



QuidelOrtho Corporation

Code of Business Conduct and Ethics

QUIDELORTHO CORPORATION
CODE OF BUSINESS CONDUCT AND ETHICS

MESSAGE FROM THE CEO

Dear Team,

As we advance the power of diagnostics for a healthier future, it is essential to reflect on the crucial role each of us plays in our shared mission. At QuidelOrtho, we are not just developing tests; we are reimagining what is possible in global health. This ambitious goal demands that every one of us embody our core behaviors in all our interactions.

Our success is fueled by our core behaviors that drive QuidelOrtho's culture, guiding our conduct in everything we do. It is through these tenets that we:

Thrive Together: By imagining, creating and transforming, we feel energized and empowered to perform meaningful work that aligns with our values and goals, and we enhance both individual and organizational performance. By working together with intention and learning from each challenge, we feel connected to our mission and each other. This allows us to turn vision into reality, building solutions that drive meaningful impact for the customers we serve.

Make It Happen: By prioritizing, executing and achieving, we strive to collaborate effectively to deliver results quickly and efficiently, ensuring alignment with our mission. It's essential that we stay focused on our unified strategy, prioritize what matters most and overcome challenges together. We embrace learning and continuous improvement, strengthening our capacity to achieve excellence.

Commit to Service: By prioritizing our colleagues, customers and community, we cultivate a service mindset, foster relationships built on trust and communication and find ways to achieve collective success. Our impact extends beyond our products as we strive to create meaningful connections that foster trust and mutual growth.

Embrace Inclusion: By being open, authentic and ourselves we individually maintain an environment where diverse ideas are valued, and everyone feels a sense of belonging. We want you to thrive by bringing your authentic self to work and sharing your perspectives, ideas and experiences for the benefit of our teams, customers and communities.

At QuidelOrtho, we envision a world where individuals, families, clinicians and communities have the insight and clarity to spot trends sooner, respond quicker and confidently chart their course to better health. By adhering to these core behaviors, along with our Code of Business Conduct and Ethics, we ensure that QuidelOrtho remains a united company, powering a healthier future for all.

I encourage you to reflect on these core behaviors and review our Code of Conduct and Ethics and consider how you can embody them in your daily work. Remember, every action you take, every decision you make and every interaction you have contributes to our collective mission. You are not just an employee; you are a crucial part of a team that is shaping the future of healthcare.

Sincerely,



Brian Blaser
President and Chief Executive Officer, QuidelOrtho

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I. INTRODUCTION

1. Purpose and Scope

The Code of Business Conduct And Ethics (the "Code") is the foundation of the Company's business practices. It contains general guidelines for conducting the Company's business in a manner consistent with integrity, honesty and the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, the Company adheres to these higher standards.

This Code applies to all directors, officers, employees and temporary workers of the Company, globally and to each of its subsidiaries. We refer to all directors, officers, employees and other personnel covered by this Code as "Company employees" or simply "employees," unless the context otherwise requires. In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller or persons performing similar functions, as our "principal financial officers."

2. General Guiding Principles

The following are some of the guiding principles that should help you keep our core values in mind as you conduct the Company's business:

- *Conduct the Company's business in accordance with the highest standards of business ethics and integrity and comply with all applicable laws and regulations.* Employees are expected to use good judgement, common sense and act consistently with the Company's core behaviors in all business dealings.
- *Treat others with honesty, fairness, and respect.* Each employee should endeavor to deal fairly with the Company's customers, suppliers, competitors, collaborators and employees, promoting a positive and inclusive environment.

3. Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and cannot address every situation you may face. This Code should be read in conjunction with our other policies and procedures, copies of which are available on the Company's Intranet or from [Human Resources](#) Department. This Code is not a substitute for those other documents.

Instead, this Code should be viewed as a general statement of the guiding principles that should help you keep our [core behaviors](#) in mind as you conduct the Company's business.

If you feel uncomfortable about a situation or have any doubts about whether it is consistent with this Code or the Company's ethical standards, we expect you to seek assistance. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor regarding the situation, we encourage you to contact the Company's Legal & Compliance Department. The Company has also established the [QuidelOrtho Ethics Hotline](#), which is available 24 hours a day, 7 days a week at 1-855-224-8332 or online. In making a report or inquiry to the hotline, you may remain anonymous and,

although providing your identity will assist the Company in addressing your questions or concerns.

