

Code of Conduct

Bruker Corporation

Innovation with Integrity

Our Mission

Our high-performance scientific instruments, analytical and diagnostic solutions, and comprehensive support enable the discoveries and innovation of our customers, and drive their productivity and success.

Our Purpose

We contribute meaningfully to the health, prosperity and safety of our society at large.

Our Values

We value integrity, respect and trust. Ethical behavior, equal opportunity and compliance are at the heart of our business.

Our Culture

We foster a dynamic, high-performance culture in a friendly, non-political, unbureaucratic and supportive environment for our colleagues and their families. We encourage clear and direct communication.

A Message from our CEO

Dear Bruker Colleagues—For almost 60 years at Bruker we have been advancing life sciences and healthcare around the world. In doing so, we contribute meaningfully to the health, prosperity and safety of our society at large. Every bit as important as “what” we are doing, is “how” we are doing it. At Bruker we value integrity, respect and trust. Ethical behavior is at the heart of our business and our unwavering commitment to “innovation with integrity” is a call to every one of us to pursue excellence in every aspect of our business. I am asking each Bruker employee around the world to make a personal commitment to follow our Code of Conduct and never compromise your integrity in any aspect of your job. As we look forward to our next 60 years, we must stay focused on building a sustainable business, preserving our reputation, and maintaining our customers’ trust in us, our products and our services.

- Frank Laukien, President & CEO



Your Responsibility for Compliance & Ethics

About our Code

“Innovation with Integrity” is not just a tag line at the bottom of our presentations; it is central to how we conduct our business. We all want to be proud of the success we achieve and how we achieve it. This Code of Conduct is the foundational document of our compliance and ethics program. It sets forth our commitment to doing business not only legally, but with the highest standards of ethics and integrity. The reason this is so important is because what we do reflects on who we are as a company and on our reputation among our employees, customers, suppliers, investors and the communities in which we work and live.

Our Responsibilities

This Code of Conduct applies to every employee of Bruker, including any of our businesses anywhere in the world. It also applies to all officers, directors, contractors and temporary employees of Bruker and our business units. Certain topics addressed in this code are covered in more detail in separate policies.

Unique Responsibility of Managers

Managers have a special responsibility to lead by example by:

- Promoting our ethical culture and rewarding integrity
- Serving as a sounding board for others who might be experiencing an ethical dilemma or facing a difficult decision
- Creating an environment in which employees feel comfortable speaking up, asking questions or reporting concerns.

Making Ethical Decisions

This Code cannot address every situation we might encounter as we do our jobs. In such a case, we should each ask ourselves:

- Is it legal?
- Does it feel like the right thing to do?
- Would I feel comfortable if my family found out about it?
- Would I feel OK if it was reported in the newspaper?
- Would it reflect positively on Bruker’s reputation?

If the answer to all of these questions is yes, then proceed with confidence. If the answer to any one of these questions is no, seek guidance and ask additional questions.



Asking Questions

We want to hear from you about any:

- Guidance you might need about a particular legal or ethical dilemma
- Questions you might have about our policies
- Concerns you have about questionable behavior
- Violations or potential violations of this Code or the law

We encourage you to report observed or suspected non-compliance with laws or company policy. When we ask questions or report concerns, we not only improve Bruker's ability to fix potential problems before they become severe, but we also shed light on potential opportunities to improve and clarify our policies, communications or trainings.

There are a number of place you can go for help or direction:

- Your manager
- Your HR business partner
- Any member of your legal or compliance team
- Our confidential reporting hotline or website, which are operated by an independent third party.

You can find the hotline number and web address for your country on the last page of this Code. You can identify yourself or remain anonymous (where anonymity is permitted by local law) using either of these methods. We have found that if you identify yourself when asking a question or reporting a concern, it helps us provide more thoughtful answers and conduct more effective and thorough investigations.

Q: What happens when I call the hotline?

