



Bio-Rad Interactive Code of Business Ethics and Conduct

(The entire text of the online version of the Bio-Rad Interactive Code of Business Ethics and Conduct "iCode")

OUR MISSION:

We advance science and save lives, together.

Dear Colleague,

Bio-Rad has a long history of providing high-quality products and services that advance scientific discovery and improve healthcare. Through the years, the company's success has been guided by our commitment to integrity in everything we do. That means conducting ourselves in a professional and ethical manner and complying with applicable laws and regulations worldwide.

The revised and interactive "Code of Business Ethics and Conduct" addresses new laws, rules, regulations, and standards of conduct. It also includes references to policies and procedures that are necessary to ensure the high ethical standards in which we conduct our business.

I hope you will find the Code to be a practical and user-friendly resource. For each subject covered, you will find helpful definitions and important concepts, along with key expectations and related materials including videos that all work together to help you gain a greater understanding of the topic and its importance to you and to Bio-Rad.

The Code applies to employees, officers, and directors at Bio-Rad as well as its subsidiaries worldwide. Where appropriate, these policies may also extend to contractors and other third parties who may represent Bio-Rad.

Please take the time to carefully review this Code to better understand how the related policies and procedures apply to you on a daily basis. If you have any questions or concerns, please discuss them with your supervisor or manager. You may also discuss any questions you have about the Code with Human Resources, Legal, or Corporate Compliance.

(continued)

No matter what your role is at Bio-Rad, every one of us plays a vital part in upholding Bio-Rad's long-standing reputation for integrity and quality.

I expect everyone to abide by this Code and continue to operate with the highest integrity to ensure the continued success of Bio-Rad.

Thank you,



Norman Schwartz
President and Chief Executive Officer Bio-Rad Laboratories, Inc.

OUR FOUNDATION

The Bio-Rad Family of Codes

The family of Bio-Rad Codes of Conduct includes three codes that govern our conduct and the conduct of our business partners. The three codes in the Bio-Rad family of codes are summarized below.

1. **Bio-Rad Interactive Code of Business Ethics and Conduct** applies to all Bio-Rad workforce members. Workforce members include the Board of Directors, full- and part-time employees, and temporary and leased workers. This Code serves as a guide to help us make honest and ethical business choices. It is intended to help us comply with applicable laws, rules, and regulations and Bio-Rad's policies. The Code cannot address every possible situation that might arise in our day-to-day performance of job duties, nor does it address every law or Bio-Rad policy. This Code, however, demonstrates our values and provides guidelines and resources to help us do the right thing and act with integrity in all that we do. Bio-Rad is committed to an organizational culture that encourages ethical conduct and a commitment to compliance with laws.
2. **Channel Partner and Consultant Code of Conduct** applies to business partners who (i) act on Bio-Rad's behalf, and (ii) interact with government or government officials, healthcare professionals and healthcare organizations, or customers. This Code is more extensive than the Supplier Code of Conduct due to the additional obligations that these organizations have as a result of acting on behalf of Bio-Rad.
3. **Supplier Code of Conduct** applies to all other entities that provide services or products to Bio-Rad.

Our Values

Our values guide and support us on our path. They daily remind how we act, how we make decisions that make a difference. They guide our organization and its culture. Bio-Rad's values are:

Focused

We put customer success and strategy at the center of what we do

- Always consider the customer.
- Employ critical thinking.
- Utilize a process and data-driven mindset.
- Be led by Strategy.

Accountable

We honor commitments to customers, colleagues, and ourselves

- Commit to exceptional performance.
- Act ethically, with integrity.
- Deliver on commitments.
- Own the outcome.

Sustainable

We are building a company that will stand the test of time

- Remain a self-standing company.
- Continuously improve and innovate.
- Keep agile and adaptive.
- Pursue sustainable policies and practices.

Together

We respect one another as individuals, and we win together as a team

- Foster team alignment.
- Empower yourself and others.
- Value communication and transparency.
- Be inclusive.

OUR SPEAK UP CULTURE

- **Asking Questions and Raising Concerns**
- **Compliance with the Law**
- **Cooperation with Investigations**
- **Higher Expectations for Supervisors and Managers**
- **No Retaliation**
- **Violations of this Code**

Asking Questions and Raising Concerns

We speak up when we have questions or concerns. Our culture of integrity fosters trust with customers, employees, and stakeholders. Speaking up protects us all, and it protects Bio-Rad. Every concern is important and all questions are fair questions.

We are involved in and committed to our collective mission and equally committed to achieving our goals with integrity. We show this dedication by speaking up when we have suspicions, questions, or concerns about conduct we have seen. Speaking up is also how we can resolve issues and improve our processes at Bio-Rad.

Don't be afraid to speak up. Every concern is important, and all questions are fair questions. There are many resources you can use to ask questions and report concerns at Bio-Rad. They include:

- Your immediate supervisor or another manager
- Your local Bio-Rad Human Resources representative
- Bio-Rad Corporate Compliance
- Bio-Rad Legal
- Our Integrity Helpline at www.Bio-RadIntegrityHelpline.com
- The Bio-Rad Audit Committee of the Board of Directors. You may contact the Audit Committee directly regarding any concerns relating to an accounting, internal accounting controls, or auditing matter. Contact the Audit Committee by mail at:

Bio-Rad Laboratories, Inc.

Attn: Audit Committee, Mail Stop: 1-116

2000 Alfred Nobel Dr., Hercules, CA 94547, USA

(or by email) at audit_committee@bio-rad.com

We speak up in "good faith," which means that we only report information that we believe to be true. We do not need to be right about our suspicions, but we do not knowingly make false reports.

What Should I Report?

