

# How we lead with integrity

Our Code of Conduct guides our decisions every day through its reliance on our Mission and core values

## Our North Star

Our Mission is to make diabetes more predictable so everyone can embrace life to the fullest

# Our Purpose

MiniMed exists to make life with diabetes easier. Instead of people constantly worrying about blood sugar, injections, and calculations, MiniMed designs therapeutic technology that takes on that work for them.

Our insulin pumps, glucose monitors, algorithms and software are built to work together like a healthy pancreas would – giving people more freedom to live their lives, not their condition.

The goal is simple: fewer limits, better health, and more peace of mind for anyone living with diabetes.

Ultimately, our mission is to make diabetes more predictable so everyone can embrace life to the fullest.



# Our Ways of Working (WOW)

The “Ways of Working” (WOW) principles are the key behaviors that help us achieve our strategic goals and enhance our culture of delivery.

WOW principles serve as the guidelines for how all MiniMed employees make decisions, solve problems, develop new ideas, and shape our organizational culture.

Following our WOW will help us ensure our teams across all regions and functions are working in a consistent manner that puts our core values into action and ultimately reach our North Star.



### **We're obsessed with patients and customers in everything we do.**

We always start from the customer and work backwards to simplify their experience. We eliminate the forces that reduce our ability to serve the customer with speed. We advocate for the customer in all layers and details of the business. Their loyalty is our competitive advantage.



### **We're a company of owners, and we take results personally.**

We manage for the short term and the long term. We optimize for the whole and not just our team. We despise bureaucracy and have a bias for action. Despite setbacks, we can figure out how to deliver results. We're frugal and always look for ways to do more with less. We're a performance-driven team. We value and reward results.



### **We attract, develop and retain the best people.**

We seek out the very exceptional people. Our people believe in the culture of kaizen and that learning is never complete. We solve problems quickly to unlock obstacles that prevent people from doing their best work. Our leaders take seriously their responsibility to develop and coach the next generation.



### **We insist on excellence.**

We despise mediocrity. We strive for excellence and continuously raise the bar on the quality of our products, services and processes. Defects are fixed once and for all. Our "do" equals our "say." Our leaders are both a telescope and a microscope, able to dive deep to solve problems and no job is beneath us.



### **We're courageous.**

We think big, start small and move fast. We do what is right even if it is not popular. We have the confidence to speak up, to be transparent, to challenge ideas and decisions respectfully. Conflicts are addressed openly and debated deeply. We're "all in" and united once decisions are made. "One team" is our mantra and team success is more important than individual success.



### **We let the best ideas win.**

Our people are confidently humble. We believe the best ideas should win regardless of where they come from. We listen to and seek out diverse perspectives from the outside and the inside to drive invention for our customers.

# MiniMed Operating System (MOS)

The way that we run the Company is based on the MiniMed Ways of Working (WOW) and the MiniMed Operating System (MOS) which is our framework of tools, procedures and processes to get things done and achieve transformational results across every functional area of the Company. In the short term, our MOS helps drive accountability, better decision-making, risk management, and consistent execution. In the long term, our goal is to build new capabilities to position us for scale and future growth.

# A Message from Que Dallara, MiniMed CEO

We built our company on innovation and integrity, earning trust from patients, professionals, and stakeholders.

Our Code of Conduct shapes our global business and prioritizes patients and quality, guided by ethics and integrity.

We encourage open communication and collaboration to address or prevent issues, reinforcing our culture of integrity.

This approach drives us toward our Mission to lead in innovation and improve patients' quality of life.



A handwritten signature in black ink, appearing to read 'Que'.

Que Dallara  
CEO  
MiniMed

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# I. Introduction

The MiniMed Mission is our North Star and guides our organization, giving us purpose as we use innovation and technology to improve lives worldwide. Our Mission drives us to become the life-long partner of choice by empowering patients throughout their journey to maximize their life and making diabetes more predictable is what motivates us to work each day. We are committed to providing the highest quality diabetic products and ensuring the well-being of those we serve.

## Our stakeholders

### Patients and Customers

Our Mission is centered on enhancing the lives of patients through our products and therapies. Patients, in addition to healthcare providers and all those involved in their care, form the foundation of our business. We are committed to delivering products that exemplify superior reliability, quality, and value. Our efforts and resources are dedicated to ensuring global patient access to these solutions. We prioritize open communication, uphold ethical standards, and address questions and concerns promptly and transparently. Furthermore, we maintain strict confidentiality regarding sensitive patient and customer information, protecting it with the same diligence as our own.