A: Hotline calls or web reports are answered by an independent third party, called EthicsPoint. An EthicsPoint employee will answer your call or web report in local language and ask for information about the matter you wish to report. If anonymity is permitted in your country, you do not need to provide your name. The EthicsPoint employee will provide you with a case number and call back date and will then send your report to the Bruker Legal/Compliance department. Legal/Compliance will investigate the matter you report and, if they have any follow-up questions for you, they will send them to the EthicsPoint employee who will read them to you when you call back on your call back date or you will see it online when you log back into your online report. You can then provide follow-up information needed to assist Legal/Compliance with its investigation. This is how your confidentiality and anonymity is protected.



No Retaliation

We have a strict no retaliation policy for any reports made in good faith.

- This means no person will be disciplined in any way for reporting a concern in good faith or for cooperating in an investigation.
- Retaliation is grounds for discipline and possibly termination for anyone who retaliates against an employee who makes a good faith report.
- "Good faith" means that you do not have to be right that an actual violation occurred. You only have to be truthful about the facts that led you to be concerned and genuinely believe that there is some sort of wrongdoing and report the facts to the best of your knowledge.
- This non-retaliation policy applies regardless of which channel you select to report your concern.

While we prefer to resolve matters internally when possible, nothing should discourage you from reporting any illegal activity or violation of law to the appropriate authorities.

Q: Where can I find our company policies?

A: On our company-wide compliance intranet at https://intranet.bruker.com/sites/BRKR_Compliance. Or you can email complianceofficer@bruker.com to request copies.



-Falko Busse
Bruker BioSpin Group President

"Real integrity is doing the right thing, knowing that nobody's going to know whether you did it or not."



Integrity in our Business Activities

Complying with Laws

First and foremost, we expect all of our employees to comply with all laws, rules and regulations applicable to us wherever we do business. This is important not only because it is the right thing to do, but also because it avoids problems that could disrupt our business or damage our reputation. Always use good judgement and common sense and ask for advice if you are ever uncertain about what to do.

Avoiding Conflicts of Interest

We must always act in the best interests of Bruker and refrain from engaging in any activity that presents a “conflict of interest.” A conflict may occur when our personal or family interests interfere, or appear to interfere, with the interests of Bruker or when our personal circumstances impact our ability to make an objective business decision for Bruker.

Common conflicts of interest that must be approved by your manager or the Legal/Compliance department include:

- Outside jobs, especially with customers, competitors or other business partners.
- Entering business relationships on behalf of Bruker with people or companies with which we have a personal relationship.
- Serving on the board of another company, especially a customer or competitor.
- Opportunities that we learn about through work that belong to Bruker or in which Bruker might have an interest (such as an investment opportunity).

Q: How can I tell if I have a conflict of interest?

A: Ask yourself these questions:

- Do my outside interests influence (or appear to influence) my ability to make a good business decision for Bruker?
- Do I stand to benefit from my involvement in this situation?
Does a relative stand to benefit?
- Could my participation interfere with my ability to do my job?
- Is the situation causing me to put my interests ahead of Bruker's?
- If the situation became public knowledge, would I or Bruker be embarrassed?

If you answered yes to any of these questions, you likely have a conflict of interests and should seek guidance from your manager or the Legal/Compliance department.



Preventing Bribery and Corruption

At Bruker, we do not offer or accept anything of value that is intended to improperly influence a business decision. This includes for example:

- Bribes
- Kickbacks
- Extortion
- Fraud

We understand that business practices like these can not only harm our company and our reputation, but they can also damage developing economies around the world. Most governments are taking aggressive steps to combat corruption and we are committed to doing our part as a global corporate citizen to assist with this effort.

We do not tolerate any form of bribery, public or private. Any payment made to government officials and commercial partners must be for reasonable and properly documented business expenses and cannot be for the purpose of securing an improper business advantage.

We have separate Anti-Bribery policies posted on our Bruker compliance intranet: https://intranet.bruker.com/sites/BRKR_compliance

Q: Are there bribery risks associated with using third party agents or intermediaries?

A: Yes, it is important to remember that if you are not permitted to do something directly, you cannot engage a third party to do it on your behalf because their actions may be attributed to you. To protect Bruker, we vet certain third parties conducting business on our behalf through a background check tool and by following our Third-Party Due Diligence Policy, which can be found on our compliance intranet.