4. Manager Responsibilities

Executive officers, managers and supervisors have additional responsibilities to lead by example, acting as role models through your words, decisions, actions and behaviors and by holding yourselves to the highest standards of ethical business conduct. Other examples include:

- Reinforcing this Code through regular communications to employees emphasizing the importance of ethics and compliance.
- Creating an open, inclusive and positive work environment where all employees have opportunities to succeed and are comfortable raising questions and concerns.
- Ensuring employees' business conduct is in compliance with this Code.
- Never retaliating or ignoring acts of retaliation against others.
- Immediately reporting any known or suspected ethical or legal misconduct or violation of this Code or applicable law to the Company's Chief Legal Officer or a Vice President in the Legal & Compliance Department.
- Never conducting your own investigation of any known or suspected ethical or legal misconduct or violation of this Code or applicable law without prior approval from the Company's Chief Legal Officer or a Vice President in the Legal & Compliance Department.

5. Reporting Violations of This Code

All employees are expected to report any known or suspected violation of this Code, including violations of laws, rules, regulations or policies that apply to the Company. If you suspect a violation of this Code or the law, you are expected to immediately report the conduct to a supervisor (who should report to the Company's Chief Legal Officer or the Company's head of Internal Audit), the Company's Chief Legal Officer or a Vice President in the Legal & Compliance Department, or on the QuidelOrtho Ethics Hotline. Upon receipt, the Chief Legal Officer, or their designee, will work with appropriate people to investigate the concern. If the complaint involves the Chief Legal Officer or creates a conflict of interest if the Chief Legal Officer were to handle it, such complaints will be directed to the Company's head of Internal Audit. As previously stated, when submitting a report to the QuidelOrtho Ethics Hotline, employees may remain anonymous and will not be required to reveal their identity in calls to the QuidelOrtho Ethics Hotline. All reports of known or suspected violations of the law or this Code will be handled with sensitivity and discretion. The employee's supervisor (if notified), the Chief Legal Officer, and any other individual duly authorized to participate in the investigation and follow-up on the report will protect identity and confidentiality to the greatest extent possible, consistent with applicable laws and the Company's need to investigate potential concerns.

6. Discipline for Violations of This Code

It is Company policy that any employee who violates this Code will be subject to appropriate discipline, in accordance with the Company's policies and procedures, which may include termination of employment (or removal from the Board of Directors to the

extent permitted by law), as appropriate.

As an employee, your conduct is representative of the Company. If it does not comply with the law or with this Code, it can result in serious consequences for both you and the Company. Employees who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Nothing in this Code restricts your ability to report any waste, fraud or abuse related to the performance of a government contract directly to the appropriate government entity in accordance with applicable law.

7. The Company's Policy Against Retaliation

The Company prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee because such employee, in good faith, sought help or filed a report, will be subject to disciplinary action, including potential termination of employment (or removal from the Board of Directors to the extent permitted by law). Any such reprisal or retaliation should be reported using the channels listed in this Code.

8. Waivers of This Code

Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board of Directors and will be disclosed to the public as required by law or the rules of the Nasdaq, when applicable. Waivers of this Code for other employees may be made only by the Chief Executive Officer or the Chief Legal Officer and will be reported to our Audit Committee.

II. CONFLICTS OF INTEREST

1. Identifying Potential Conflicts of Interest

Employees must act in the best interests of the Company and refrain from engaging in any activity or having a personal interest that presents a "conflict of interest" and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of the Company. A conflict of interest can arise whenever you, as an employee, act or have an interest that prevents you from performing your Company duties and responsibilities honestly, objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be promptly disclosed via the Conflict of Interest Disclosure form available on Workday:

- Outside Employment. An employee being employed by, serving as an employee of, or providing any services to a company or individual that the employee knows, or suspects is a customer, supplier or competitor of the Company (other than services to be provided as part of an employee's designated job responsibilities for the Company). Additionally, outside employment with companies that are not necessarily a customer, supplier or competitor of the Company may create a conflict of interest if it would

otherwise interfere with the employee's ability to perform their role at the Company. Similarly, an actual or apparent conflict of interest may arise if an employee serves as a personal fiduciary for another person, particularly if that relationship developed in the context of the employee's role with the Company.

- Improper Personal Benefits. An employee obtaining any material personal benefits or favors (as to them or their family or friends) because of their position with the Company. Please see the "Gifts and Entertainment" section below for additional guidelines in this area.
- Financial Interests. An employee having a "material interest" (ownership or otherwise) in any company that the employee knows, or suspects is a material customer, supplier or competitor of the Company or where you could use your position at the Company to influence a transaction with such other company. A material interest includes the employee or the employee's family members or friends directly or indirectly holding 5% or more of the equity or voting interest of a firm, corporation or other entity. The Legal & Compliance Department will consider the interest in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier or competitor, the relationship of the employee to the specific transaction and the importance of the interest to the employee having the interest.
- Loans or Other Financial Transactions. An employee obtaining loans or guarantees of personal obligations from or entering any other personal financial transaction with any company or individual that the employee knows, or suspects is a material customer, supplier or competitor of the Company. This guideline does not cover arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. An employee serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.
- Actions of Family Members. The actions of family members of employees outside the workplace may also give rise to the conflicts of interest described above because they may influence the employee's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life partner, brothers, sisters, parents, in-laws, children and grandchildren, whether such relationships are by blood or adoption.