Provide as much information as you can, including details that will help Bio-Rad investigate.

Can I Report Anonymously?

If you do not wish to identify yourself, you can report anonymously on our Integrity Helpline at www.Bio-RadIntegrityHelpline.com where allowed by law.

What Happens After I Report?

Bio-Rad will keep information you report as confidential as possible. The company takes all reports seriously and will investigate promptly. Bio-Rad also takes appropriate disciplinary and corrective action once a report is substantiated. Reporters are notified when an investigation is complete.

Expectations:

- When we have questions or concerns, we come forward. Every concern is important, and any question is a fair question. We aren't afraid to speak up.
- We have many different resources we can use to speak up, including relaying concerns to our supervisor or another manager, our local Bio-Rad HR representative, Corporate Compliance, or Legal, or contacting our Integrity Helpline at www.Bio-RadIntegrityHelpline.com
- We nurture the Bio-Rad speak-up culture by encouraging others to ask questions. Our speak-up culture of integrity fosters trust with customers, employees, and stakeholders. It protects us all, and it protects Bio-Rad.

Where to Get Help:

- Your immediate supervisor or another manager
- Your Bio-Rad local Human Resources representative
- Bio-Rad Corporate Compliance
- Bio-Rad Legal
- The Integrity Helpline at www.Bio-RadIntegrityHelpline.com
- The Audit Committee of the Board of Directors, which may be contacted regarding accounting, internal accounting controls, or other auditing matters.

Compliance with the Law

We must be aware of and comply with the laws that apply to our role at Bio-Rad and ask questions when we are not sure which laws are relevant.

Many laws apply to Bio-Rad's business. Laws and regulations in several different countries and states, covering many different topics, can have a significant impact on our operations, but we must understand and follow them.

In cases where it is difficult to determine which laws or regulations apply, or whenever we have questions about how a law or regulation applies to our work, we take the time to seek advice from Bio-Rad Legal or Bio-Rad Corporate Compliance. In some jurisdictions, our Code or our policies may vary from a local law or regulation. In those cases, we follow the stricter application and, as always, seek advice from Bio-Rad Legal or Bio-Rad Corporate Compliance.

If you perceive a conflict between this Code and local law, you should:

- First, get advice. Laws are complex. You can reach out to Bio-Rad Legal or Bio-Rad Corporate Compliance for help.
- Comply with this Code if the conflict is between our Code and local custom.
- Follow the more restrictive policies if your business unit or location has policies that are stricter than this Code.
- Follow local law if it is more restrictive than our policy or our Code.

Expectations:

- We get advice when we are unsure of what law might apply.
- When standards conflict, we follow the more restrictive standard, whether it's our Code or policy or the applicable law. When in doubt, ask.
- In all locations where we do business, we conduct business ethically, use good judgment, and avoid conduct that could compromise, or appear to compromise, our integrity.

Cooperation with Investigations

We should fully cooperate with any Bio-Rad investigation and provide all information requested.

In upholding our commitment to transparency and integrity, we fully cooperate with all Bio-Rad investigations and inquiries by providing all information and answers requested.

Generally conducted by either Bio-Rad Corporate Compliance or Human Resources, compliance investigations at Bio-Rad are consistent, fair, and prompt. Bio-Rad workforce members should neither "investigate" matters on their own nor try to "assist" an investigation team informally.

In investigating reports that are brought forward with adequate evidence, Bio-Rad expects the information prompting the report to be accurate. We should never report false concerns or make misleading statements.

Bio-Rad takes potential misconduct seriously and will investigate reports that are made in good faith. It is important for Bio-Rad workforce members to speak up and cooperate with investigations. Bio-Rad cannot address or correct issues unless we know about them.

Government agencies and other third parties may also request information from or about Bio-Rad. If an outside party contacts you in an investigation, be courteous and respectful, but forward any requests to Bio-Rad Legal immediately. If you have any questions, you can also contact the Integrity Helpline at www.Bio-RadIntegrityHelpline.com.

Expectations:

- We cooperate fully with all Bio-Rad investigations.
- We do not conduct our own investigations “on the side.”
- We do not interfere with investigations or retaliate against anyone cooperating with an investigation.
- We contact Bio-Rad Legal if we receive a request for information from a government agency or another third party in the context of an investigation.

Higher Expectations for Supervisors and Managers

Supervisors and managers lead by example and must help shape and maintain our compliance and ethics program at Bio-Rad.

We make the right decisions – at the right time. Our leadership, including all supervisors and managers, must know their role in maintaining a successful compliance and ethics program and must always be willing to be an ambassador for the principles in our Code.

Supervisors and managers:

- Lead by example.
- Promote ethical behavior.
- Create and maintain a positive work environment.
- Encourage employees to ask questions and report concerns.

Supervisors and managers should be knowledgeable about our Code and policies as well as all relevant portions of the Bio-Rad Management Guidelines.

Supervisors and managers must maintain the kind of communication with workforce members that encourages them to come forward when they have concerns. Supervisors and managers should also regularly discuss compliance and ethics issues with their workforce members.

Supervisors and managers must make timely reports of any Code or policy violations as well as any unethical or illegal conduct they are aware of or that has been reported to them.

Expectations:

- Supervisors and managers lead by example and are held to higher expectations of ethical conduct.
- Supervisors and managers create a work environment where team members feel safe to raise concern and questions.
- Supervisors and managers encourage reporting.

No Retaliation

Bio-Rad does not tolerate any form of retaliation for reporting concerns in good faith.

We expect everyone to get involved and speak up upon seeing or suspecting a violation of our Code, our policies, or the law. Bio-Rad protects those who do so by not tolerating any form of retaliation when a member of our workforce reports a concern in good faith or participates in an investigation.

