or service that is demanded from a person under threat of punishment and that they do not perform voluntarily, for example as a result of human trafficking or debt bondage.

Our employees are free to terminate their employment in accordance with the applicable notice period. We consider any coercive measures, such as the retention of identity documents or work permits, to be unacceptable.

Furthermore, we do not tolerate slavery, practices similar to slavery, serfdom, or other ways of exercising power or oppressing people in the workplace, such as through extreme economic or sexual exploitation or degradation. If private or public security personnel are hired, we ensure that they conduct themselves properly by providing appropriate training and supervision.

Prohibition of Child Labor

We do not tolerate child labor or any form of child exploitation. The definition of child labor is based on the principles of the ILO. In general, this is taken to mean the employment of children below the age at which compulsory schooling ends under local law, with the minimum age generally being 15 years. In addition, we observe internal company guidelines if these stipulate a higher minimum age for employment.

We respect the special vulnerability of young workers under the age of 18. In particular, they must not be allowed to perform work that, by its nature or due to the circumstances, could harm their health, safety, or morals. We also do not tolerate any form of slavery or similar practices in the value chain, such as the sale of children and child trafficking, debt bondage and serfdom, and forced or compulsory labor.

This also includes forced or compulsory recruitment for deployment in armed conflicts.

No Discrimination or Harassment

We promote a culturally varied and all-inclusive working environment. In particular, we do not discriminate or permit harassment on the basis of race, color, national or ethnic origin, social origin, health status, disability, sexual orientation, age, sex, veteran status, political opinion, religion or belief, or due to other characteristics protected by applicable law.

Appropriate Compensation

Our employees receive appropriate and competitive compensation for regular working hours and overtime. Compensation is at least equal to the minimum wage established by applicable law and is otherwise determined in accordance with the law of the place of employment. We do not withhold compensation illegally or as a punitive measure, and we disburse compensation in accordance with applicable law.

Right to Collective Bargaining and Freedom of Association

We respect the right of all employees to form and join trade unions and employee representative bodies in accordance with applicable law.

We also respect the right of trade unions to act freely and in accordance with the law of the place of employment, for example in the form of strikes or collective bargaining. We work with employee representative bodies in a constructive spirit to balance our respective interests. Employees who are members of a trade union or employee representative body, join such a body, or form one themselves are neither favored nor disadvantaged.

Health and Safety in the Workplace

We aim to provide all employees with a safe and healthy working environment and to continuously improve it. For this reason, we attach great importance to compliance with external and internal guidelines on health and safety in the workplace.

This includes in particular:

- Ensuring appropriate safety standards in the provision and maintenance of workplaces, workstations, and work equipment
- Taking adequate protective measures against hazards posed by chemical, physical, and biological substances
- Preventing excessive physical or mental fatigue by organizing work appropriately, including reasonable working hours and breaks
- Providing adequate training and instruction to the relevant employees

We also operate a health and safety management system in accordance with the relevant legal regulations.

Good Working Conditions

In addition to compliance with basic working standards, we believe that good working conditions also include an appropriate balance between work and leisure time, continuous professional development opportunities, and adequate development prospects for our employees.

No Unlawful Exploitation of Land

Our business activities do not involve the unlawful acquisition or exploitation of land, forests, or water resources that provide livelihoods for people.

Environmental Protection

We are committed to protecting the environment by developing, manufacturing, and distributing our products and services in a way that conserves resources. To this end, we work closely with our customers and business partners along the value chain.

We have an environmental management system in place to ensure compliance with applicable laws and regulations and to monitor and assess the environmental impact of our business activities. We are also guided by international standards and certifications such as ISO 14001.

Climate Protection

Our aim is to be climate neutral by 2045. To achieve this, we have made climate protection an integral part of our corporate processes. All employees reduce emissions within their own sphere of influence by being mindful of their energy consumption and by exploring and identifying further potential savings. This also includes emissions along the value chain, such as those caused by purchased goods and services and transportation.

Circularity

We aim to maximize our resource efficiency by reusing and recycling materials, hazardous substances, and water. Our employees reduce waste in their respective areas of activity and evaluate and promote options for extending the useful life of resources.

