I. INTRODUCTION

At QuidelOrtho Corporation (together with its subsidiaries, the “Company”), we improve and save lives. As we pursue our goals as a leading provider of diagnostic healthcare solutions world-wide, it is important that each Company supplier and distributor complies with the Company’s policies concerning ethics and business conduct. We enable our customers to optimize the long-term value for patients through our innovative solutions and services. We do that by reimagining what is possible, and by conducting our business with honesty, integrity, and the highest standards of business ethics.

This Supplier and Distributor Code of Conduct and Ethics (“Code”) sets forth the requirements and expectations that the Company has for its vendors, service providers, contractors, consultants, representatives, and any of their respective employees or subcontractors (“Suppliers and Distributors”). The Company expects its Suppliers and Distributors to have a clear understanding of our expectations and to comply with those expectations when doing business with the Company. All Suppliers and Distributors are expected to read and fully comply with the principles set forth in this Code as a condition of doing business with the Company. In addition, Suppliers and Distributors are expected to implement and maintain a management system that facilitates compliance with the principles set forth in this Code, identifies and mitigates related risks and enables continual improvement.

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

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

II. ETHICAL EXPECTATIONS OF SUPPLIERS AND DISTRIBUTORS

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

A. Compliance with Laws
All standards set forth in this Code are subject to compliance with applicable local laws. We expect our Suppliers and Distributors to operate in full compliance with the laws of all countries in which they conduct business or to which they are subject. If any requirement that the Company imposes in this Code conflicts with local laws, the law takes precedence. Should this occur, Suppliers and Distributors are required to promptly inform the Company of the conflict.

Suppliers and Distributors are prohibited from violating, misappropriating, or infringing upon intellectual property rights of the Company or any other third party. In addition, Suppliers and Distributors are prohibited from engaging in activities that would violate any applicable laws or regulations, including those relating to:

- bribery, corruption, or other illegal payments
- unfair competition
- unfair or deceptive trade practices
- the environment
- data privacy and confidentiality of information of workers, patients, clinical trial participants and others
- health and safety
- Registration, Evaluation, Authorization and Restrictions of Chemicals (REACH)
- Restriction of Hazardous Substances (RoHS)
- conflict minerals
- international trade, including imports, exports, and economic sanctions
- money laundering
- employment
- healthcare regulations
- debarment
- contracting and doing business with government entities

B. Accounting Records

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

C. Safe and Healthy Workplace

Suppliers and Distributors will provide their employees with a safe and healthy workplace consistent with all applicable laws and regulations. Suppliers and Distributors will endeavor to meet or exceed international safety standards.

D. Environment

Suppliers and Distributors should provide goods and services in an environmentally conscientious manner. Suppliers and Distributors will obtain all applicable permits, licenses and registrations, and will comply with all applicable legislation, regulations, and industry standards.
E. Employment Standards

Suppliers and Distributors will treat their employees with respect and dignity. Under no circumstances may any employee be subject to physical, verbal, sexual, or psychological harassment or abuse in connection with their employment or in violation of any applicable law or regulation. Employees shall also be free to exercise their legally-protected rights and freedoms.

F. Discrimination

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

G. Wages, Benefits, Hours

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

H. Forced and Child Labor

Suppliers and Distributors will not use forced or involuntary labor whether in the form of prison labor, indentured labor, bonded labor, or any other form of human trafficking. Suppliers and Distributors will comply with all applicable minimum age laws and requirements and will not employ child labor.

I. Subcontractors

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

J. Conflicts of Interest

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

K. Anti-Corruption and Anti-Bribery

The Company prohibits its Suppliers and Distributors from engaging in any form of public sector or commercial bribery. Suppliers and Distributors shall not offer or provide, directly or indirectly, anything of value to a government official or to anyone acting on behalf of a transaction counterparty, in order to obtain an undue business advantage. Anything of value includes but is not limited to cash or cash-equivalent payments, gifts, entertainment, travel, and employment or internships.

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

L. Gifts and Entertainment

Unless pre-approved in writing by the Company, Suppliers and Distributors are prohibited from giving, authorizing, promising, or offering any gifts or entertainment to, for or on behalf of the Company. Similarly, Suppliers and Distributors shall not seek, and shall not be entitled to reimbursement, for any gifts or entertainment offered for or on behalf of the Company without written pre-approval. All gifts and entertainment-related expenditures must be fairly and accurately recorded in the Supplier or Distributor’s books and records.

M. Data Privacy

Suppliers and Distributors are required to take steps to ensure that any data processed, transmitted, or transferred in connection with its business with the Company is done so in a manner that is in compliance with all applicable data privacy laws and regulations.
III. MONITORING AND ENFORCING COMPLIANCE WITH THIS CODE

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

Suppliers and Distributors must notify the Company immediately upon learning that it or any person or entity undertaking any act in furtherance of its relationship with the Company has breached or may breach this Code. Non-compliance with this Code, and any litigation, investigation or government request for information regarding a violation or potential violation of law or regulation, must be reported immediately to the QuidelOrtho Ethics Hotline. The Company reserves the right to investigate suspected violations of this Code, and expects the Supplier or Distributor’s cooperation with the Company’s requests for information in connection with any such investigation. The Company reserves the right to terminate its business relationship with any Supplier or Distributor who fails or refuses to comply with the requirements of this Code.

*****

Effective Date: August 8, 2023