### Fellow Employees

All employees are responsible for holding each other accountable. Reaching the company's Mission and purpose depends

on cooperation in maintaining a healthy and safe workplace. This is supported through shared respect, appreciation, and trust. Adhering to these principles provides opportunities for both personal and professional development while enhancing the organization's overall effectiveness.

### Company and Shareholders

Our objective is to deliver equitable returns to shareholders. As stewards of the Company's resources, it is imperative that we make decisions aligned with MiniMed's best interests. We are responsible for maintaining accurate records, ensuring the appropriate use of confidential information acquired through our work, and safeguarding Company assets. Additionally, we must ensure that all parties conducting business on our behalf uphold our commitment to business integrity and compliance with established standards.

### Government Regulators

The medical device industry operates in an ever-changing environment with extensive government regulation. Regulatory authorities oversee health, safety, and market integrity by enforcing relevant laws and regulations. Compliance with applicable laws, regulations, and Company policies is required at all locations where the Company operates.

### Communities and the Public

Our Mission drives us to uphold responsible citizenship in our communities.

## Our guide to living out our Mission

This guide presents the organization's values and expected workplace behaviors. It is intended to support employees in carrying out the Mission in daily activities and interactions. The topics in this guide are arranged according to the main principles of the Mission.

## Acting within the law and our values

We have an obligation to follow all laws, regulations, and Company policies relevant to our work in the countries where we operate, as these are key to our success. Because laws differ by country and often change, it is important to stay informed and ask questions when unsure. Everyone is expected to cooperate fully and be honest during any Company investigations. Failure to comply may result in disciplinary action, including termination.

## Safeguarding our reputation

The Company's reputation for ethical conduct and integrity is a vital asset, established through the actions of both current and former employees. It is the responsibility of all team members to uphold and strengthen this legacy through their everyday professional interactions.

## Respecting our code

The principles of ethical conduct outlined in our Code are applicable to all individuals at every level of the Company. This encompasses employees, officers, directors, and all parties acting on behalf of MiniMed, including contractors, consultants,

and distributors. In representing the Company across global operations, it is essential that we consistently uphold and demonstrate these ethical standards in all aspects of our professional activities.

*We must always be honest and cooperative during any Company investigation into potential legal, regulatory, or policy violations. Failing to meet these obligations can lead to disciplinary action, up to and including termination.*

## Asking questions: why it matters

Working with integrity requires consistent honesty, accountability, and adherence to ethical principles. While these standards may seem straightforward, they can be challenging to uphold in complex work environments where objectives may not always be clear or may conflict. If you are ever uncertain about the legality of an action or its alignment with our Code of Conduct, it is advisable to seek guidance. Depending on the situation, you may consult a colleague, your manager or supervisor, a Human Resources representative, or a member of the Legal or Compliance Department. In many jurisdictions, questions or concerns can also be raised anonymously through the Voice Your Concern Line. When uncertainty arises, it is always appropriate to seek clarification to ensure proper conduct.

## Voicing your concerns

If you become aware of a situation that may involve a violation of our Code, law, or policy, you are required to report it promptly. Reporting such situations can help the Company address potential misconduct or prevent escalation. Talk to your manager as they are often in a good position to understand and respond to your concern. You can also reach out to your Human Resources contact or the Legal & Compliance teams, they are here to help you. You should feel encouraged to ask questions and empowered to express concerns made in good faith – with honesty, sincerity, and without malice.

All concerns raised will be reviewed in a timely manner. Information provided will be disclosed solely with individuals responsible for addressing the matter. When required, a team with relevant expertise will conduct investigations into any concerns. This process will be managed to ensure fairness.

During an ethical investigation, all parties are expected to cooperate fully and to provide all requested information promptly upon the initial request. If a concern is substantiated, Human Resources will recommend what, if any, disciplinary action is needed. To protect confidentiality, the details of the investigation and outcome will only be shared with those who need to know.

## Voice Your Concern Line

Questions or concerns are generally addressed most effectively within the relevant department, geography, or business unit, often through direct discussions. Local resources typically have proximity to the issue, can offer useful perspectives, and may provide timely responses. The appropriate method for raising questions or concerns varies based on the specific situation, applicable laws and regulations, individuals involved, and preferred reporting approach. If it is necessary to seek assistance outside the immediate department or to report confidentially or anonymously, the MiniMed Hotline is available in most countries for anonymous submissions via phone (1-800-488-3125) or through the Voice Your Concern Line website.

## Non-retaliation policy

Retaliation against individuals who report in good faith or who cooperate with investigations is strictly prohibited. Anyone who engages in retaliation against someone who asks questions or voices a concern will face discipline, up to and including termination, regardless of that person's position or stature within the Company. If you believe you have experienced retaliation, please contact your local Human Resources representative or the Legal & Compliance Team.

