



## **Bruker Supplier Code of Conduct**

At Bruker, which includes Bruker Corporation and all of its direct and indirect subsidiaries, we value integrity, respect and trust. Ethical behavior, equal opportunity and compliance are at the heart of our business. The words, "Innovation with Integrity" are a call to every one of us to pursue excellence in every aspect of our business. It is the cornerstone of everything we do and the basis of everything we stand for as a Company.

These same standards apply fully to all of our suppliers, which we define as vendors, agents, distributors, lead finders, consultants and any subcontractors who may engage in support of Bruker's business across the globe. These standards also apply to all employees and agents of these suppliers. Bruker believes that this Supplier Code of Conduct serves as an important framework for Bruker's suppliers to conduct their business in a legally compliant and socially responsible manner and to meet the expectations of Bruker.

It is the responsibility of all Bruker suppliers to comply with this Code of Conduct and communicate it to all of supplier's employees, and any third parties they may use in support of Bruker's business, unless a supplier has a substantially equivalent, written, fully adopted and actively monitored Code of Conduct.

### **Business Ethics**

#### **Compliance with Law**

All Bruker suppliers will comply with all applicable laws and regulations in all jurisdictions where they conduct business, including all applicable tax and financial laws and regulations.

#### **Commercial Bribery**

All Bruker suppliers will comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and all other applicable national and international anti-corruption conventions.

Additionally, Bruker suppliers must not attempt to bribe, extort, or provide kickbacks or any other improper payment or inducement, including improper gifts, to any employee, representative or agent of Bruker.

Bruker suppliers must also not accept a bribe, kickback or any other improper payment or inducement, including improper gifts, from any Bruker employee, representative or agent of Bruker. Any attempts at this must be immediately reported to Bruker management.

#### **Political Activities and Lobbying**

Suppliers may not use Bruker's resources for any political activities. Suppliers shall not make any political contributions or present any gifts in the name of Bruker to any candidate for public office or elected

officials and suppliers must ensure that any recipient of a supplier's own political contributions (including any affiliated political action committees) does not represent an endorsement from Bruker and is not intended to receive any reciprocal benefit for Bruker. Without prior written approval from Bruker senior management, suppliers may not undertake activities on behalf of Bruker that are designed to influence the decisions or actions of government officials in a manner that would require them or Bruker to register as a lobbyist, or employer of a lobbyist.

### **Export Sanctions/Terrorism Activities**

Bruker suppliers must abide by all economic sanctions or trade embargoes that the United States and any other applicable jurisdictions have adopted, whether they apply to foreign countries, political organizations, or particular foreign individuals and entities.

Suppliers should not directly or indirectly engage in or support any terrorist activity. Neither suppliers nor any of their affiliates, nor any officer or director of the supplier or any of its affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body, including but not limited to:

- The U.S. Treasury Department's Specially Designated Nationals List;
- The U.S. State Department's Terrorist Exclusion List;
- The United Nations List Pursuant to Security Council Resolution 1390 (2002) and Paragraphs 4(B) or Resolution 1267(1999) and 8(C) of Resolution 1333 (2000); or,
- The European Union List Implementing Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

### **Conflicts of Interest**

Any Bruker supplier which becomes aware of a conflict of interest is required to disclose the conflict to Bruker management immediately. A conflict of interest occurs when the private interest of a Bruker employee or supplier improperly interferes, or appears to improperly interfere, with the interests of Bruker.

### **Confidentiality**

Suppliers are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of Bruker's proprietary, confidential and personal information. Examples of what is considered Confidential Information are as follows:

Examples of confidential information include, but are not limited to:

- Trade secrets, security and other business practices or processes, policies or procedures or know-how
- Internal and external audit reports
- Nonpublic portions of examination reports and other reports or information filed with regulators
- Software, data processing programs, databases
- Customer or supplier lists, telephone or other contact lists and other information about customers
- Customer presentations

- Information about employees of customers or suppliers
- Cost, pricing or financial information
- Employee directories, lists, telephone numbers, or other information about employees
- Employee compensation, health or personnel records
- Business or marketing plans and research
- Information only posted on the Firm's internal websites
- Any information that isn't readily available from a public source
- Information that is shared between parties in confidence

## **Social Media**

Suppliers may not use any form of social media (e.g., Facebook, Twitter, YouTube, mobile app stores, blogs, internet chatrooms, bulletin boards, social and business networking sites etc.) to discuss, endorse, review, engage in, or otherwise comment on or promote Bruker's businesses, products, services or programs without advance written approval from Bruker's legal counsel or Bruker senior management.