If you are uncertain whether a conflict exists with a particular company or individual or whether they are a material customer, supplier or competitor, you must refrain from the activity and promptly disclose such situation and seek guidance. A copy of the [Conflict of Interest Policy](#) is available on the Company's Intranet or from the Human Resources or Legal & Compliance Department.

2. Disclosure of Conflict of Interest

The Company requires employees to disclose any situation which reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must disclose it during the onboarding process or, if it arises during the period you are engaged with, employed by and/or providing services to the Company, via the Conflict of Interest Disclosure tool. If you are a member of the Company's Board of Directors, a principal financial officer or a Senior Vice President and above, you must disclose your conflict to the Chief Legal Officer. The Legal & Compliance, Human Resources Department or the Chief Legal Officer, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. For the avoidance of doubt, the Legal & Compliance, Human Resources Department or the Chief Legal Officer, as applicable, to the fullest extent permitted by law, retain the authority to take any action to prevent any employee from engaging in any transaction or situation that creates a conflict of interest. All transactions that would give rise to a conflict of interest involving an executive officer or principal financial officer must be approved by the Board of Directors, but any such approval will not be considered a waiver of this Code.

III. CORPORATE OPPORTUNITIES

As an employee of the Company, you have an obligation to advance the Company's interests when the opportunity to do so arises within the scope of your employment with or service to the Company. If you discover or are presented with a business opportunity through corporate property or information or because of your position with the Company, you must present the business opportunity to the Company. No employee may use corporate property, information or their position with the Company for personal gain or compete with the Company while employed or engaged by us.

You must disclose to your supervisor the terms and conditions of each business opportunity covered by this Code, whether or not you wish to pursue it in your individual capacity. Your supervisor will contact the Legal & Compliance Department and the appropriate management personnel to determine whether the Company wishes to pursue a business opportunity. If you wish to pursue, and the Company provides you with written notice that it waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

IV. CONFIDENTIAL INFORMATION

Employees have access to a variety of proprietary and confidential information regarding the Company's business and of the Company's business partners. Confidential information includes all non-public information that might be of use to the Company's competitors, or, if disclosed, harmful to the Company or its counterparties, business partners, customers or suppliers. Employees have a duty to safeguard and to not disclose proprietary information and trade secrets and other confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated. Unauthorized disclosure of any such proprietary or confidential information is prohibited. In addition

to the restrictions described above with respect to communicating proprietary or confidential information outside the Company, employees should take appropriate precautions to ensure that proprietary information and trade secrets and other confidential information, whether held by the Company or another entity or individual, are not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. An employee's obligation to protect such proprietary and confidential information continues after they leave the Company, for a length of time required under their agreements with the Company, and if longer, commensurate with the employee's role and the sensitivity of the proprietary or confidential information to which they had access. Unauthorized disclosure of such confidential or proprietary information could cause competitive harm to the Company or its customers and could result in legal liability to you personally and to the Company. In addition, employees should maintain and protect any intellectual property licensed from licensors with the same care as they employ with respect to Company-developed intellectual property. Employees should also handle the non-public information of our collaborators, licensors, suppliers and customers responsibly and in accordance with our agreements with them, including information regarding their technology and product pipelines.

Any questions or concerns regarding whether disclosure of such information of the Company or those having a business relationship with it is permissible or legally mandated should be promptly referred to the Legal & Compliance Department. Nothing in this section or this Code is intended to or should be understood to preclude employees from exercising their rights under applicable laws.

This Code will always be interpreted pursuant to applicable law. For example, in the U.S., this Code will be interpreted consistent with the National Labor Protections Act (NLRA), which protects certain, non-supervisory U.S. employees' rights to engage in protected, concerted activity, including discussions about wages and other terms and conditions of employment.

V. FAIR DEALING

All employees should deal fairly with fellow employees and with the Company's collaborators, licensors, customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

VI. GIFTS AND ENTERTAINMENT

All employees must exercise caution when giving or accepting gifts and entertainment as it might create the appearance of undue influence, unfairness or impropriety. Gifts and entertainment could impair your business judgment or that of our suppliers and business partners, compromise our business relationships, damage our Company's reputation, and violate the law.