### ***What does "in good faith" mean?***

*Reporting a concern that you genuinely believe may violate our Code, policies, or the law, even if it turns out to be incorrect. However, false or bad-faith accusations may lead to disciplinary action.*

## II. Our Relationship with Each Other

Our aspiration to create and build the best solutions for people living with diabetes is more meaningful when we work in an environment that values the relationships that we build with each other. We must care about the well-being of our coworkers and share in the responsibility of creating a safe work environment based on mutual trust and respect.

### Employee wellbeing

Our Company is committed to fostering both personal and professional development among employees. Recognizing that physical and emotional wellbeing significantly influence the overall work environment, we consider such support essential to MiniMed's success and integral to our organizational values. We strive to ensure that every employee feels recognized for their contributions and experiences a sense of belonging within the Company. In addition, we provide timely and constructive feedback regarding performance and professional advancement. The Company upholds high standards of fairness and respect.



### Employee health and safety

Employee health and safety comes first at all of our locations. We must constantly strive to prevent workplace injuries, illnesses, and environmental releases by:

- following all applicable environmental, health, and safety laws and regulations;
- complying with the MiniMed Environmental Health and Safety (EHS) policies and procedures in all of our facilities;
- reporting, tracking, and developing corrective and preventive actions;
- conducting ourselves in a safe and responsible manner, according to EHS best practices;
- taking all reasonable precautions when handling hazardous or unsafe materials, and when operating machinery and equipment; and
- working to continuously reduce workplace hazards and environmental impacts.

You should immediately report any behavior or activity that jeopardizes the safety of your workplace or the environment.

*For additional information, contact your Environmental Health and Safety representative.*

## Workplace respect

We recognize and appreciate the unique differences, experiences, and capabilities that each employee brings to our organization. The diverse backgrounds and perspectives within MiniMed contribute to our distinctiveness.

We are firmly dedicated to fostering a culture in which every individual is treated with dignity and respect. Employment decisions are determined solely by job requirements and an individual's qualifications. This encompasses hiring, retention, promotion, and compensation.

MiniMed offers reasonable accommodations for employees in relation to religious beliefs and practices, disabilities, pregnancy and childbirth, and medical conditions.

*If you see, suspect, or experience harassment contact your Human Resources Leadership or Legal & Compliance, we are here to help. For additional information, contact your Environmental Health and Safety representative and review MiniMed's Workplace Safety and Security Policy.*

## Harassment

It is important to maintain a workplace environment that is free from unlawful harassment or offensive conduct. Such conduct can negatively affect the work environment and productivity and does not align with the company's policies regarding fairness and respect. Participation in conduct prohibited by the Harassment and Other Forms of Offensive Behavior Policy is not permitted.

## Workplace violence prevention and escalation

We foster a workplace at MiniMed in which physical intimidations, threats of violence, physical abuse, and weapons of any kind have no place. If you become aware of or suspect incidents or threats of workplace violence, report your concerns immediately to your manager, Human Resources or the Global Privacy & Security Office. If you believe that you or someone else on Company property may be in imminent danger, follow your site's emergency protocols, by either contacting your local law enforcement and/or notifying MiniMed Global Command Center. Then follow up internally by contacting Human Resources, your manager or supervisor or another member of the management team.

*For more details, see MiniMed's Workplace Safety and Security Policy.*

## Restricting the use of alcohol and drugs

The use of drugs or alcohol can compromise your ability to perform your job safely and may endanger the safety of others. Employees are required to refrain from working while under the influence of any substances, including alcohol, illegal drugs, and prescription medications that are misused or that impair safe work performance.

Possessing, using, selling, offering, or distributing illegal drugs or other controlled substances on Company property is strictly prohibited.

The MiniMed Employee Assistance Program (MEAP) is available as a free and confidential resource for MiniMed employees and their families who have concerns about drug or alcohol use. MEAP provides support with a range of workplace and personal issues.

## Protecting employee privacy

We are committed to safeguarding the confidentiality of personal information pertaining to all prospective, current, and former employees. If your role involves handling such information, please ensure that you:

- Adhere strictly to established protocols for accessing, using, transmitting, storing, and disposing of employee personal data.
- Restrict access to this information to authorized individuals who possess a legitimate business need.
- If you suspect that confidential information has been inadvertently accessed or disclosed – whether via email, social media, or in physical form – please contact your Human Resources representative or Legal or Compliance without delay.

### Examples of Personal Information

Personal information refers to data that can identify an individual, such as name, address, email, date of birth, driver's license, financial account details, passport, Social Security number, or other government IDs.