Suppliers shall also not circulate, post or distribute (on the Internet or otherwise) any photo or video taken on Bruker's premises or at any work-related events without prior written approval from Bruker's legal counsel or Bruker senior management.

## **Supplier Relationships with Third Parties**

Bruker expects and requires that its suppliers will take all reasonable measures to ensure that their own suppliers maintain an equally rigorous position on compliance. No Bruker supplier will ever participate indirectly in any activity prohibited by this Code of Conduct by retaining a third party to perform the prohibited activity on behalf of the Bruker supplier, or by failing to properly discipline a third party found to have performed activities prohibited by this Code of Conduct.

## **Labor**

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

### **Forced, Involuntary and Child Labor**

Bruker's suppliers will not make use of involuntary labor and will comply with all applicable labor laws, rules, and regulations, including but not limited to, all laws forbidding the solicitation, facilitation, or any other use of involuntary labor. Bruker's suppliers will not make use of child or under age labor as described in Minimum Age Convention 138 and Worst Forms of Child Labour Convention 182 of the International Labor Organization.

### **Fair Treatment / Discrimination**

Bruker suppliers will comply with all applicable labor and employment laws, treating each employee with dignity and respect. Bruker suppliers will not threaten workers with or subject them to harsh or inhumane treatment, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

Bruker suppliers will not discriminate in hiring or employment practices on the basis of race, religion, age, national origin, or ethnic origin, sexual orientation, gender, gender identity, marital status, political affiliation, or disability.

### **Privacy of Bruker Employees**

Most jurisdictions have regulations relating specifically to the privacy of individuals, including employees and customers. Suppliers must be familiar with those regulations and policies that apply to them. Personal information should never be disclosed to anyone outside of Bruker except as permitted by law and in the proper conduct of our business, where disclosure is required by legal process or proper legal approval.

## **Health & Safety**

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Compliance in the areas below is required:

- Occupational Safety
- Emergency Preparedness
- Occupational Injury and Illness
- Industrial Hygiene
- Machine Safeguarding
- Sanitation, Food, and Housing (where applicable)

## **Environment**

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

### **Environmental Compliance**

Suppliers shall comply with all applicable environmental, health and safety laws, rules, and regulations. This includes the following elements:

- Environmental Permits and Reporting
- Pollution Prevention and Resource Reduction
- Hazardous Materials
- Wastewater and Solid Waste

- Air Emissions

## Management of the Code

### **Supply Chain Responsibility**

Bruker advocates responsibility in supplier sourcing practices. Suppliers shall take all necessary and reasonable measures to ensure that all reporting to Bruker is in compliance with the provisions of all applicable laws and regulations, including any requests by Bruker for information.

In circumstances where the supplier is aware that it is using any “conflict materials” or “conflict minerals” as described in the US Dodd-Frank Act, the supplier must inform Bruker.

### **Accounting Records**

Bruker suppliers must maintain proper accounting records which comply with the laws and professional requirements of each jurisdiction in which they operate. Accounting records must not in any way be intentionally false or misleading.

### **Record Keeping**

Suppliers must maintain documentation necessary to demonstrate compliance with this Code of Conduct. Bruker shall have reasonable access to such documentation upon request.

### **Reporting**

Bruker requires its suppliers to investigate all suspected violations of this Code and to report violations immediately. Bruker expects that suppliers will have a mechanism to monitor compliance and to receive reports of suspected violations from their employees in a safe manner, free from fear of retaliation.

The company reserves the right to amend, alter or terminate this Code at any time for any reason.