If you experience retaliation, or you are aware of someone else being subject to retaliation, you should speak up and report your concerns to Bio-Rad Human Resources immediately.

Anyone engaging in retaliation against a Bio-Rad employee who makes a good faith report or participates in an investigation may face discipline.

Expectations:

- We understand that Bio-Rad does not tolerate retaliation against those who make good faith reports.
- We understand both “soft” and “hard” retaliation and refuse to participate in either type.
- We acknowledge that those who engage in retaliation may face discipline, up to and including termination.
- We make a report if we see retaliation against those who make good faith reports.

Violations of this Code

Alleged violations of our Code and policies are thoroughly investigated and can have serious consequences, including financial or reputational penalties, and discipline, including termination. Part of your job and ethical responsibility is to help enforce this Code. You should be alert to possible violations and promptly report violations or suspected violations.

You must familiarize yourself with our Code and understand that a violation of the Code could include both taking a wrong action (intentional or not), as well as NOT taking a required action. Both types of conduct could create legal, financial, and reputational problems for you and the organization.

Not every violation of the Code is as clear cut as fraud or bribery. And as our business grows ever more fast-paced and complicated, it can become harder to identify the right actions and make good decisions. This is why we must ask questions and report any concerns we might have.

You can trust that violations of the Code will be addressed. If necessary, an investigation will be conducted by trained personnel using the Bio-Rad investigation process. The investigation process at Bio-Rad is consistent, fair, and prompt. We should fully cooperate with any Bio-Rad investigation and provide all information requested. Investigations are conducted by either Bio-Rad Corporate Compliance or HR, with support from Bio-Rad Legal and other experts as appropriate. You should not investigate matters yourself.

Expectations:

- We follow the law, our Code, and our policies.
- We cooperate when asked to support investigations into alleged violations of our Code or our policies.
- We understand that retaliation for reporting violations of our Code or our policies will not be tolerated.

MAINTAINING INTEGRITY FOR OUR COMPANY AND OUR STOCKHOLDERS

- Avoiding Insider Trading
- Charitable Contributions and Community Impact
- Data Privacy
- Internal Controls
- Political Activities
- Information Security

- Protecting Intellectual Property
- Preventing Money Laundering
- Protecting the Environment
- Records and Information Management
- External Communication

Avoiding Insider Trading

We do not use material, non-public information that we have learned at Bio-Rad to trade stock or provide tips to others.

We conduct our business with integrity. Bio-Rad and our business partners trust us with valuable information and expect us to keep it safe. Some information we learn in our role at Bio-Rad may be material, non-public information that could be used to influence a decision to buy or sell securities, such as stocks, bonds, or options.

We must never use material, non-public information for any trading activity involving Bio-Rad stock or any other company's securities, nor should we ever provide such information to, or engage in "tipping" another person. The penalties for trading on material, non-public information or tipping others can be severe and include both civil and criminal consequences.

Expectations:

- Keep all material, non-public information safe and never engage in tipping.
- Never trade any securities, whether of Bio-Rad or any other organization, based on your knowledge of material, non-public information.
- Ask questions before you engage in any trading, and make sure you are complying with our rules and the law.

Charitable Contributions and Community Impact

Bio-Rad encourages us to support our communities, and any charitable contributions must be consistent with company policy.

As a champion of community involvement, Bio-Rad is committed to our customers and to promoting science, so we do what we can to make a positive difference. One way we show that commitment is through our participation in charitable activities, both as a company and as individuals.

Participation in any Bio-Rad-sponsored charitable activities is always voluntary and any commitment of Bio-Rad funds or assets to a charitable activity is governed by our approval process and our policies. Company contributions also must comply with all applicable laws and cannot be made, or appear to be made, for the purpose of improperly influencing any business partner or government official.

Any volunteer activity or use of Bio-Rad resources or facilities for charitable functions must also follow our guidelines and receive proper approval. If you have questions about our policies regarding charitable activities, please consult the resources listed in this section.

Sponsorship and the use of Bio-Rad's name may be approved for activities Bio-Rad deems appropriate, such as the formation of a company team. Bio-Rad, however, will not sponsor religious, political, or athletic organizations, organizations outside the immediate geographic area, or organizations that discriminate on any basis.

Expectations:

- Bio-Rad encourages us to participate in our community, but we must observe our policies and applicable law when doing so.
- We seek management approval, follow all our applicable policies, and use the Bio-Rad Business Courtesies Portal before committing to any charitable giving on Bio-Rad's behalf.

Data Privacy

We comply with the law, our policies, our privacy principles, and other data privacy requirements in handling, processing, and protecting all personal data.

We develop new ideas and strive to be innovative, but we are also careful with our data and with any data that is entrusted to us by our business partners, customers, and other third parties.

This includes any U.S. term referring to any data, including, but not limited to, name, U.S. Social Security number, date of birth, place of birth, or family information, that could identify a specific individual; or other information that is linked to an individual, such as medical information, financial information, or employment information regarding Bio-Rad workforce members, customers, vendors, business partners, and suppliers. We must comply with the international laws that govern our regular collection, handling, storage, use, and disclosure of sensitive information.

We have privacy principles that guide us when we are working with personal data:

- We follow all applicable local law requirements for handling personal data.
- We provide all relevant parties with clear legal notice describing how personal data will be collected, used, accessed, disclosed, and protected.
- We obtain workforce members' consent to collect, use, or disclose their personal data.
- We provide reasonable access to personal data to individuals who can correct, amend, or delete personal data.
- We protect personal data using our information security resources.
- We take reasonable steps to ensure that the personal data we handle is relevant, accurate, and complete.
- We lawfully collect and use personal data, and we do not share it without authorization.
- We transfer personal data consistent with all applicable laws and our policies and procedures and only transfer to third parties when adequate data security and data privacy mechanisms are in place.
- We monitor and periodically evaluate our controls related to privacy and data protection.
- We comply with the law regarding breach notification and notify all appropriate parties in a timely manner.