-Gerald Herman
Chief Financial Officer

"Strive to do good in everything you do and success inevitably will follow."

"Play by the rules! We like to win but always, always playing by the rules; we have zero tolerance for anything otherwise."



-Mark Munch
Bruker Nano Group President

Gifts and Business Entertainment

We value professional objectivity in our business relationships. Our guiding principle is that we do not receive or give any gift if it is intended to influence our business decision or another party's business decision. We must not accept any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with us, other than items of insignificant value. Any gifts more than insignificant value or that are intended to influence any business decision must be returned immediately. If return is not practical, the gift should be given to Bruker for charitable donation or another appropriate disposition. We never provide or accept gifts of cash or cash equivalents.

Common sense and moderation should prevail in business meals and entertainment as well. Only provide or accept business entertainment to or from anyone doing business, or seeking to do business, with us if the meals and entertainment are:

- Infrequent
- Modest
- Intended to serve legitimate business goals
- Without expecting any return favor or benefit

We have separate Anti-Bribery policies posted on our Bruker compliance intranet: https://intranet.bruker.com/sites/BRKR_compliance

Q: Can I accept a business meal from a supplier or customer?

A: In most circumstances, modest and infrequent business meals may be accepted. But, when a vendor or customer pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or even appear to be compromised. For example, if the meal is offered as part of general relationship building, the meal may be acceptable. But if the meal is offered during contract negotiations, you may wish to politely decline the invitation to avoid any impression that the meal will sway your business judgement regarding the contract.



Export Compliance and International Trade

As a global company, we transfer goods, software, services and technologies around the world. Our business transactions are subject to various trade compliance laws, including:

- Government-imposed export controls, trade restrictions, trade embargoes, economic sanctions and boycotts
- Sanctions by different governments around the world that restrict activities with certain countries, entities or individuals

We are committed to ensuring that our business transactions are accomplished in compliance with applicable international trade or export compliance laws. If you are involved in the movement of our products, software, services or technology across international borders, make sure you:

- Ensure that everything is classified correctly, in advance, based on the country of origin, the destination, the end use, and the end user
- Include all required documentation, labeling, licensing, permits and approvals
- Consult the export compliance team for your business or the Legal/ Compliance department

Please refer to the Export Compliance page on our intranet.

"Ethics and integrity walk hand in hand. They cannot be checked at the door, or put on a rack for convenience."



-Burkhard Prause
BEST Group President



Respect in our Workplace

Diversity

As a multi-national company committed to excellence, we embrace diversity and strive to create an inclusive culture that permits every one of our employees to feel empowered to achieve excellence. More than simply prohibiting discrimination, Bruker welcomes people of different race, ethnicity, nationality, gender, gender identity, religion, age, marital status, family structure, sexual orientation, veteran status, physical and mental abilities, and appearance, as well as people with diverse opinions, political views, perspectives, lifestyles, ideas, thinking and approach. We believe that innovation and creativity are enhanced as various ideas, concepts and approaches are shared. Diversity makes us a stronger company and is critical to our success.

Harassment-free Work Environment; Respectful Workplace

We strive to create an environment where every employee is treated with dignity, respect and fairness. We make recruiting, retention, and other performance-management related decisions solely on the basis of merit and other organizational considerations, such as a person's ability to do their job with excellence and in alignment with our strategic and operational objectives.

We will not tolerate any form of workplace harassment or abuse. We should each act professionally in all job-related activities, including offsite work events. We do not tolerate verbal or physical threats or behavior that is intimidating, humiliating or any acts of violence. We expect everyone to be respectful in communications with others including electronic and online communications such as email, texts, instant messaging, online chats, blogs and posts on social media.

Q: My manager often loses his temper and yells at people on the team when we miss a deadline. Is that harassment?

A: It depends, but regardless, the situation creates a negative work environment and is not consistent with our commitment to treating each other professionally and respectfully. Share your concerns with HR or the Legal/Compliance department. They can also help determine if your manager's behavior constitutes harassment.





