

The Code of Conduct of the Ypsomed Group



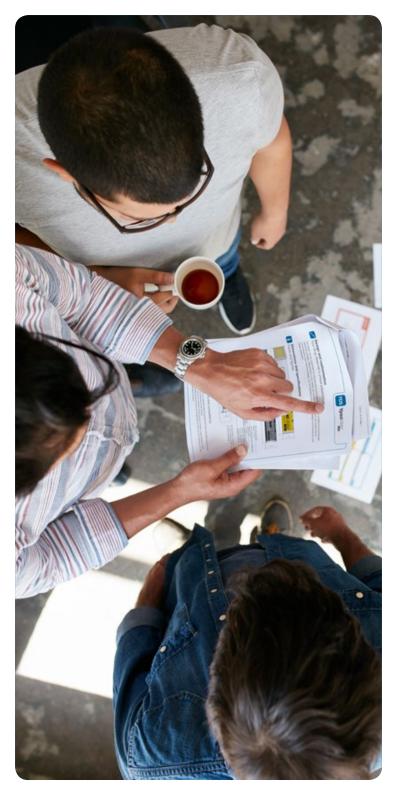
Dear colleagues,

The success and reputation of the Ypsomed Group (Ypsomed in the following) depend directly on how we behave towards our customers, business partners and shareholders, but also towards each other. With a high level of performance in all our activities and honest, open and responsible conduct, we strengthen the trust placed in us by our customers, business partners and shareholders.

This Code of Conduct describes the most important rules of conduct to support you in your daily actions and decisions within the company.

We urge you to take on the responsibility to implement our values consistently. Be a role model and remind our employees to respect our values and leadership principles or if you have concerns about a specific behaviour.

As an executive, you integrate the Code of Conduct into your decisions and motivate your employees to act accordingly.





Social Responsibility

Compliance With Legal Regulations

We comply with the laws and regulations of the countries in which we operate. We respect the different regional cultural and social rules in accordance with the laws and our values.

It is the responsibility of each individual to inform himself or herself about the applicable laws, regulations as well as cultural and social customs.

Health and Safety

We protect the health and well-being of ourselves, our fellow human beings and the environment by following relevant environmental guidelines and laws as well as internal instructions and guidelines and adhering to the processes. When making decisions, we always take into account the effects on the environment and society. We use our resources consciously and sparingly. We regard sustainability as an opportunity to make a contribution to a healthy and sustainable life.

We focus on the needs of patients and customers and contribute to the best possible quality of life with innovative, simple-to-use and reliable products.



Conduct in the Work Environment

Respect and Appreciation

The international expansion of new subsidiaries fosters the cultural diversity within our company and we are proud to drive our success forward with fresh ideas. We treat our employees, customers and business partners honestly, fairly and with respect. We respect the personality of our counterparts and avoid any kind of discrimination and harassment. We do not tolerate differentiation based on gender, origin, language, religion or sexual identity, age or other personal characteristics.

We promote equal rights and opportunities for all employees and treat them with respect and appreciation.

Communication

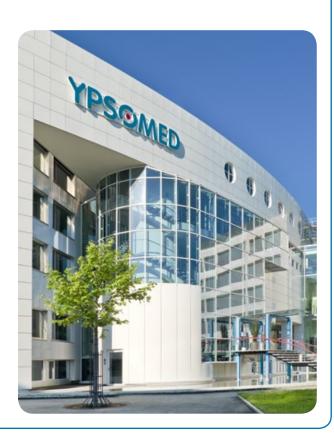
We foster transparent, honest and open communication with our customers, business partners, shareholders and employees. Here, we adhere to the following principles: prompt, clear, unambiguous, uniform, and appropriate to the target group.

Our written correspondence and documentation is comprehensive and we pay attention to refined or cultivated language, whereby we focus on the essentials.

Integrity

We strongly condemn bribery and any other form of corrupt business conduct and prevent such situations through transparency and honesty. This applies in particular when dealing with medical professionals and institutions. where we observe the applicable industry codes of the respective country.

If personal interests or relationships influence or even appear to influence our business activities, we disclose the situation. Together with our executives, we take appropriate actions to defuse possible conflicts.





Conduct Towards Our Customers

We strive for long-term relationships with our customers that are characterised by openness and reliability of delivery. We convince them through our innovative and high-quality products and create a good relationship of trust through professional action.

We only promise what we can deliver, set priorities and ensure proactive and clear communication.

Conduct Towards Suppliers and Advisers

The relationships with our suppliers and advisers are based on trust and respect. We take it for granted that our business partners comply with the law and take their responsibility towards employees, society and the environment seriously. Suppliers and advisers with an impeccable reputation deserve our trust.

Conduct Towards Competition

We treat our competitors objectively and fairly and respect the protection of intellectual property. Through professional business conduct, we dissociate ourselves from any action that can prevent, restrict or distort free competition.

We gain a competitive advantage through innovative products, high quality and performance standards as well as integrity and competence.

We respect and protect the entire assets of Ypsomed and handle them responsibly and with care.

Intellectual Property

We identify our intellectual property and, if necessary, protect it with appropriate actions.

Confidentiality

We only use business secrets, confidential information of our business partners and personal data, in particular health data, within the law and for specified purposes. We do not share confidential information illegally with third parties such as customers, suppliers and family members.

We never use confidential information for personal purposes and also do not use it for recommendations for the purchase or sale of securities of Ypsomed Holding AG or other companies.

We use electronic means of communication responsibly and conscientiously and avert dangers through online activities.



Compliance and Implementation

Implementation and Training

This Code of Conduct is part of the employment contract. It is posted on Ypsomed's intranet and homepage.

We are sensitised to correct behaviour through suitable and function-related training and other supporting documents. The training courses are obligatory for us and we attend them regularly. Our executives, Human Resources and the Legal Department provide support in questions and doubts about the Code of Conduct and provide advice to all employees.

Misconduct

If we observe situations and incidents that violate this Code of Conduct, we can approach our responsible manager, Human Resources, the General Manager and/or the Legal Department.

At Ypsomed we cultivate an open corporate culture characterised by mutual trust. Employees who report suspected misconduct in good faith need not fear any personal disadvantages. The responsible departments take each report very seriously and keep it as confidential as possible.

The Management does not tolerate any violations of the Code of Conduct or applicable law. Fallible employees must expect disciplinary measures under civil, criminal and employment law, including dismissal.

Taking effect

This Code of Conduct was approved by the Board of Directors on March 8, 2018 and will enter into force on April 1, 2018. This supercedes the Code of Conduct dated January 1, 2010.