1. Suppliers and Business Partners

Gifts of any kind, nature or description, including discounts, coupons and other offers not available to the public should be restricted. However, employees may accept or give

branded promotional items and annual holiday gifts (other than cash or cash in-kind, for example gift cards) in accordance with the gift giving guidelines listed in [Exhibit A](#). Gifts must be consistent with customary industry practices within the region, in compliance with the Company policies, applicable laws and could not reasonably be construed as a bribe or a payoff. All gifts and entertainment expenses must be accurately disclosed and accounted for in the expense reports as well as in the Company's financial records.

Gifts should be limited to one to three times per calendar year from a single source, as customary within the region, disclosed or approved by your direct supervisor, and shared amongst the department if reasonably accessible. For guidance on gifts that do not meet this criterion, please reach out to the Legal & Compliance Department.

2. Government Officials

You may not offer or promise any federal (including federal government contractors), state, local or foreign government official any gifts, entertainment, gratuities, meals, lodging, travel or similar items that are designed to influence such officials. Further, because of the potential for misunderstanding, this restriction applies even if there is no matter pending before such official. You are also strictly prohibited from making any payment or providing anything of value if you know or reasonably believe or suspect that any portion of it will be offered, given or promised, directly or indirectly, to any government official. See the "Anti-Corruption Laws" section of this Code for a more detailed discussion of our policies regarding giving or receiving gifts related to business transactions in other countries.

3. Healthcare Professionals

Laws pertaining to gifts and entertainment to healthcare professionals, including doctors, nurses, laboratory technicians, and medical assistants, vary from country to country and employees must have prior approval from the Legal & Compliance Department before soliciting or providing any item of value to healthcare professionals. For country specific guidance on providing items, hospitality and other benefits to healthcare professionals, see [Healthcare Professionals Hospitality Guidelines](#).

VII. COMPANY RECORDS

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business, and they guide our business decision-making and strategic planning. Company records include financial records, personnel records, records relating to our technology and product development, clinical development, customer collaborations, manufacturing and regulatory submissions, and all other records maintained by our business.

All Company records must be complete, accurate and reliable in all material respects. Each employee must follow any formal document retention policy of the Company with respect to Company records within such an employee's control. Please contact your supervisor or the Legal & Compliance Department to obtain a copy of such policy or with any questions concerning such policy.

VIII. PROTECTION AND USE OF COMPANY ASSETS

Employees should protect the Company's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness and waste have a direct impact on the Company's financial performance. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

Employees should be aware that Company property includes all systems, data and communications, including written communications, transmitted, or received to or by, or contained in, the Company's electronic or telephonic systems. Employees and other users of Company property should not assume that such systems, data and communications are private or subject to privacy. To the extent permitted by law, the Company has the ability, and reserves the right, to access, read, monitor, inspect, review, disclose the contents of and preserve electronic and telephonic communications, including postings to and downloads from all of the Company's information systems. These communications may also be subject to disclosure to law enforcement or government officials.

In addition, your use of the Company's systems and equipment reflects on the Company as a whole, and at no time may you use the Company's systems or equipment to view, access, store, share or send illegal, derogatory, harassing or inappropriate information, including obscene, racist or sexually explicit information, or engage in any activity that violates the intellectual property rights of others. Employees must refer to the [Mobile Device Security Policy](#) and [Acceptable Use Policy](#) available on the Company's Intranet or from the Information Technology Department.

IX. ACCURACY OF FINANCIAL REPORTS AND RELATED PUBLIC COMMUNICATIONS

As a public company, we are subject to various securities laws, regulations and reporting obligations. Applicable laws and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting can severely damage the Company and result in legal liability.

The Company's principal financial officer and other employees working in the Finance Department have an additional responsibility to ensure our financial disclosures are complete, accurate, timely and understandable and fairly represent the Company's performance and financial condition. These employees must understand and comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts. The Company has adopted a separate Policy for Complaints Regarding Accounting, Internal Accounting Controls or Auditing Matters (the "Whistleblower Policy") to govern the receipt, retention and treatment of complaints regarding the Company's accounting, internal controls or auditing matters.

If you have any unresolved concerns or complaints regarding questionable accounting or auditing matters, you should submit those concerns or complaints through any of the methods described in this Code or the Whistleblower Policy. Subject to applicable law and to the fullest extent possible, all such submissions will be treated confidentially. A

copy of the [Whistleblower Policy](#) is available on the Company's Intranet or from the Legal & Compliance Department.

X. COMPLIANCE WITH LAWS AND REGULATIONS

Each employee has an obligation to comply with all laws, rules and regulations applicable to the Company or its operations. These include, without limitation, laws covering bribery and kickbacks, the development, testing, approval, manufacture, marketing and sale of our products, copyrights, trademarks and trade secrets, data protection and privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information and misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your position. If any doubt exists about whether a course of action is lawful, you should seek advice from your supervisor or the Legal & Compliance Department.

