



Code of Conduct

INTRODUCTION TO THE CODE OF CONDUCT

Our Purpose

Every day, our products and services have a positive impact on the lives of millions of people. This is not only a great privilege, but also a great responsibility. Serving our patients and customers with integrity and achieving business results ethically is just as important as the results themselves. Passion for patient success, trust, and ethical behavior govern how we do business and how we interact with each other. As individuals and as teams, we are committed to creating a world without limits for people with diabetes.

Our Commitment

We are committed to:

- serving patients with diabetes and delivering value to our customers;
- acting responsibly in our relationships with governments, regulators, patients, customers and business partners
- maintaining a safe, healthy and supportive workplace for our colleagues;
- contributing as a socially responsible company to the communities in which we live and work; and
- creating value for our investors.

Performance with Integrity

This Code of Conduct defines the professional standards we expect of our colleagues and applies to all actions and activities of LifeScan

in the pursuit of a high level of business ethics, compliance with applicable laws and regulations, and social responsibility. Conducting ourselves with integrity is the right thing to do, and it also ensures we protect our reputation, credibility, the health of our business, and our ability to serve patients and their care teams.

I believe sustainable and compliant growth is in the best interest of LifeScan and its stakeholders. I see this Code of Conduct as a key element of our relationship with all colleagues and third parties. The leadership team insists on full compliance with this Code of Conduct. Any success we achieve is no success at all if not achieved ethically.

Thank you for all you do to uphold the values and culture of LifeScan.

Val Asbury
President & CEO

Who Owns and Manages LifeScan's Risk?

We all do. LifeScan's business risk is managed by every colleague in his or her daily work. Functions such as Quality, Finance, Legal, and Ethics and Compliance provide independent checks and controls.

Internal and external auditors provide a third layer of protection by performing periodic risk reviews. Accountability for ethical and compliant behavior rests with all of us.

Colleagues' Responsibilities

LifeScan colleagues and contractors working on behalf of LifeScan must: comply with the principles in this Code of Conduct and applicable laws, maintain the highest ethical and professional standards, and act with social and environmental responsibility. All colleagues must know and understand the Code of Conduct, our global policies and procedures, as well as relevant laws. Consult your manager, your Human Resources partner or the Legal Department if you are unclear about which laws and regulations apply to your activities or if you require further support and assistance.

Managers' Responsibilities

LifeScan managers are responsible for setting a good example, encouraging an environment of open and honest communication without fear of retaliation, and taking prompt action when ethical or compliance issues are brought to their attention. LifeScan managers must never direct colleagues to achieve results that violate LifeScan policies, this Code of Conduct, or the law.

OUR GUIDING PRINCIPLES

Put Patient Safety First

Patient Safety is Paramount

The patient is at the center of everything we do, and LifeScan is committed to developing and providing safe, reliable and high-quality products for patients. We are all collectively responsible for ensuring quality and safety, which includes the completeness, consistency, and accuracy of good manufacturing practices (GMP) data. All colleagues and contractors must comply with all applicable processes, procedures and policies designed to ensure the quality of our products. Any concerns must be promptly raised through appropriate channels. We take complaints and reported adverse events seriously and will promptly investigate them consistent with the laws and regulations of the countries in which we do business.

Conduct Business with Honesty and Integrity

Working with Healthcare Professionals

We do not promote our products for uses which have not been approved by a regulator. We are committed to ethical and transparent interactions with the healthcare professionals ("HCPs") with whom we work. We work with HCPs to support the effective use of our products and services to improve patient care, develop innovative products, and support research and education. In all HCP interactions we are aware of and comply with all applicable laws and regulations that govern interactions with HCPs in the countries in which we do business. We do not enter into business arrangements, offer or provide any improper inducement to an HCP to incentivize or reward the recommendation or use of our products.

Anti-Bribery and Anti-Corruption

We are committed to full compliance with all anti-bribery / anti-corruption laws everywhere we operate. This includes the prohibition of giving, offering, soliciting or receiving any payments, services, entertainment or favors to obtain an improper business advantage. We extend these practices required by law and our Code of Conduct to third party business partners.

Gifts and Entertainment

We take great care to ensure the giving or receiving gifts or entertainment does not create a conflict of interest or a violation of our Code of Conduct, policies, or applicable law. We create business opportunities fairly and avoid offering business courtesies as an improper inducement. Any types of exchanges with HCPs are prohibited unless authorized by our Healthcare Compliance group.

Political and Charitable Activities

Our support of charitable, educational, and philanthropic organizations or causes is never contingent on direct benefit to us. All charitable donations to an HCP or at the request of an HCP must follow our policies and gain appropriate approvals in advance, including from the Healthcare Compliance group. Political contributions on behalf of LifeScan are prohibited. Any lobbying or political influencing activity on behalf of LifeScan must be pre-approved by our General Counsel and Head of Communications. Where individuals engage in civic or political activities, those activities are entirely personal and do not represent LifeScan.

Fair Competition

We do not enter into agreements or business arrangements that are anti-competitive or that unfairly restrict trade. These types of agreements could violate fair competition laws in one or more of the countries in which we do business. We avoid inappropriately discussing sensitive, potentially anti-competitive topics with third-

parties. Sensitive topics include pricing, manufacturing capacities, sales, bids, profits or profit margins, costs, or methods of distribution. We also refrain from obtaining any information about competitors through improper or unethical means. We do not accept, disclose or use competitive information if there is reason to believe it was disclosed to us in breach of a confidentiality.

Global Trade / Export Control

We support international efforts to prevent trade in technology, substances, and materials that can be misused for war, for the manufacture of illicit drugs or for other internationally prohibited activities. We will adhere to all applicable trade sanctions and export control regulations.