Prevention of Environmental Pollution

We take great care to avoid soil degradation and water and air pollution that could compromise the natural foundations of food production, pose a threat to health, or make access to clean drinking water and sanitation facilities difficult or impossible. In particular, we also recognize the importance of the following conventions:

- Minamata Convention on Mercury
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)

We use existing systems to handle, record, and control waste, wastewater, and emissions that could have a negative impact on human health or the environment, and treat them appropriately before they are disposed of, released, or returned to the environment.

Within their areas of responsibility, our employees reduce the use of hazardous substances as much as possible and regularly review alternatives.



Our Approach to the Code of Conduct and Consequences of Violations



Approach to the Code of Conduct

Our employees review their own conduct based on the rules contained in this Code. Managers in particular fulfill their duty to set an example by demonstrating and ensuring integrity in their everyday business conduct. The Corporate Compliance Team and the Chief Compliance Officer will be happy to help with any questions or uncertainties regarding interpretation of the Code (see **Points of Contact & Reporting Channels** for contact details). If employees notice any inconsistencies between this Code of Conduct and existing laws, regulations, contracts, agreements, and instructions, they should report them immediately to the Corporate Compliance Team.

Regular Training

It is important to us to ensure compliance with the Code of Conduct and to raise awareness of its content and values.

For this reason, all our employees are required to complete an annual training course offered by Corporate Compliance.

Review of Compliance with the Code of Conduct

The Corporate Compliance Team regularly reviews compliance with the provisions of the Code of Conduct and is supported in this by other functions (e.g., Internal Audit, Human Resources).

Consequences of Violations

Any violation of the Code of Conduct will be addressed and remedied as a matter of priority. Compliance with the principles described in the Code of Conduct is of paramount importance to Sartorius, and violations by employees may result in consequences.

Depending on the severity and nature of the violation, these may include criminal charges, civil lawsuits, or measures under labor law. Locations with employee representative bodies will involve these bodies in accordance with local legal requirements.

Amendment of the Code of Conduct

Corporate Compliance reviews the appropriateness and effectiveness of the Code of Conduct on an ad hoc basis and at regular intervals and reserves the right to make amendments if necessary. The rights of employee representative bodies are taken into account in this process. The review includes, in particular, an assessment of the current risk landscape, feedback from the workforce, and changes in relevant legislation and best practice. In addition, reports are regularly submitted to the Executive Board and the Supervisory Board in accordance with the **Compliance Management Handbook**.

Our Speak-Up Culture

Violations of applicable laws and regulations can pose significant risks to Sartorius and to each individual employee. It is therefore part of our culture to ensure not only that all employees comply with applicable laws and regulations, but also that any instances of non-compliance are identified, investigated, and prevented in the future. Anyone inside or outside Sartorius can report possible violations of laws or regulations, including violations of this Code of Conduct, as well as risks and violations in the areas of human rights and environmental protection. Various channels are available for this purpose (see [Points of Contact & Reporting Channels](#)). For more detailed information and regulations on this subject, please refer to the [Speak-Up Policy](#).

Our aim is to create an open and safe working environment in which questions, doubts, and concerns can be expressed without fear. We are therefore committed to a policy of non-retaliation. Employees and third parties who are protected by applicable laws should not fear any negative consequences of a discriminatory or disciplinary nature if they report something in good faith or express questions, doubts, or concerns. Although protection is not guaranteed if the person making the report was involved in the violation themselves, the fact that they reported the violation may be considered a mitigating factor in the event of disciplinary action. For more detailed information on the procedure for whistleblowers, please refer to our [Speak-Up Policy](#) and our [Rules of Procedure for Whistleblowers](#).

Points of Contact & Reporting Channels

Employees and third parties can contact the Corporate Compliance Team directly (also anonymously) in several languages and at any time of the day or night to report concerns or ask questions about this Code of Conduct. We have set up various global and local reporting channels for this purpose (see on the right).

The Chief Compliance Officer and the entire Corporate Compliance Team are also available as points of contact.

In addition, all employees always have the option of contacting their manager, who will forward any reports received to the Corporate Compliance Team without delay.



Email to: compliance@sartorius.com



[Whistleblower portal](#)



Toll-free number: 00800 22 44 22 11;
toll number: 0049 551 50 41 99 41



Local reporting channels for individual companies in accordance with legal requirements

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