## The right way every day

Our reputation is shaped by the actions we take on a daily basis. Each interaction provides an opportunity to exemplify the integrity and honesty that are central to our values at MiniMed:

- We maintain our standards regardless of other's actions.
- We do not adjust our core values to align with financial objectives.
- We put patients first.

## Expectations of all employees

MiniMed expects all employees to demonstrate integrity and honesty in all professional activities. To exemplify appropriate conduct through your words and actions. In addition, to not allow external pressures to compromise your ethical standards; no individual may require you to act contrary to the Code. Employees should report any observed or suspected misconduct or unethical actions. If you have a question request guidance.

## Expectations of all leaders

All leaders are expected to uphold our Code by consistently aligning both your communication and behavior with its principles. Leaders must:

Promote an atmosphere that supports prudent risk taking and values learned from errors.

Cultivate a workplace where team members feel confident approaching you with questions and concerns.

Reassure employees, contractors, and stakeholders that retaliation is not tolerated for asking questions or voicing their concerns.

Upon receiving a concern, ensure it is properly documented and escalated through the appropriate channels.

## Culture of open communication

We all share a responsibility to promote transparent, candid, and comprehensive discussions concerning adherence to our policies and procedures.

- Share your perspective.
- Support your viewpoints.
- Raise questions when you have concerns.

We need you to be courageous and speak up, even when you think it may be unpopular.

# III. Our Relationship with Others

To achieve our Mission, we engage with patients, customers, and third parties outside the Company with the utmost integrity. We are committed to fair dealings and uphold rigorous ethical and quality standards. Additionally, we endeavor to collaborate only with third parties who adhere to these same high standards.

## Fair dealings

We are committed to ensuring that healthcare providers, patients, and customers receive comprehensive and balanced information regarding our products, including their potential benefits and risks.

We recognize the importance of allowing providers to make informed choices about the therapies or products most appropriate for their patients' individual needs and medical conditions. We respect these decisions, irrespective of whether our products are selected.

All product and therapy materials must be accurate, data-supported, and balanced. They should clearly state efficacy, quality, safety, and price, and promotion must align with each country's approvals.

We prohibit all employees from promoting products in these situations:

- Promoting a product prior to its approval
- Promoting an approved product for a use that has not been approved by the appropriate regulatory authorities

*We will provide only honest and truthful information about our competitors.*

*We will not disparage or make untrue statements about our competitors' products or services.*

## Competitive information

We adhere to high ethical and legal standards at all times and will not engage in any conduct intended to secure an improper business advantage over competitors or customers. In the course of our business operations, we routinely handle competitive information. Employees whose roles involve accessing or disseminating such information should adhere to the following guidelines:

- Utilize only lawful and appropriate methods when collecting competitive information.
- Do not engage in deception or misrepresentation while gathering information.
- If you inadvertently receive a competitor's confidential information, refrain from duplicating or forwarding it. Promptly report the incident to your manager, compliance officer, or legal counsel and await further instructions.
- Avoid recruiting individuals with the intention of acquiring confidential information from third parties.
- Ensure that agents, distributors, suppliers, consultants, and other business partners understand and comply with these guidelines when representing our Company.

## Our approach to quality assurance

We are committed to leading in patient safety, product quality, and reliability. Our aim is to be the most trusted Company for product and therapy excellence. To achieve this, we comply with all relevant laws, regulations, and standards in every stage of our operations, and require our suppliers and distributors to uphold the same standards.

Quality first means:

- We let patients safety guide all of our decisions.
- We ensure safe, effective diabetic products every day.
- We meet our regulatory commitments.
- We promptly report quality issues to management or Quality personnel.

## Reporting quality and product concerns

It is the responsibility of every individual to raise questions and communicate concerns regarding quality and safety. Additionally, we are obligated to report any product quality issues to facilitate the monitoring of product performance and to enable the implementation of appropriate corrective measures.

*If you learn of a complaint associated with a MiniMed product or therapy, you have a responsibility to report it within 48 hours.*

## Customer and patient interactions

It is vital that we maintain ethical interactions with healthcare providers and patients. We do not seek to influence healthcare professionals, patients, or customers through improper payments or benefits related to business decisions. The relationship between patients and their healthcare professionals is acknowledged. Our activities are not intended to affect the integrity of the patient-physician relationship.