Treat Each Other Fairly; Care for the Environment

Fair and Safe Workplace

We are committed to maintaining a safe, secure, healthy, drug-free workplace. We embrace diversity in our fellow colleagues. We do not tolerate harassment, bullying or discrimination in our workspace or in hiring decisions. We comply with wage and working hours laws in every locality in which our colleagues are located. We will not engage in or support child labor, human trafficking, slavery, or bonded or forced labor of any kind in the research, manufacture, sale and distribution of our products.

Environmental, Health and Safety Practices

We have an excellent track record in Environmental Health & Safety (EHS) performance and have received several industry awards and accreditations in these areas. We are committed to operations and practices that prevent harm or damages to people, the environment, or property. We all share responsibility for maintaining a workplace free from injury and environmental incidents. You should report all EHS incidents, near-misses, and hazards to your manager, take action

to correct unsafe practices or conditions, and seek to continuously improve our EHS performance.

Act in the Best Interests of LifeScan

Conflicts of Interest

We seek to be actively alert to any potential influences that may affect our duties to LifeScan, and seek to avoid situations where personal interests conflict, or appear to conflict, with those of LifeScan. We avoid significant personal investments in a customer, supplier or competitor, as well as working in any capacity for a competitor, supplier or customer, or otherwise moonlight where it conflicts or creates an appearance of a conflict. We avoid direct supervision or influence on the job evaluation, pay or benefits of any family member or anyone with whom we have a similarly close relationship. We avoid negotiating or overseeing a LifeScan business transaction with such persons.

Accurate Recordkeeping

Accurate records are crucial to our company's ability to comply with the law and for us to truthfully reflect our financial health, both internally and externally. We must ensure that all records contain accurate and complete information that reflects the truth of the underlying transactions or events. No one should sign, approve or transmit a record, or permit another to sign, approve or transmit a record on behalf of LifeScan, if he or she knows or has reason to believe the record is false. We expect all colleagues to report any unrecorded funds or assets or false or artificial entries in books and records.

Travel & Entertainment

We expect LifeScan colleagues to spend our company's money wisely. Our procurement policy and travel and entertainment policy provide processes and limitations for spending the company's

money. We expect colleagues to comply with these policies and to submit all business expenses via approved programs and accurately categorize expenses.

Discussing LifeScan Business: Social Media

Only authorized persons may speak on behalf of LifeScan. When people outside our company ask us questions about the business, they should be directed to LifeScan's Communications Department.

Social media offers our company new opportunities for communication when used properly. We expect our colleagues to follow the same standards of professional conduct online as they would in the workplace, and to not disclose any confidential or proprietary information of LifeScan through social media.

Protect LifeScan Assets and Information

Company Property

We all contribute to the protection of LifeScan's property, assets and confidential or proprietary information from theft, loss, misuse and waste. This includes our office equipment, facilities and funds, as well as LifeScan's proprietary information and data. LifeScan colleagues may not disclose our confidential or sensitive information other than for legitimate business purposes and with the appropriate safeguards.

Security: Authorized Use of IT Systems

We protect computers and devices and all information systems from attacks by complying with our privacy and security policies and notifying our Information Technology Department for any potentially compromising events. We limit our use of LifeScan computers, mobile devices and communications equipment for legitimate LifeScan business and for infrequent personal matters that need to be attended to while we are at work.

Data Privacy

We are committed to respecting and protecting the confidentiality and privacy of our colleagues, business partners, customers and patients. We know and understand the rules and standards regarding the collection, use and maintenance of personal data, including patient health information. We take all necessary steps to protect personal data by having effective systems and safeguards in place to make sure it is secure, and so that the personal data can be destroyed once there is no longer a business need.

WORKING WITH THE CODE

Open Door and Non-Retaliation

The foundation of our commitment to performing with integrity is open communication and transparency throughout our organization. Our Open Door and Non-Retaliation Policy encourages colleagues to speak up when they have questions or concerns about any subject. While we encourage issues to be resolved locally with coworkers and managers, we recognize that certain concerns or questions may be shared more appropriately through other channels. LifeScan's Open Door Policy allows you to report any concern or question to your manager, any member of the LifeScan Global Leadership Team, your local HR partner or any member of the Legal or Compliance and Ethics teams.

In addition to the Open Door Policy we provide several confidential ways for colleagues to report concerns or to raise questions.

Email

Contact the Ethics and Compliance team:
LifeScanCompliance@lifescan.com

Online or Phone

An Ethics and Compliance website has been established at: www.lifescan.ethicspoint.com for colleagues to report concerns about potential breaches of this Code of Conduct. In the UK and US, colleagues can also call a hotline: United States toll free number: 1-844-611-4138; United Kingdom freephone number: 0808-234-1339. Where permitted by law, there is an option to remain anonymous when utilizing the Ethics and Compliance reporting tools.

Anyone who, in good faith, raises a concern about a possible ethics or compliance breach will be supported by LifeScan management and will not be subject to any retaliation. We have a strict non-retaliation policy. Any act or threat of retaliation will be considered a violation of this Code of Conduct.

Enforcement

Violations of the laws and policies in our Code of Conduct may result in civil and criminal penalties for LifeScan and its colleagues. Other consequences may include loss of business, loss of faith and confidence in LifeScan, damage to our reputation (and the reputation of colleagues), and increased risk of safety and environmental hazards.

We will investigate any suspected failure to comply with this Code of Conduct, its supporting policies, or the laws and regulations governing our company. Colleagues must fully cooperate in all such investigations. We reserve the right to take appropriate corrective action in response to any violations, which may include suspension or termination of employment.