Expectations:

- We are aware of data privacy considerations, and when we have questions, we ask for help via the Bio-Rad Data Privacy Office email box at dataprivacy@bio-rad.com.
- We are careful when we collect, use, store, or transfer any personal data to make sure that we comply with all of Bio-Rad's policies and any laws applying to handling sensitive information.
- We do not share personal data with any other party unless we have complied with all of Bio-Rad's policies and procedures regarding proper data transfer.

Internal Controls:

We follow all internal controls that apply to our role at Bio-Rad.

At Bio-Rad, we have a system of policies and procedures that help provide assurance of the accuracy of any financial reporting, compliance with the law, and the overall effectiveness and efficiency of our operations.

These are our internal controls. While our finance and internal audit teams have leadership and oversight authority over our controls, we all work with controls, such as our policies and procedures, every day and must make sure we follow them. We must also keep accurate and

complete records since record keeping is the foundation of any successful internal control system.

Everyone must accurately and fully follow the internal controls and all the policies and procedures that apply to his or her role at Bio-Rad. If you have any questions about what internal controls might apply to your role at Bio-Rad, you should ask your manager.

Expectations:

- We familiarize ourselves with the internal controls that apply to our role at Bio-Rad.
- We report any concerns we have regarding Bio-Rad's internal controls to our Quality Assurance team, or, in the case of a finance-related control, the Controls Compliance team.

Political Activities

We participate responsibly in the political process.

While we are all encouraged to get involved and make a difference in the issues that matter to them, when participating in the political process, we must make sure to do so only on our personal time and using only our personal resources.

We must also make sure that there is never any confusion about Bio-Rad supporting or participating in any political cause, candidate, or concern. We never suggest that we speak for Bio-Rad, nor do we make political donations or contributions using Bio-Rad's name. We also do not use the company's time, funds, or other resources to advance or support any political cause or candidate.

Expectations:

- We support political causes and candidates only in our capacity as private citizens and never speak for Bio-Rad or suggest the company supports or opposes any cause.
- We do not use Bio-Rad resources for personal political activities.

Information Security

We have a responsibility to safeguard Bio-Rad and third-party data in a manner consistent with our Code, our policies, and the law.

We can only innovate and experiment with new ideas and products if our information and data are at hand and secure. Therefore, we are all committed to keeping the data and information we use, access, collect, process, and store safely and properly secured. Bio-Rad has developed policies and procedures to make sure we keep this commitment, so we must learn the procedures that apply to our role. Some common steps we all should take include:

- Use or access data only when there is a business purpose for its use.
- Keep user IDs, passwords, and other security measures confidential.
- Make sure we are familiar with all of the information security procedures that apply to our role.
- When not working on the Bio-Rad network, make certain we follow all of Bio-Rad's procedures for remote access and data protection.
- Never install software to Bio-Rad electronic devices unless specifically authorized to do so.
- Never download files or data to electronic devices unless authorized to do so.
- Contact Bio-Rad's Chief Privacy Officer, Chief Compliance Officer, or Corporate Compliance if we believe a security breach may have occurred, or if we have any questions about our Information Security Program.

Expectations:

- We must make sure we are familiar with and follow all of the information security and data protection procedures that apply to our role at Bio-Rad.
- When we are on the job – whether it's at a Bio-Rad office, a local coffee shop, a healthcare provider, an academic institution, or a government agency – Bio-Rad's online safety and security are a responsibility we all share.
- Be vigilant and watch for possible security threats such as phishing emails. Remember, if you receive a suspicious email, never open any attachments, delete the email, and contact the Bio-Rad IT Service Desk.
- We speak up, ask questions, and report any concerns we might have about suspicious activity or potential information or data breaches.

Protecting Intellectual Property

A key part of Bio-Rad's continuing success is the intellectual property, or "IP," created and controlled by Bio-Rad and its employees. The protection of this intellectual property is important in ensuring that Bio-Rad is able to compete effectively in the marketplace and offer our customers the tools they need to advance discovery and improve lives.

Bio-Rad is always seeking innovative ways to solve challenges, and a key tool we use in this endeavor is our intellectual property (IP). Bio-Rad's valuable intellectual property includes:

- Patents
- Trademarks and logos
- Copyrights
- Trade secrets
- Know-how
- Publications
- Software
- Other developed IP

We all must keep Bio-Rad's IP safe, use it responsibly, and follow any guidance about sharing it. Our vendors and other third parties should not use Bio-Rad's logo or other IP without our express written permission.

While we are encouraged to help develop new tools and resources to reach our mutual goals of advancing discovery and improving lives, we must remember that ideas and inventions that we create in connection with our employment at Bio-Rad belong to Bio-Rad.

Expectations:

- Assist with the identification and registration of intellectual property that is eligible to be protected through the patent process.
- Keep confidential Bio-Rad's trade secrets and other confidential business information, including customer lists and account information.

Preventing Money Laundering

We look for red flags that may signal money-laundering activities when we are conducting transactions with our customers and business partners.

We conduct our business only with customers and business partners who engage in legitimate business activity. We operate our business with integrity, and we expect all of our customers and business partners to act the same way. We must take care and watch for signs that a customer or business partner is engaged in money-laundering activity. Signs to watch out for include:

- Providing vague or fictitious information
- Asking for an unusual transaction that has no business purpose

- Requesting oddly structured transactions or changes in transaction pattern or payment instructions
- Changing the terms of the agreement or payment at the last minute

Many countries, including the United States, prohibit conduct that might conceal or attempt to conceal the proceeds from criminal activities. We comply with all applicable laws and regulations where we do business.