*For additional information, including the BCS and Company-wide policies and procedures, visit the Office of Ethics & Compliance website.*

## Who are our customers?

A customer includes patients as well as healthcare institutions or healthcare professionals, who may purchase, prescribe, use, or arrange for the purchase or prescription of MiniMed products. *For BCS purposes, this definition also covers persons employed by a customer, their close family members, or organizations associated with the customer.*

## Innovation through collaboration

As a company in the medical technology sector, our products are used by patients globally. Ongoing innovation through partnerships aims to support advancements in technology that can benefit patients, customers, healthcare systems, and societies around the world, both in terms of health outcomes and economic considerations.

## Respecting the patient – physician relationship

We acknowledge the professional relationships established with our patients and customers, as well as the trust involved. It is also important to recognize the distinct relationship between patients and healthcare professionals, which is characterized by respect, collaboration, and trust. Physicians have a moral, ethical, and legal duty to prioritize patient welfare. Patients are entitled to expect this standard of care. Our work should not interfere with or undermine the integrity of the patient-physician relationship at any time.



*Patients' legal rights vary according to the cultural and social norms of each country or jurisdiction. All patients, regardless of location, are entitled to be treated with courtesy, respect, dignity, responsiveness, and timely attention. Patients are also entitled to receive information about products in a manner that is fair, balanced, and includes both risks and benefits. Furthermore, patients have the right to select the product or therapy that aligns best with their individual needs and medical circumstances, even if this choice is not a MiniMed product, and such decisions are respected. Patient confidentiality is a fundamental right, and all private information will be securely protected.*

## Supporting our products

To maintain the highest standards of dedication, service, and commitment, certain employees provide essential technical support for our products within various clinical environments. Their responsibilities include educating healthcare professionals

on the proper application and utilization of our products and therapies, as well as engaging with patients when appropriate and under the guidance and supervision of their healthcare providers. These individuals serve as representatives of our Company; however, they are not considered members of clinic staff and do not engage in the practice of medicine.

## Promoting our products

Upholding the integrity of the patient-physician relationship requires that we promote our products strictly in accordance with approved labeling and communicate their efficacy, quality, safety, and pricing accurately and truthfully. All information provided to patients and prescribers regarding our products and therapies—including details on availability and delivery—must be accurate, balanced, and substantiated by data and relevant experience. Promotional materials for our products must undergo thorough review and receive appropriate approval via established channels. Legal compliance mandates securing necessary approvals for our products from regulatory authorities worldwide. As each country has unique requirements, we will adhere to the specific regulations governing the marketing, sale, and promotion of our products and therapies in every jurisdiction.

## How we protect information

### Patient Data Privacy and Security

In the course of conducting our business, we need access to various types of personal information of our patients. Personal information is any information that can be used alone, or in combination with other information, to identify a specific individual. Employees, patients, and healthcare providers provide us with their personal information. They trust us to handle it with care. They expect us to use it in accordance with the law and our stated privacy notices and policies.

*For more details, see MiniMed's Global Privacy and Data Protection Policy.*

### Patient Data Privacy

As part of our jobs, we may create, develop or receive information about patients' experiences with our products and services in a variety of areas, including:

- Patient Registry
- Call Centers
- Clinical Research
- Product Quality and Assurance
- Research and Development
- Technical Support
- Marketing (Social Media)

We must always treat such patient information:

- Confidentially, according to applicable laws
- Appropriately, according to the expectations of our customers
- Respectfully, in honor of our patients' willingness to trust us to use sensitive information to oversee the quality, safety, and effectiveness of our medical devices and therapies

### Patient Data Security

Our Company enforces strict security measures to protect patient data and systems. Employees must understand and follow privacy and security policies, accessing only the patient information necessary for their job according to Company policies and laws.

If you know or believe that confidential information has been inadvertently shared or sent out, whether in email, social media, or hard copy, contact **STOP.THINK.PROTECT.** immediately.

### What Is Patient Information

Similar to employee data, patient information refers to data that can be used, either by itself or together with other details, to identify a particular person (for example, name, street address, city, state, national identifier, tdate of birth). It includes any information concerning health status, the delivery of healthcare, or payment for healthcare that is associated with an individual. Patient information also encompasses details related to a person's health condition, services received, billing records, medical charts, and insurance information.

## Third party relationships

To fulfill our Mission and conduct business effectively, MiniMed collaborates with third parties. We actively seek partners who demonstrate a commitment to quality, cost efficiency, responsiveness, corporate citizenship, and innovation. We emphasize transparent communication with all relevant external parties. In the course of these relationships, we may have access to confidential information concerning our vendors, suppliers, and other business associates. It is imperative that we protect this information and adhere strictly to all contractual agreements. This includes safeguarding third party intellectual property—such as inventions and software—from disclosure, theft, loss, or improper use.

## How we handle third party relationships

We value our distributors, suppliers, vendors, consultants, and other third-parties. We want to work with partners who share our values and who will meet our business needs.