1. Interactions With Healthcare Professionals

We interact with healthcare professionals and other customers through research and development, sales, educational and promotional activities. All our engagements with healthcare providers must be legitimate, transparent and appropriate. We believe in building relationships with our customers by providing industry-leading quality, innovation and service, not by offering bribes or other improper inducements. We must not engage in any conduct that is intended to, or has the appearance of, improperly influencing a healthcare provider's judgment or purchasing decisions of the entities that buy our products and services.

We comply with all applicable laws and industry codes that govern our relationships with healthcare providers. Healthcare laws can be complicated and regulated, so if you have questions, reach out to your supervisor or the Legal & Compliance Department.

2. Interactions With the Government

The Company may conduct business with the U.S. government, state and local governments and the governments of other countries. The Company is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to communications with governmental bodies that may have regulatory authority over our products and operations, including government contracts and government transactions.

If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your position, as well as with any applicable standard operating procedures that the Company has implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your supervisor or the Legal & Compliance Department.

In addition to the above, unless you are a member of the Government Affairs Department and are following the procedures established specifically for that

department, you must obtain approval from the Government Affairs or the Legal & Compliance Department for any work activity that requires communication with any member or employee of a legislative body or with any government official or employee. Work activities covered by this Code include meetings with legislators or members of their staffs or with senior executive branch officials on behalf of the Company for lobbying or advocacy purposes (but, for the avoidance of doubt, would not include the Regulatory Department's interactions with the U.S. Food and Drug Administration or similar regulators in countries outside the U.S.). Preparation, research and other background activities that are done in support of lobbying communication are also covered by this requirement even if the communication ultimately is not made. If any doubt exists about whether a given work activity would be considered covered by this requirement, you should seek advice immediately from your supervisor or the Legal & Compliance Department.

3. Interacting With Suppliers and Business Partners

The Company expects to work with suppliers and business partners who share our values. We interact honestly and with integrity with our suppliers and business partners and expect our suppliers and business partners to do the same, including abiding by local laws and regulations. The Company may be responsible for the actions of anyone who represents us, including our suppliers, distributors and other business partners. Before engaging any supplier, distributor or other business partner, employees must ensure that the supplier, distributor or other business partner is assessed through our due diligence process to verify they are qualified and reputable, and that they agree to abide by the Company's [Supplier and Distributor Code of Business Conduct and Ethics](#).

4. Political Contributions and Volunteer Activities

The Company encourages its employees to participate in the political process as individuals and in their own time. However, federal and state contribution and lobbying laws severely limit the contributions the Company can make to political parties or candidates. It is Company policy that Company funds or assets are not used to make a political contribution to any political party or candidate unless prior approval has been given by the Chief Legal Officer. The Company will not reimburse you for personal political contributions. When you participate in non-Company political affairs, you should be careful to make it clear that your views and actions are your own and not made on behalf of the Company. Please contact the Chief Legal Officer if you have any questions about this policy.

5. Charitable Contributions and Donations

Charitable contributions and donations allow the Company to make a real impact in our local communities. These contributions and donations may be in the form of financial support, products or services, or employee volunteering. These contributions and donations are only awarded to bona fide eligible charities and non-profit organizations and are determined by local laws and the guidelines of the Company's charitable giving programs and must be approved as set forth in such program guidelines.

All charitable contributions and donations should be aligned to Company values, for a bona fide charitable purpose, and reviewed and approved outside of the commercial sales process. Charitable contributions and donations should never be used as a quid

pro quo or as incentive for past, present or future sales. If you are uncertain about any charitable contribution or donation, refer to the [Anti-Bribery/Anti-Corruption Policy](#) and Conflict of Interest Policy, which are available on the Company's Intranet, or contact the Human Resources Department for assistance.

6. Compliance With Antitrust Laws

Antitrust laws in the U.S. and other countries are designed to promote and preserve competition by prohibiting certain types of conduct, including certain agreements among competitors or between suppliers and customers that unreasonably restrain competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states and localities in which the Company conducts business. Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions. You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult the Legal & Compliance Department with any questions you may have, concerning compliance with these laws.

a. Meetings or Communications with Competitors

It is a violation of the antitrust laws for competitors to agree on competitive terms such as price, output, bids, market allocations, product strategies, customer terms and conditions, etc. Competitors include not only those that sell products in competition with the Company but also others with which the Company competes for resources. Thus, for instance, the Company may compete for employees even with companies that do not sell competitive products. The antitrust laws prohibit competitors from agreeing on salaries (i.e., prices) for their respective employees or not to poach each other's employees.