Expectations:

- We must report any odd transactions or suspicious requests from our customers or business partners.
- We perform our due diligence and make sure we know the customers and partners with whom we conduct business.
- If we observe suspicious activity, we must contact the Bio-Rad Corporate Treasury or our Integrity Helpline at www.Bio-RadIntegrityHelpline.com

Protecting the Environment

We serve humanity and act as good stewards of our environment.

We seek to be involved in a positive way with our shared environment. This means that not only do we follow all applicable legal and regulatory requirements, as well as internationally accepted environmental standards, but we strive to be environmentally responsible in the management of all of our operations.

We are efficient and innovative in our product design, our operations, and the management of our facilities and resources. We work to reduce or eliminate hazardous wastes and emissions from our manufacturing processes, and we handle all waste safely, responsibly, and in compliance with all applicable laws and regulations.

Expectations:

- We seek ways to reduce and eliminate waste in our operations.
- We handle hazardous waste responsibly.
- We follow all applicable environmental laws and regulations.

Records and Information Management

Accurate information is key to our success. We must create and maintain records that are complete and wholly correct.

Each of us must do our part to ensure that Bio-Rad's information is accurate and complete. We make decisions every day based on information recorded at every level of our operations. Incomplete or inaccurate information may lead to poor decisions or negative consequences. The records we create as part of our daily responsibilities also have a significant impact on the financial information Bio-Rad discloses to the public. Therefore, we must be sure that the records we create, including time cards, expense reports, inventory reports, research test results, production and quality data, and any other corporate information, are true, fair, and accurate.

To meet these obligations, Bio-Rad has adopted policies and procedures concerning record retention and the types of documents we are required to maintain. We have established retention schedules for each type of record, and we have specified circumstances when it is necessary to maintain or segregate certain records.

If Bio-Rad Legal or your manager notifies you that documents or electronic files in your possession are subject to a "legal hold" or are needed for an investigation, you must follow directions and preserve those documents. Under no circumstances should you destroy, conceal, or alter them in any way.

Expectations:

- Review the Records Management Policy & Procedures Manual
- Review the information you are keeping:
 - Desktop files
 - Files in file cabinets
 - Electronic files
 - Records sent off-site
 - E-mail
- Ask yourself: "What do I have and why am I keeping it?"
- For Official Records, apply the Record Management concepts and practices detailed in the training.
- Contact the Bio-Rad Global Records Management Lead with any questions.
- Make sure that Bio-Rad records are recorded promptly, accurately, and completely.
- Report any issues with Bio-Rad's records, including any false entries, inaccurate information, or missing information.
- Cooperate with any internal or external investigation and follow any legal hold orders.

External Communications

We are committed to maintaining trust with our external audiences by ensuring information provided by Bio-Rad is accurate, clear, consistent, and authorized to share.

Workforce members are responsible for adhering to the company's policies regarding external communications that offer guidance on the different communications channels that are available that include the media, social media, other online publications, public speaking engagements, and others. Workforce members may not discuss or share "company inside information" or "material" information publicly.

Only authorized spokespersons at Bio-Rad may speak to the media or to the investment community on Bio-Rad's behalf. All inquiries from the media, analysts, or investors must be forwarded to Bio-Rad Corporate Communications.

Expectations:

- We are committed to ensuring that information provided by Bio-Rad is accurate, clear, consistent, and authorized to share.
- Workforce members must adhere to the company's external communications policies.
- We direct outside inquiries from the media, analysts, or investors to Bio-Rad Corporate Communications.

MAINTAINING INTEGRITY IN THE WORKPLACE

- We foster an Inclusive and Positive Work Environment
- Leaders engage their teams in conversations about Acting with Integrity

We Foster an Inclusive and Positive Work Environment

Integrity in the workplace begins with respect for each other.

We must all work to build and maintain a respectful work environment that allows us to reach our goals and perform our duties with dignity and support.

We cannot accomplish our mission without doing so as a diverse team. Our differences are an advantage, and we are committed to being an equal opportunity employer.

We never discriminate or harass anyone on the basis of any characteristic such as:

- Race
- Color
- Creed
- Sex (including gender information, gender identity, gender expression, pregnancy, or childbirth or related conditions)
- Sexual orientation
- Religion
- Marital status
- Age
- National origin
- Citizenship status
- Physical or mental disability
- Medical condition
- Veteran status
- Genetic information
- Any other protected characteristic

Harassing behavior, including verbal or physical harassment, can include behavior such as telling offensive jokes or using slurs, epithets, ridicule, mockery, insults, put-downs or name-calling; threatening or committing acts of intimidation or physical assault; displaying offensive objects or pictures; and interfering with work performance. Harassment, bullying, offensive remarks, or unwanted advances, will not be tolerated and should be immediately reported to your manager or Human Resources. Also, please immediately report any threats, intimidating behavior, or acts of violence.

We maintain a professional, safe, and productive work environment where employees treat each other and the public courteously at all times.

We follow all safety and security policies and always:

- Wear protective clothing and equipment
- Handle, store, use, and dispose of hazardous materials properly
- Operate machinery and equipment safely
- Bio-Rad maintains a drug-free workplace (Policy 401). We also require a workplace that is free of threats, intimidating behavior, acts of violence and weapons (Policy 106).

Expectations:

- We strive to build and maintain a respectful workplace.

- We report concerns about harassment, discrimination, or safety immediately, whether the behavior is directed at us or at another person.
- We value a diverse team and seek to celebrate our differences.