If your job includes selecting business partners, follow these guidelines:

- Complete due diligence on potential partners.
- Have an appropriate business reason for selecting a particular third-party.
- Base every business decision on objective criteria.
- Disclose potential conflicts of interest.

How do you maintain integrity in our relationships? Before you accept a gift or an invitation from a third-party, know what is permitted. Obtain all necessary approvals in advance.

### **Definition of a third party**

*Third parties consist of organizations or potential entities, along with their representatives, from whom we acquire goods and services. Examples of such third parties include vendors, suppliers, distributors, consultants, non-governmental organizations (NGOs), and investment firms.*

# IV. Our Relationship with the Company and Shareholders

Fulfilling our obligations and achieving growth relies on our relationship with the Company and shareholders. By safeguarding Company assets and upholding ethical standards, we boost shareholder confidence and our market position.

## How we protect our assets

### Company Assets

Company resources—including workplace facilities, materials, equipment, and third-party service providers—are intended for appropriate business use. These assets have been acquired through the efforts of employees worldwide. All employees are expected to safeguard these resources against theft, loss, misuse, and waste. Limited personal use of Company equipment, such as computers or telephones, is allowed if it is minimal, does not interfere with work duties, does not present a conflict of interest, and does not create significant costs for the Company.

### Investor and Media Inquiries

To ensure consistency and compliance with all relevant laws and Company policies, it is essential that the Company communicates with a unified voice to investors, analysts, the media, and public interest groups. Accordingly, any inquiries from agencies such as investors or financial analysts should be directed to Investor Relations. Likewise, requests from members of the media or community should be referred to Public Relations.

### Confidential and Proprietary Information

The open and effective exchange of Company information is essential to our ongoing success. Much of the information relating

to our business activities is confidential and fundamental to preserving our competitive advantage. Any unauthorized disclosure of such confidential information outside MiniMed could significantly harm the interests of the Company. Therefore, it is incumbent upon all of us to safeguard corporate information diligently. As with all confidential materials, we must ensure that conversations remain private, sensitive documents are securely stored, and mobile or handheld devices are protected from theft and loss, never leaving them unattended.

If you know or believe that confidential information has been inadvertently shared or sent out in email, social media, or hard copy, please contact *STOP.THINK.PROTECT.* immediately.

### **MiniMed TIP**

*Stay aware of your surroundings when communicating inside or outside MiniMed. Avoid discussing sensitive topics on your phone or with coworkers in public spaces like elevators and airports, as conversations may be overheard. Keep documents with sensitive information secure; never leave them in accessible areas such as unlocked desks or copy machines.*

## Confidential business information

Confidential business information is information that is not generally known or readily available to others. Disclosure of this confidential information outside of MiniMed could seriously damage our interests. We are all responsible for safeguarding this information. We must also safeguard confidential information shared by our vendors, suppliers, and other business partners. Limit access to authorized persons with a legitimate business need for the information.

If you believe personal or confidential information has been inadvertently accessed or distributed, email [privacy email address once determined] immediately.

## Intellectual property

Our intellectual property is one of our most valuable assets. It includes patents, trade secrets, trademarks, copyrights, design rights, logos, know-how, photos/videos, individuals' names, and other intangible industry or commercial property.

We protect our intellectual property by obtaining patents, trademarks, and trade-secret protection. We also take precautions to prevent inappropriate disclosure, use, or loss of this information.

## Social media

The internet offers various ways to listen, learn, and communicate with internal and external stakeholders through tools such as blogs, social networking sites, and chat rooms. While these resources are useful, they also involve certain risks.

Use of social media should be conducted in a responsible and appropriate manner. As social media is public, only non-confidential information related to the Company may be shared. Information posted online should be considered permanent, regardless of subsequent edits or deletions. It is advisable to review messages carefully before posting for personal and workplace wellbeing. Limit the disclosure of personal or business details and exercise caution when using social media platforms.

For additional information, visit the STOP.THINK. PROTECT. website.

## Financial integrity

Our shareholders rely on our commitment to honesty and integrity, especially when evaluating the Company's financial performance and standing. Maintaining ethical and accurate accounting practices at all times is essential. This applies to every aspect of our financial operations, including expenditure, transactions, reporting, documentation, and adherence to global financial regulations.

## Accurate accounting

We must ensure our Company's financial information is accurate and complete. Our shareholders and regulators, among others, expect us to do so. The records we create as part of our daily responsibilities have a significant impact on the financial information our Company discloses and the decisions we make. Management personnel or financial officers involved in the preparation or communication of our public disclosures must understand and comply with our Company's standard for public disclosure.