Employees should, therefore, exercise caution in any meetings, conversations or other communications with competitors. Even innocent remarks may give rise to the appearance of impropriety. As a result, you must not discuss with any competitor any confidential or competitively sensitive business information, such as the Company's prices, pricing strategies, costs, volumes, or sales projections; product development plans or activities, business plans, marketing plans, or strategies of any kind; territories or geographic markets; plans or terms related to customers, suppliers, or labor, or other competitive terms or any other proprietary, competitively sensitive information.

Any meeting with a competitor must have the prior approval of the Legal & Compliance Department. At such meetings, you should create and circulate agendas in advance of such meetings and maintain a record detailing the purpose and discussion topics at such meetings. Discussions must be limited to approved, legitimate topics. You should not discuss confidential or competitively sensitive business information. Employees should consult the Legal & Compliance Department regarding any conduct or discussions that they believe might be inappropriate or inconsistent with these guidelines.

b. Professional Organizations and Trade Associations

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Such meetings are legal and

proper if they have a legitimate business purpose and are conducted in an open fashion, adhering to a proper agenda. At such meetings, you should not discuss topics such as the Company's pricing policies or other competitive terms or any other proprietary, competitively sensitive information.

You should consult the Legal & Compliance Department regarding any conduct or discussions at a professional organization or trade association that you believe might be inappropriate or inconsistent with these guidelines.

c. Industry Benchmarking

Benchmarking is the practice of comparing a company's prices, terms, performance or processes against others in the industry. Benchmarking is accomplished by industry members sharing certain information, typically with a third party, which consolidates and anonymizes the data. You should exercise caution in participating in any benchmarking activity and should consult the Legal & Compliance Department before doing so.

d. Dealing With Customers and Suppliers

Antitrust laws also prohibit certain types of agreements between customers and suppliers. In most jurisdictions in which the Company operates, these include agreements between a supplier and its distributors regarding the prices at which the distributor can resell the supplier's products; and in some situations, agreements that restrict a distributor from carrying competitors' products; or agreements that require the purchase of a product in order to purchase another (a so-called tying agreement). You should consult the Legal & Compliance Department if you have questions about these arrangements.

In addition, you should be cautious of instances in which a customer or supplier seeks assurances regarding the terms on which the Company deals with the customer's or supplier's competitors. Such assurances can sometimes effectively form an agreement between competitors at the customer or supplier level. You should consult the Legal & Compliance Department if you have questions about such requests from customers or suppliers.

7. Compliance With Insider Trading Laws

Consistent with the Company's Insider Trading Compliance Policy, the employees are prohibited from trading in any type of security while in possession of material non-public information relating to the security or the issuer of such security, whether the issuer of such security is the Company or another company with whom the Company has a business relationship, such as the Company's customers, distributors, suppliers, licensing, collaboration or joint-venture counterparties, contract research organizations, contract manufacturing organizations or a company with which the Company is negotiating a major transaction. In addition, employees are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell the Company's stock or other securities based on material non-public information. Employees who obtain material non-public information about another company in the course of their duties are prohibited from trading in the stock or securities of the other company while

in possession of such information or “tipping” others to trade based on such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment. You are required to carefully read and observe our Insider Trading Compliance Policy, as amended from time to time. A copy of the [Insider Trading Compliance Policy](#) is available on the Company’s Intranet or from the Legal & Compliance Department. Please contact the Legal & Compliance Department with any questions you may have about insider trading laws.

8. Compliance With Trade Control Laws

The U.S. anti-boycott law prohibits certain actions to comply with or support an unsanctioned foreign country’s boycott against a country friendly to the U.S. The prohibited actions include refusing to do business in a certain country, furnishing information about a person in response to a boycott-related request, and implementing a letter of credit that contains a condition related to any of the prohibited actions. The Company is committed to compliance with U.S. anti-boycott laws and related regulations.

The Company complies with economic sanctions regulations adopted by the U.S., the United Kingdom, the European Union and other applicable regulations that prohibit or restrict the Company from doing business with certain countries, organizations, groups or individuals (including but not limited to specially designated nationals named by the Office of Foreign Assets Control (“OFAC”)). The Company has established and maintains procedures to ensure that vendors, financial institutions, customers (and potential customers) are not sanctioned. As a result, all employees should be familiar with any procedures that apply to the employee’s job responsibilities regarding economic sanctions compliance.

You should consult the Legal & Compliance Department with any questions you may have, concerning compliance with anti-boycott restrictions and economic sanctions laws.

XI. PUBLIC COMMUNICATIONS AND REGULATION FAIR DISCLOSURE

1. Public Communications Generally

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media, investment community and social media directly impacts our reputation, positively or negatively. We strive to be transparent with our customers, security holders, potential investors and the public, while also being responsible for the integrity of the information we share with the public on behalf of the Company, maintaining the confidentiality of competitive and proprietary information, and preventing selective disclosure of market-sensitive information.