Leaders Engage Their Teams in Conversations About Acting with Integrity

Bio-Rad leaders model ethical behavior and emphasize the importance of compliance and integrity to our workforce members. In communicating regularly with the workforce, our leaders reinforce the importance of integrity and the necessity of speaking up to ask questions and report concerns.

Leaders must cultivate a workplace where compliance risks and common ethical dilemmas can be discussed openly and workforce members' questions and concerns are addressed and given appropriate respect.

Leaders must actively discuss integrity, ethical decision-making, and specific compliance scenarios with workforce members, making it clear that ethical decision-making is not negotiable. Our workforce members should never allow commercial business pressure to guide their actions in a manner contrary to our Values, our Code, our policies, or the law.

Workforce members look to leaders for direction, which means that Bio-Rad's leaders must always act ethically and in line with our Values, our Code, our policies, and the law and must insist on the same ethical conduct from the workforce members they oversee. Our leaders must focus on developing workforce members who:

- Follow our Values, our Code, our policies, and the law
- Seek guidance with questions or concerns
- Promote a culture of integrity
- Are accountable for their decisions and conduct
- Consider their reputation and Bio-Rad's reputation when making decisions

Leaders must also help workforce members determine how to negotiate complex situations by asking some simple questions:

- Does my action or decision violate our Values, our Code, our policies, or the law?
- Would I be embarrassed if others knew about my action or decision?
- Would my action or decision harm my or Bio-Rad's reputation?

Expectations:

- Leaders lead by example, always acting ethically and in line with our values, our Code, our policies, and the law.

- Leaders engage workforce members in constructive and frequent discussions about the risks we face at Bio-Rad.
- Leaders encourage and support workforce members asking questions and reporting concerns.
- Leaders frequently discuss ethical dilemmas and how to make ethical decisions with workforce members.

MAINTAINING INTEGRITY WITH OUR CUSTOMERS AND BUSINESS PARTNERS

- Anti-Corruption Compliance
- Assuring Product Quality and Safety
- Avoiding Conflicts of Interest
- Competing Fairly and Following Competition/Anti-Trust Laws
- Complying with Trade Controls and Sanctions
- Gifts and Entertainment
- Interacting with Healthcare Professionals and Healthcare Organizations
- Purchasing and Supplier Relations
- Regulatory and Clinical Standards Compliance

Anti-Corruption Compliance

We do not bribe or engage in any corrupt activity.

We always exhibit integrity in dealing with customers and business partners. We know that there are many international anti-corruption laws, some carrying significant penalties, that apply to our interactions with government officials anywhere in the world, including U.S. federal and state officials, and with commercial business partners, including suppliers.

Simply put, we do not bribe nor do we ever solicit or accept bribes. This includes small payments that some government agents may request to expedite or facilitate routine government actions such as issuing permits. These small payments are often called “facilitating payments” or “grease payments,” and we do not make them.

We are careful to ensure that no third party offers a bribe or attempts to bribe another on Bio-Rad’s behalf, as we could be held responsible for that third party’s conduct. It is for this reason that we do not hire business partners to undertake actions that we would not do ourselves, and we make sure our business partners are qualified and that they strictly adhere to the law and our policies.

It is important that we do not misrepresent any payments in our books and records. If you are aware of payments – including facilitating payments – that may be mischaracterized in our records, immediately contact Bio-Rad Corporate Compliance.

A bribe includes anything of value given with the intent of improperly influencing the decision-making of another in order to gain or retain business. Bribes can be in cash, goods, products, free services, or gifts.

Expectations:

- We neither make nor accept bribes.
- We do not make facilitating payments.
- We carefully select our business partners and any third parties acting on our behalf, and we monitor their behavior moving forward.

Assuring Product Quality and Safety

Our goal is to make a difference in the world with safe, effective, high-quality products for use in life science research and healthcare.

While we continually seek to make improvements, exceed expectations, and try new ideas, with our products, we never do so at the risk of quality and safety. We comply with the regulations and standards that govern the design, development, production, labeling, promotion, and distribution of our products.

All of us involved in the full product lifecycle are responsible for knowing and following the product quality and safety requirements related to our role. This means that not only do we follow specifications and quality control procedures, but we also ensure that all required inspection and testing operations are complete.

We must follow good manufacturing practices (GMPs) and related regulations and standards to ensure that processes are clearly defined and well-documented, and that employees are formally trained to develop methods to improve product quality and customer satisfaction.

Expectations:

- We are committed to following the product quality and safety standards that apply to our role at Bio-Rad.
- We comply with standards related to the development, manufacturing, labeling, sales and marketing, and approval of products.

Avoiding Conflicts of Interest

We lead with integrity and transparency and never let our own interests conflict with Bio-Rad's interests. We can't always avoid conflicts of interest, so we must know how to disclose and manage them properly.

We do not allow our personal interests to compete or conflict with our ability to perform our job objectively for Bio-Rad. We also carefully avoid situations where even the mere appearance could suggest to someone else that there may be a conflict of interest.

We speak up immediately and come forward to disclose any issues or potential conflicting situations either to our manager or to Bio-Rad Corporate Compliance. Conflicts can be confusing and difficult to navigate. We seek help if we have questions about a potential or existing conflicts of interest.