Workplace Safety and Security

Our employees are our most valuable asset and we are committed to providing a safe, healthy and secure work environment for each of them. We do not tolerate unsafe conditions that may endanger our employees or visitors to our facilities and we strive to comply with all health and safety laws and regulations wherever we operate. We will comply with applicable national security laws and requirements which govern the hiring of individuals for sensitive government contracts, including any security clearance and similar considerations.

"How we do things is as important as what we do. In all aspects of our business, we want to be known for our relentless commitment to excellence as well as integrity."



**-Juergen Srega,
CALID Group President**

Responsibility to our Shareholders

Maintain Accurate Books and Records

Honestly and accurately reporting all business transactions is central to running an ethical business. Each of us is responsible for the accuracy and reliability of our records and reports. Accurate information is essential to our ability to make responsible business decisions and meet public reporting and transparency obligations.

Costs and revenues must be recorded in the appropriate time periods and all records must accurately reflect the true nature of the transactions they record. No undisclosed or unrecorded account or fund can be established for any purpose. No false or misleading entries can be made in our books or records for any reason, and no disbursement of corporate funds or other company property can be made without adequate supporting documentation.

Q: What does
“books and records”
mean in practice?

A: Books and records covers a wide variety of information, including presentations, spreadsheets, payroll documents, time cards, attendance records, information in filings with government agencies, inventory records, invoices, purchase orders, lab tests, market research tests, quality control tests, travel and expense reports, inspection records, transportation logs, hazardous material records, accident reports and business plans.

Confidential & Proprietary Information

Confidential information is any non-public or proprietary information related to or held by Bruker. This includes many valuable company assets, such as:

- Non-public financial information such as revenues, profits and pricing information
- Information about potential acquisitions, strategic partnerships or contracts
- Trade secrets, know-how and other intellectual property
- Unpatented inventions, ideas, methods and discoveries
- Strategic or business plans
- Information related to product launches or designs
- Employee, customer and vendor lists

It is critical to our continued growth and competitiveness that this information remain confidential and secure. Do not disclose this information to people or companies outside Bruker, unless there is a specific business purpose and a non-disclosure agreement in place, or we are required by law to disclose it. It is also important to respect our commitment to protecting the confidential information of other companies, including our suppliers and customers.



Q: I am able to get an early start on my day by returning calls during my train ride to work. Is that a problem?

A: You must be careful not to discuss non-public company information in public places where others may overhear you, such as trains, restaurants, taxis, elevators, conferences or trade shows. When it is necessary to conduct a work-related call in public, be mindful of your surroundings and what you say.

Insider Trading

In the course of our jobs, we could come into contact with material information about Bruker that is not known to the public, like financial results, potential acquisitions or technology achievements. We might also come into contact with material non-public information about other companies, like our suppliers and customers. “Material information” is information that would cause a reasonable investor to want to buy or sell a company’s stock. Until this information is officially disclosed to the public:

- Do not buy or sell Bruker stock or the stock of those other companies.
- Do not communicate that information to others who might trade on the basis of that information.

Each quarter, we are subject to a blackout period during which we cannot trade Bruker stock. That period begins two weeks before the end of our fiscal quarter and ends at the end of the second trading day after we announce our earnings for the quarter.

We have a separate Insider Trading Policy posted on the compliance intranet site: https://intranet.bruker.com/sites/BRKR_compliance. If you are uncertain whether you are prohibited from buying or selling Bruker stock or the stock of any other company that you are familiar with by virtue of your relationship with Bruker, please consult with Bruker Legal/Compliance before making that purchase or sale.

Safeguarding Our Assets

Using Social Media Responsibly

Everything you say on social media can affect the strong brand and reputation of our company. Think before you hit the “send” button because online communications last forever. Do not disclose confidential information about the company or its business on social media outlets, even if the intent is to correct inaccurate statements or defend the company. This kind of communication may result in the inadvertent release of proprietary or confidential information. Do not speak on behalf of the company or respond to questions from reporters or investors. All media or investor queries must be directed to investor relations.