U.S. securities laws and other applicable laws set out specific requirements around the timing and manner of disclosure of important Company information and require that such information be materially accurate and not misleading. Materially inaccurate or misleading statements or disclosures can result in significant liabilities to the Company

and to the individual making the statement or disclosure, including SEC enforcement action, a cease-and-desist order, or a civil action seeking an injunction and/or civil money penalties.

Additionally, your social media and other online activities related to the Company must comply with the Company's applicable policies and procedures, whether you engage in these activities during work or your own time. Even if you engage in personal, non-work-related social networking that is done off-site and off-duty, it could have an adverse effect on the Company's business interests and/or subject you or the Company to liability.

The Company has adopted a separate Policy Regarding Communications with Analysts, Securityholders and Others (the "Regulation FD Policy") and an External Communications & Social Media Policy (the "External Communications Policy") to maintain the Company's credibility and reputation in the community, to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. All requests for information or comments about the Company or its products from members of the media, analysts and other third parties should be handled in accordance with the Company's policies and procedures regarding public communications, including the Regulation FD Policy and the External Communications Policy. Copies of the [Regulation FD Policy](#) and the [External Communications Policy](#) are available on the Company's Intranet or from the Legal & Compliance Department. Please contact the Legal & Compliance Department with any questions you may have about disclosure matters.

2. Compliance With Regulation FD

As mentioned above, in connection with its public communications, the Company is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for "fair disclosure"). Regulation FD provides that, when we disclose material non-public information about the Company to securities market professionals or shareholders (where it is reasonably foreseeable that the shareholders will trade on the information), we must also disclose the information to the public. "Securities market professionals" generally include analysts, institutional investors and other investment advisors. You are required to read carefully and comply with the [Regulation FD Policy](#), as amended from time to time.

XII. ANTI-CORRUPTION LAWS

Applicable anti-corruption laws, including the Foreign Corrupt Practices Act (the "**FCPA**") and, where applicable, the UK Bribery Act ("**UKBA**") and other local anti-corruption laws, prohibit the Company and its employees and agents from offering, giving or promising money or any other item of value, directly or indirectly, with the intent to improperly secure business, retain business, or to influence any act or decision of any private individual or organization, government official, political party, candidate for political office or official of a public international organization. Stated more concisely, Company employees and agents are prohibited from giving or receiving bribes, kickbacks or other inducements in order to obtain an improper business advantage.

This prohibition also extends to payments to a third-party agent of the Company (an

“intermediary”) if there is reason to believe that the payment will be used indirectly for a prohibited payment to private individuals, private organizations or government officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. Using intermediaries for the payment of bribes, kickbacks or other inducements is a violation of law and is prohibited. Violation of an applicable anti-corruption law can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment.

XIII. ENVIRONMENT, SOCIETY, HEALTH AND SAFETY

The Company is committed to providing a safe and healthy working environment for its employees and avoiding adverse impact and injury to the environment and the communities in which it does business. Company employees must comply with all applicable environmental, health and safety laws, regulations and Company standards. It is your responsibility to understand and comply with the laws, regulations and policies relevant to your position. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and the Company, and disciplinary action by the Company, up to and including termination of employment or service. You should contact the Legal & Compliance Department if you have any questions about the laws, regulations and policies that apply to you.

1. Environment

All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You have a responsibility to promptly report to your supervisor or the Environmental, Health & Safety or the Legal & Compliance Department any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

2. Health and Safety

The Company is committed not only to complying with all relevant health and safety laws, but also to conducting business in a manner that protects the safety of its employees. All employees are required to comply with all applicable health and safety laws, regulations and policies relevant to their positions. If you have a concern about unsafe conditions or tasks that present a risk of injury to you or others, please report these concerns immediately to your supervisor or the Environmental, Health & Safety or the Legal & Compliance Department.

3. Employment Practices

The Company pursues fair employment practices in every aspect of its business. The following is only intended to be a summary of certain of our employment policies and procedures. Copies of the Company’s detailed policies are available from the Human Resources Department. Company employees must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is your responsibility to understand and comply with the laws, regulations and policies relevant to your position. Failure to comply with labor and

employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact Human Resources or the Legal & Compliance Department if you have any questions about the laws, regulations and policies that apply to you.

4. Human Trafficking and Forced Child Labor

The Company recognizes its responsibility as a global corporate citizen to respect human rights, aiding in the fight against the recruitment, harboring, transportation, provision or obtaining of a person, through the use of force, fraud or coercion.