Some common conflicts of interest that may arise and require us to seek guidance include:

- **Supplier and Customer Relationships** – if you, your immediate family, or a close friend owns or operates a business partner or customer of Bio-Rad, that relationship could be a conflict of interest.
- **Financial Interests** – if you, your immediate family, or a close friend invest in a company that partners or competes with Bio-Rad, you should disclose that investment, as it could be a conflict of interest.
- **Close Personal Relationships at Work** – if you have direct decision-making authority over a friend, family member, or romantic partner, or that person has such authority over you, this could be a conflict of interest.
- **Corporate Opportunities** – if you take personal advantage of business opportunities, or otherwise personally benefit from information you learn about due to your role at Bio-Rad, it could be a conflict of interest. You must notify Bio-Rad Legal before you pursue any business opportunity you learn of in your role.
- **Outside Leadership Activities** – if your outside professional activities, for example, serving on boards or committees, interfere with your obligations to Bio-Rad, it could be a conflict of interest. You must obtain written approval from the Bio-Rad Corporate Compliance before engaging in such outside activities.
- **Gifts** – giving or receiving gifts from a business partner could be a conflict of interest. You must obtain approval from Bio-Rad Corporate Compliance before giving or receiving gifts.

Expectations:

- We never let our personal interests interfere with our duty to Bio-Rad.
- We quickly disclose any potential conflicts of interest to Bio-Rad Corporate Compliance.
- We understand that even the appearance of a conflict of interest can be damaging to Bio-Rad, and we seek guidance when we have questions.
- We avoid business relationships, investments, or other financial interests that might conflict with our role at Bio-Rad.

Competing Fairly and Following Competition/Anti-Trust Laws

Fair markets and fair competition are important to us, and we do all we can to compete with integrity.

We compete in the world market by providing quality, innovative products and by consistently meeting our customers' needs through our commitment to long-term relationships with our customers. We never engage in unfair or anti-competitive behavior, nor do we make untruthful statements about our products and services or those of our competitors.

There are international laws and regulations that prohibit anti-competitive behavior and levy severe penalties for violations. These laws can be complex and confusing, but they generally forbid making informal or formal agreements with competitors that might be unfair to customers or harm the fair market. Some activities that are specifically covered include:

- Bid rigging
- Price fixing
- Dividing or allocating market segments or territories
- Agreeing with our competitors to limit competition or output

Since even informal agreements can be suspect, we must be wary of all our interactions with competitors, such as speaking with a competitor at a trade show or meeting. Should you ever become involved in a discussion involving any prohibited topics, you should stop the conversation immediately and notify Bio-Rad Legal.

Expectations:

- We limit contact with our competitors and make sure to immediately end any discussions around competitive activity or pricing; we report incidents to Bio-Rad Legal.
- We compete based on innovative products, superior customer service, and value, not through agreements with our competitors.

- We ask questions and report concerns, understanding that competition law can be complex and confusing.

Complying with Trade Controls and Sanctions

We make the right decisions when it comes shipping our products globally, and that means that we respect and follow customs and trade regulations that apply to our products and to any intellectual property (IP) exchanged with third parties.

We get involved and make a difference globally. We're committed to introducing our products worldwide and serving our customers worldwide. When we conduct our business internationally, we obey the laws and regulations that govern international trade. To transfer our products overseas, we must make sure we have obtained all the appropriate government approvals. The failure to do so could result in the loss of export or import privileges as well as civil or criminal penalties. This includes reporting correct Harmonized Tariff Schedule number (HTS), Country of Origin and value.

In addition to verifying the eligibility of both the location and the recipient of any item, we must also secure any necessary import licenses or authorizations, such as those from the FDA or other world health organizations for our medical products. We must also know the permits or licenses required to import or export our products in each country.

Bio-Rad does not conduct business with countries embargoed by the U.S. government, and we are limited in the type of business that we can conduct in sanctioned countries or with sanctioned individuals. We do not engage in any transactions or dealings with sanctioned countries or individuals. Embargos and sanctions can be complex and the countries affected can change, so consult with Bio-Rad Legal to obtain a current list of countries in which we must avoid conducting business.

We may not cooperate with any boycott of a particular person or country, such as the Arab League boycott of Israel, which is not approved by the U.S. government. We are required by law to report any requests to participate in unsanctioned boycotts. If you have questions about boycotts, contact Bio-Rad Corporate Compliance.

Expectations:

- We make sure that we know all import, export, sanction, and anti-boycott laws and regulations that apply to our role at Bio-Rad.
- Since this area of the law can be complicated and changeable, we contact Bio-Rad Global Trade Compliance immediately with any questions or concerns.

- Contact Bio-Rad Global Trade Compliance if a customs agency contacts you.

Gifts and Entertainment

Any gifts and entertainment given or received must be modestly valued, exchanged infrequently, appropriate, and tied to a legitimate business purpose.

We succeed at Bio-Rad through innovation and providing for our customers' needs. We do not seek to gain a business advantage or improperly influence anyone by providing improper or lavish gifts or entertainment, and we recognize that we may only provide or receive modest, infrequent, and appropriate gifts and entertainment that are related to a legitimate business purpose.

Certain gifts are never offered or given, include:

- Cash and cash equivalents (such as gift cards)
- Tickets to sporting events or concerts
- Contributions to political events, parties, or candidates
- Unapproved contributions to charitable events or organizations
- Any type of kickback

We never provide gifts or entertainment of any kind to government officials.

We can offer occasional meals and refreshments to customers and business partners as long as the meal or refreshment is:

- Offered infrequently
- Modest in value
- Related to legitimate business discussions
- Shared only with our customers and business partners, not their family members or friends
- Pre-approved by Bio-Rad Corporate Compliance via Bio-Rad's online system

On occasion, we may offer to pay travel expenses for a business partner to demonstrate products and services or in connection with performance of an agreement, as long as such expenses are reasonable and consistent with our internal travel policies.