Q: I saw a blog post that is critical of Bruker and contains inaccurate information about one of our products. I know the facts about that product and want to set the record straight. Is it OK to post a response online?

A: No. Unless you are an authorized spokesperson for Bruker, you should notify senior management in your business unit or Bruker Investor Relations. Provide them with the correct facts and let them address the situation on social media or otherwise.

Protect and Properly Use Bruker Assets

Protecting company assets is crucial to the success of our business. These assets include equipment, tools, materials, supplies and technology resources (such as computers, phones and mobile devices), as well as intangible assets like trademarks, copyrights and patents. Theft, loss, carelessness and waste have a direct impact on our financial performance. Use company assets for legitimate business purposes and not for personal benefit or the personal benefit of anyone else. Failure to protect our technology resources can make our electronic records vulnerable to attack by hackers. Please refer to the Information Security page on our intranet.

Q: I’m not in IT. How can I protect our information systems?

A: Every Bruker employee can protect our information security by never:

- Sharing your Bruker passwords with anyone
- Leaving your laptop or mobile device unattended
- Downloading unauthorized or unlicensed software
- Clicking on links in emails received from untrustworthy sources

All email that is processed through a Bruker mail server is considered to be the property of Bruker and must comply with this Code of Conduct. Do not store, send or receive private emails using a Bruker mail server and do not forward Bruker email to any private mail server. Bruker retains the right to store, access and review any email processed through Bruker servers in the course of conducting internal investigations and as required by law, always in compliance with applicable data privacy laws. Such reviews may only occur following the written approval of the Legal/Compliance department.

Personal Information and Privacy

We respect the privacy of every employee, business partner and others with whom we conduct business and we understand the importance of protecting their personal information. We know that they are demonstrating their trust in us when they share their personal information with us, so preserving it is critical to maintaining that trust. We do this by handling personal data responsibly and in compliance with privacy and information security laws and company policy.

We must ensure we collect, store, transfer, use, share and dispose of personal information only as permitted by law everywhere we operate and be sure to:

- Only collect personal information that is relevant
- Keep it secure, confidential and up-to-date
- Correct personal information when you become aware that it is inaccurate
- Use it only in the way it is meant to be used
- Do not share it with anyone inside or outside Bruker in an unauthorized manner
- Be mindful of what personal information you are using, why you are using it, who you are sharing it with, where it is being stored or sent, and how you intend to use it
- Retain personal information only for the time necessary to achieve your business objective or to meet minimum retention requirements.

Please refer to our Bruker data privacy intranet for more information.

Q: What types of personal information do we collect or access that must be protected?

A: Personal information is any information relating to an identifiable person or, in some cases a company, including: residential addresses, phone numbers, email addresses, government-issued identification numbers, financial information, banking details, salaries and benefits, performance records, medical or insurance records, and personal information stored by our customers while using our products or receiving our services.



Commitment to our Communities

Political Contributions

We should each feel free to engage in political activities using our own personal time and money. But it is important not to engage in any political activity using company time or resources. Make it clear that your views and actions are your own and not those of Bruker. Do not make any payments of company funds to any political party, candidate, or campaign, without permission of the most senior financial leader of your business.

Charitable Contributions

We are committed to responsible corporate citizenship and helping improve the quality of life in communities where our employees live and work. We encourage employees to engage in charitable activities or make charitable contributions using their own time and money. We may choose to make company funds available for charitable contributions or donations to certain tax-exempt organizations. Any requests for such contributions or donations must be submitted to the most senior financial leader of your business and the Legal/Compliance department. Our employees may also choose to participate in company-sponsored volunteer activities.

Protecting the Environment & Human Rights

We strive to conduct business in an environmentally responsible manner and in a way that minimizes our impact on the environment. This means not only complying with environmental laws applicable to us, but also continually assessing and improving our processes in order to advance life sciences while also remaining mindful of the impact that our operations have on the environment. We strive to reduce waste and use energy more efficiently. We recognize that we are a global corporate citizen and we respect the human rights of every individual. We do not use forced, involuntary or child labor in our facilities or condone its use in any part of our supply chain.