## Falsification of records

Our commitment to honesty and integrity is demonstrated through the precise maintenance of our records. We ensure that all funds and assets are accurately disclosed at all times and that every transaction is properly documented. Only a single set of books is maintained, and no false or artificial entries are permitted under any circumstances.

## Conflict of interest

A conflict of interest occurs when our own personal activities or interests – or those of someone close to us – conflict with the best interest of our Company. We are expected to place MiniMed's best interest ahead of our own when conducting Company business. This means avoiding any perceived or actual conflict of interest. While this concept seems simple, the wide varieties of situations that may create a conflict of interest make this complex. Gifts and business courtesies, outside opportunities, and personal relationships are just a few of the many situations in which a conflict of interest may occur. If you become aware of a potential or actual conflict, you have an obligation to disclose it.

## Gifts and Business Courtesies

Gifts and business courtesies can compromise relationships with customers and third parties, leading to real or perceived conflicts of interest. Accepting such courtesies, like meals or entertainment, should be based on sound judgment and only when business reasons are appropriate. Never solicit gifts or entertainment for personal use; acceptance is permitted only in limited cases with managerial approval.

## External opportunities

We fulfil our Mission by dedicating ourselves to our responsibilities at MiniMed. Engagement in external employment or opportunities that may compromise work performance or present a conflict of interest should be strictly avoided.

## Personal relationships

Personal relationships should not influence decisions made in a professional capacity. Giving preferential treatment to family members, romantic partners, or friends in business matters is inconsistent with principles of fairness. Decisions are expected to be based on objective merit rather than personal connections.

*When you are unsure if a situation or interaction is a conflict of interest, review the Company's Conflicts of Interest Policy. If further guidance is needed, consult with your Manager, Legal Representative, or Compliance Officer.*



# V. Our Relationship with Regulators

Our commitment to dedication, honesty, integrity, and exemplary service is also reflected in our ethical engagement with government regulators.

## Clinical research

We are dedicated to safeguarding the safety, privacy, and well-being of patients participating in our clinical trials. All studies are planned and executed in accordance with the following principles:

- Established medical and ethical standards
- Additional requirements mandated by research sites or institutional ethics committees
- The cultural context, legal frameworks, and regulations of the countries in which our studies are conducted
- Precise and transparent reporting, analysis, and validation of all clinical data and findings

We adhere to the cultural norms, legal requirements, and regulatory frameworks of all countries in which our research is conducted. Our commitment extends to upholding ethical standards in clinical study execution and ensuring the accurate, transparent reporting, interpretation, and verification of all clinical data and outcomes.

## Regulatory affairs

To ensure that eligible patients have access to our products, we adhere strictly to all applicable local regulatory requirements. This encompasses obtaining necessary approvals and registrations for market entry, implementing rigorous labeling controls, and fulfilling all obligations set forth by government agencies. Furthermore, we are dedicated to fostering an open, constructive, and professional relationship with regulatory authorities regarding policy matters and submissions.

## Fair competition and antitrust laws

Competition (antitrust) laws ensure fair business practices and prohibit actions that restrain trade. These laws promote competitive markets for both buyers and sellers, and violations can occur without formal agreements, such as sharing pricing or confidential sales strategies with competitors. Do not disclose confidential information to competitors. If approached about illegal competitive activities, end the conversation immediately and notify the Legal Department. As these laws are complex and vary by country, contact MiniMed legal counsel with any questions.

**Examples of illegal competitive interactions include:**

- *Price fixing or coordinating sales terms with competitors*
- *Dividing market share among competitors*
- *Agreeing to boycott a customer*
- *Bid rigging with competitors*

## Anti-corruption

We are committed to integrity and honesty in all aspects of our business, as corruption undermines our integrity and reputation. Engaging in corrupt practices to advance our business is strictly prohibited. MiniMed will not offer or pay, directly or indirectly, anything of value to a third-party for any of these purposes:

- To improperly win or retain business
- To improperly influence individuals whose decisions could impact our business
- To gain an improper advantage in product approvals, sales, research, permitting, hiring, or any other aspect of our business
- To illegally influence the action of any patient, customer, supplier, or government official

*Anything of value includes cash, gifts, business courtesies (travel, meals, and entertainment), donations, sponsorships, or other items that could be valuable to the recipient.*

## Bribery

MiniMed does not offer or provide any form of bribe, illegal payment, or kickback. Items of value are not provided to improperly induce or reward a customer for prescribing, recommending, using, ordering, or purchasing a product or service. Payments are not made to gain an unfair advantage in the marketplace, including areas such as product approval, sales, research, permitting, hiring, or other business aspects. Third parties cannot be hired to perform actions that MiniMed itself is not permitted to do. Liability may arise under anti-corruption laws if an agent, distributor, or other third party acting on behalf of the Company makes an illegal payment to a government official, even if the Company was unaware but reasonably should have been aware of the conduct.