We do not solicit or accept gifts, gratuities, kickbacks, or payments for ourselves or our family members that could be seen as an attempt to influence our decision-making at Bio-Rad. We do

not accept gratuities, kickbacks, improper payments, or lavish or inappropriate gifts or from anyone we do business with, including customers, suppliers, and consultants.

We can accept token gifts or meals only if they:

- Are related to legitimate business discussions
- Are modest in value
- Could not be seen to influence our decision-making in any way
- Are pre-approved by Bio-Rad Corporate Compliance via the online system

We may be able to participate in business-appropriate entertainment activities as long as we:

- Pay for our participation
- Receive prior permission from our supervisor

If we are offered an improper gift, we:

- Politely refuse and report it to our supervisor
- Return it to the giver if it cannot be refused
- Give it to our supervisor if it cannot be returned

Expectations:

- We never provide gifts or entertainment to government officials.
- We obtain prior approval from the Bio-Rad Corporate Compliance using our online system before giving or receiving any gifts or entertainment.
- We neither give nor accept gifts or entertainment that could appear to improperly influence either party's business decision-making.

Interacting with Healthcare Professionals and Healthcare Organizations

We take special care when interacting with healthcare professionals (HCPs) and healthcare organizations (HCOs) and make sure we always comply with applicable law and Bio-Rad policy. We must make sure our interactions with all healthcare professionals (HCPs) and healthcare organizations (HCOs) are:

- Always for valid business purposes
- Always consistent with applicable law, our Code, and our policies
- Never meant to unduly influence any HCP's medical or purchasing decisions

We are responsible for knowing the laws, regulations, and Bio-Rad policies that apply to our interactions with HCPs and HCOs. We must make sure that any transfers of value to HCPs or

HCOs are at fair market value (FMV). In some jurisdictions, we cannot provide certain items to HCPs, including gifts, meals, and continuing education credits. In other cases, we must report relevant payments to or transactions with HCPs and HCOs, including:

- Gifts
- Travel reimbursements
- Consulting payments
- Product samples
- Loans of instruments

Expectations:

- We make sure understand all laws, regulations, and Bio-Rad policies that apply to interactions with HCPs or HCOs.
- We make sure our interactions with HCPs and HCOs are for valid business purposes and not meant to improperly influence the HCP's or HCO's decision-making.
- We ask for help when we have questions on HCP and HCO topics, such as Bio-Rad's Business Courtesies Portal, aggregate spend/transparency, or Fair Market Value.

Purchasing and Supplier Relations

We are known for our integrity in the marketplace, and we keep that trust by carefully following our purchasing procedures and maintaining relationships with responsible suppliers.

Our commitment to creating innovative products for our customers requires not only harnessing the teamwork and skill within Bio-Rad, but also the knowledge of the business partners and suppliers that share our mission. We work only with third parties who are committed to abiding by the same laws, regulations, and standards that we follow. At a minimum, we expect our suppliers to comply with all applicable laws, regulations, and standards related to:

- Employment
- The environment
- Anti-corruption
- Fair competition
- Intellectual property (IP)
- Trade controls
- Product quality and safety
- Human trafficking and slavery
- Use of conflict minerals

Using a competitive and non-discriminatory process that complies with all applicable laws, we choose suppliers based on their ability to provide quality goods and services. We follow our

requisitioning process and procedures, as well as all of Bio-Rad's other applicable policies, during the purchasing process. Bio-Rad personnel with purchasing or requisitioning responsibilities must learn and abide by these purchasing rules and procedures.

Expectations:

- We must make sure that our business partners, including suppliers, follow the applicable standards, regulations, and laws that govern our work, just as we do.
- Those of us responsible for requisition or purchasing activities must learn and closely follow our purchasing policies and processes.

Regulatory and Clinical Standards Compliance

We must be aware of regulatory and clinical standards and make sure we meet them.

We develop new ideas and run with them. That's a big part of our success. But many of our research and development activities are subject to regulatory and clinical standards that require consistent and complete compliance. Our work must always focus on the health and safety of the patients who use Bio-Rad products as well as our compliance with the regulations and clinical standards that govern our work.

If your work at Bio-Rad is governed by these regulations and standards, such as requirements of the U.S. Food and Drug Administration (FDA) and other regulatory health authorities, then you are required to understand and follow the rules, policies, and procedures related to these requirements.

While there are many regulations, including international laws, that apply to the full lifecycle of our products, compliance with the standards pertaining to product design, validation, and good clinical practices are particularly important to the health and safety of the patients who ultimately benefit from our products.

Expectations:

- We learn and follow rules, policies, and procedures that comply with applicable laws and standards.
- We recognize that regulatory and clinical standards protect the health and safety of our customers and patients who benefit from using our products, and we take these standards seriously.

Integrity Helpline

If you wish to report any issues regarding business conduct at Bio-Rad, please visit our Integrity Helpline located at www.Bio-RadIntegrityHelpline.com.

Bio-Rad will electronically distribute this Code to all Bio-Rad personnel and make it available via the company website. All Bio-Rad personnel must acknowledge that they have read and understood the Bio-Rad Code of Business Ethics and Conduct as part of mandatory compliance training on this Code.

This Code has been approved and adopted by Bio-Rad's Board of Directors, and any amendment must be in writing and must be authorized by our Board of Directors or a committee thereof. There may be limited situations that warrant a formal waiver of a provision of this Code for an individual. Only the Corporate Compliance Officer or the Legal may grant such waivers, which must be obtained in advance of the proposed action; however, only the Board of Directors or a committee thereof may grant a waiver for actions by executive officers or directors. Any amendment or waiver will be disclosed promptly in accordance with any applicable legal or listing requirements.

Bio-Rad Interactive Code of Business Ethics and Conduct
Bio-Rad Laboratories, Inc.
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