Integrity in our Marketplace

Open & Fair Competition

We strive to outperform our competitors fairly by offering superior products and services, and never through business practices that undermine competition. We do not collaborate with our competitors to restrain competition or trade by engaging in activities like:

- Agreeing to establish or maintain prices
- Restricting sales or allocating territories
- Setting resale prices with customers or suppliers
- Engaging in “sham bids” by encouraging other parties to engage in a bidding process that they have no intention of winning, either directly or through a third party

If a competitor discusses any of these topics, no matter how casually, it is important to stop the conversation immediately and report it to your manager or the Legal/ Compliance department.

Honest & Ethical Marketing Practices

Our customers are at the heart of everything we create. They trust our products and how we portray them. We strive to maintain high ethical standards when marketing our products and services. We truthfully and accurately represent our products and avoid misleading impressions in our marketing communications.

Gathering Competitive Intelligence

We are committed to pursuing innovative ideas that will serve our customers’ needs as well as our objective of advancing life sciences and the field of diagnostics. Understanding our competition is important to compete in today’s global marketplace. We will always obtain and make use of this competitive intelligence legally and ethically. When gathering competitive intelligence, we act with integrity by:

- Using information from public sources such as published articles, public records and brochures offered by competitors at trade shows
- Never misrepresenting ourselves or using illicit means to secure information
- Never seeking proprietary information about other companies from job applicants
- Never accepting, sharing or using any information that may have been gathered improperly

Q: I am going to a trade show. Can I go to a competitor’s booth?

A: Yes, you can go to the booth and collect any publicly distributed material. But, if you talk to anyone at the booth, identify yourself as Bruker employee and avoid conversations about business transactions or prices.

Administration of this Code

Waivers

While most of the policies contained in this code must be strictly adhered to, in very rare cases exceptions may be appropriate. Any employee who believes an exception is appropriate must obtain the prior approval of the Legal/Compliance department.

Investigations

We are committed to thoroughly investigating reports of potential violations of this Code. If we receive information regarding an alleged violation, we will:

- Evaluate the information
- Determine whether an investigation is warranted and, if so, initiate that investigation
- Determine whether disciplinary actions must be taken
- Where appropriate, report the results of the investigation to our Board of Directors

Each of us is expected to cooperate fully with any investigation regarding an alleged violation of this Code. Violation of this Code may result in potential legal liability to Bruker or cause serious damage to our reputation. Failure to comply with the Code or cooperate with an investigation may result in disciplinary action, including reprimands, warnings, demotions, reductions in salary or termination.

Amendments

We strive for continuous improvement in all aspects of our ethics and compliance program. As a result, we may amend this Code from time to time. The most current version of this Code can be found on the corporate governance page on www.bruker.com.

"We have no greater asset than the trust of our customers and employees; we must work hard to earn and deserve that trust every day."



—Kristin Caplice
Global Head of Compliance

Policy Owner: Kristin Caplice, General Counsel & Global Head of Compliance
Revised: March 31, 2019

Confidential Hotline Numbers & Websites

If you wish to report a concern regarding matters covered by this Code, you may contact the dedicated hotline for your country by visiting bruker.ethicspoint.com or by calling the number below for your country to speak with an EthicsPoint operator:

- Australia 1-800-339276
- Brazil 0800-8911667
- Canada 1-855-689-1003, 1-855-350-9393
- China 10-800-120-1239, 10-800-712-1239
- Hong Kong 800-964214
- India 000-800-100-1071, 000-800-001-6112
- Indonesia 001-803-011-3570, 007-803-011-0160
- Japan 0066-33-112505, 00531-121520
- Korea 00798-14-800-6599, 00308-110-480, 00798-1-1-009-8084
- Mexico 001-800-840-7907, 001-866-737-6850
- New Zealand 0800-447737
- Singapore 800-1204201
- South Africa 080-09-92604
- Taiwan 00801-13-7956
- Thailand 001-800-12-0665204
- United States 1-855-689-1003





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