## Gifts for government officials

We are committed to upholding honest and transparent business practices and must refrain from any inappropriate efforts to influence government decision-makers. Providing illegal gifts to government officials or employees of government-owned enterprises is strictly prohibited. Standards for nominal gifts and entertainment may differ by country; therefore, before offering anything of value, please review local regulations and secure prior written approval from the appropriate country compliance officer. If there is any uncertainty regarding the permissibility of a gift, consult with the Legal or Compliance Department for guidance

### **Who are government officials**

*Government officials include federal, state, or local government employees, political candidates, and even employees of government-owned enterprises, such as nationally- or state-owned medical facilities. Government officials may include healthcare providers employed by governmental or state-run hospitals among others*

## Securities laws and insider trading

Many countries have established laws that prohibit trading securities on the basis of insider information. Insider information refers to material information that is not publicly available and could influence the investment decisions of a reasonable investor. Occasionally, employees may have access to significant, confidential information regarding the Company (such as unpublished business performance data) or its business partners. Trading securities based on this information or making recommendations or sharing such information with individuals outside the Company, is classified as insider tipping and is a violation of insider trading laws.

*For further information, refer to MiniMed's Insider Trading Policy.*

## International trade

As a global organization actively engaged in international trade, it is imperative that we comply with all applicable U.S. import and export laws and regulations, irrespective of our location of operations. Furthermore, we are required to understand and adhere to the legal frameworks governing imports and exports in each country where we conduct business, recognizing the complexity involved. Adherence to both local laws and internal Company policies remains essential at all times.



## Boycotts and sanctioned countries

U.S. law restricts cooperation with certain boycotts imposed by some countries against others, and mandates that any request to aid or support such boycotts must be reported to the U.S. government. Our organization does not engage in prohibited boycotts. Additionally, U.S. law prohibits trade with certain sanctioned countries. Should you receive a request to participate in a prohibited boycott or to conduct trade with a sanctioned country, promptly notify your manager or the Legal Department. For further inquiries regarding trade laws or Company policies, please contact your manager, import/export compliance officer, or Legal Department.

### **What is an import/export**

*What is an Import? Any tangible or intangible item that is brought into one country from another. What is an Export? Any tangible or intangible item that is sent from one country to another. This is true regardless of the item type (e.g., medical devices, software, and technical information) or method of transportation (e.g., mail, hand-carry, and downloaded from a website).*

## Government audits and investigations

We deal honestly and fairly with government authorities as our products are subject to regulation by government agencies worldwide. The Company maintains open and professional relationships with regulators regarding regulatory policy, submissions, compliance, and product performance.

All employees are responsible for ensuring compliance. Concerns about regulatory compliance should be reported promptly to a manager.

We cooperate and comply with valid government investigations and requests for information. We also cooperate with government officials who may inspect our facilities or investigate our activities. In all cases, we protect the legal rights of MiniMed and its employees.

## Routine audits and inspections

We have teams that regularly interact with government officials. Those teams should follow their standard processes.

For non-routine inquiries, contact your Legal & Compliance representative before submitting to any interviews, answering questions, producing documentation, or discussing compliance.

All documentation and communications with a government inquiry or other legal matter must be forwarded to the Legal & Compliance department immediately. This includes any notice of investigation, lawsuit, subpoena, or request for products or documents.

# VI. Our Relationship with Our World

We uphold our global responsibilities through strong citizenship, which means maintaining ethical business practices, ensuring product quality, promoting healthcare, respecting human rights, protecting the environment, following leading labor standards, supporting philanthropy, and encouraging volunteerism.

## Human rights and fair labor practices

Our objective is to maintain a constructive and beneficial presence within each community in which we operate. We are committed to upholding fundamental human rights by adhering to all relevant local labor regulations. Our Company, along with our vendors and suppliers, strictly prohibits the use of child or forced labor. We ensure compliance with all applicable wage and hour requirements.

*If you have any questions or concerns regarding our employment practices, please contact your manager, Human Resources representative or Legal Department.*

## Political Activity

Political engagement is one form of community involvement. Our Company supports public policy aligned with our Mission and may support candidates or interest groups when appropriate. Employees are encouraged to participate in politics personally but must not represent their activities as Company-endorsed. Any political solicitation during work hours or on Company property requires prior written approval from the CEO or General Counsel, and all actions must comply with legal requirements for corporate political contributions.



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