It is unacceptable for our employees, business partners, distributors, suppliers, contractors and subcontractors to engage in forced or involuntary labor whether in the form of prison labor, indentured labor, bonded labor, or any other form of slavery or human trafficking is used in our business. The Company recognizes and complies with all applicable minimum age laws and requirements and do not employ child labor and it is our policy that our business partners, distributors, suppliers, contractors and subcontractors also comply. It is expected that the employment of young workers above the country's legal age for employment involves non-hazardous work and does not hinder their education or health.

It is also unacceptable for our employees, or business partners, including our distributors, suppliers, contractors and subcontractors to engage in human trafficking or any other forms of human rights abuses in our supply chain or facilities, or in carrying out our business. All employees are required to report any suspected instances of human trafficking or forced labor, child or otherwise to their supervisor or the Legal & Compliance Department.

5. Harassment and Discrimination

The Company is committed to providing equal opportunity and fair treatment to all individuals based on merit, without discrimination based on race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law. The Company also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

If you witness or have any complaints about discrimination or harassment, report such conduct to your supervisor, the Human Resources Department or the [QuidelOrtho Ethics Hotline](#). All complaints will be treated with sensitivity and discretion. Your supervisor, the Human Resources Department and the Company will protect your confidentiality to the fullest extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint.

Any member of management who has reason to believe that an employee has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the Legal & Compliance Department or the Human Resources Department immediately.

6. Alcohol and Drugs

The Company is committed to maintaining a drug-free workplace. All Company employees must comply strictly with Company policies regarding the abuse of alcohol and the possession, sale and use of illegal substances. Drinking alcoholic beverages is prohibited while on duty or on the premises of the Company, except at specified Company-sanctioned events or as otherwise authorized by management. Using, selling or offering, or illegally possessing drugs and other controlled substances is prohibited under all circumstances while on duty or on the premises of the Company. Likewise, you are prohibited from reporting for work or driving a Company vehicle or any vehicle on Company business, while under the influence of alcohol or any drug. Employees using prescription medications that may impair their ability to safely perform their duties must comply with applicable Company policies.

7. Violence Prevention and Weapons

The safety and security of Company employees are vitally important. The Company will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business, you must immediately report the situation to your supervisor or the Human Resources, Legal & Compliance or Environmental, Health & Safety or Security Department, where applicable.

The Company does not permit any individual to have weapons of any kind on Company property or in vehicles, while working on premises or off-site while on Company business. This is true even if you have obtained legal permits to carry weapons. The only exception to this policy applies to security personnel authorized by Company management to carry weapons.

XIV. PRODUCT QUALITY AND SAFETY

The Company is committed to providing quality products and services to our customers in compliance with applicable laws and regulations governing the development, manufacturing, transportation, storage, labeling and approval of those products. We focus on understanding the requirements of our customers and providing products and services that meet or exceed their specifications and expectations. We design, manufacture and deliver products and services that fit their intended purpose and, as applicable, approved indication, and we take care to ensure we are aware of, and comply with, regulatory requirements related to the approval, labeling, and sales and marketing of our products. This means we must always be certain we understand and follow all contract specifications and quality control procedures and complete all required inspection and testing operations properly. To fulfill our commitment to product quality and safety, we expect our suppliers to ensure the quality and safety of goods and services they provide to us.

XV. CLINICAL/REGULATORY COMPLIANCE

For information or questions regarding product regulatory matters, the conduct of clinical trials and research studies, the communication of results from such trials and research studies and interactions with healthcare professionals, please refer to the Company's policies on interacting with healthcare professionals or contact the Clinical/Regulatory or Legal & Compliance Department.

XVI. DATA PRIVACY AND PROTECTION AND PERSONAL INFORMATION

The Company is committed to complying with all applicable data privacy and protection laws, including, where applicable, the General Data Privacy Regulation, the California Consumer Privacy Act, as amended, China's Personal Information Protection Law and other applicable laws and regulations. We respect the privacy of our employees, temporary workers, customers and third parties who work with us. Access to personal information is strictly limited by Company policy and privacy laws and regulations. The Company expects you to safeguard any personal and sensitive information that the Company has entrusted you with. As these requirements may be complex, rapidly changing and dependent on the location of our operations, please contact the Legal & Compliance Department if you have any questions regarding our legal responsibilities, the Company's privacy policies or employee obligations regarding personal information. A copy of the [Global Privacy Policy](#) and Privacy Notice is available on the Company's Intranet or from the Legal & Compliance Department.

XVII. CONCLUSION

This Code contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, or if you have concerns or a complaint about any activity or conduct that you believe or suspect violates the letter or spirit of this Code, you are expected to contact any one of the following:

- Your supervisor;
- The Legal & Compliance Department; or
- The QuidelOrtho Ethics Hotline, by telephone at 1-855-224-8332 or through the internet at [Ethics Hotline](#).

This Code, as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. The Company reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

The Company expects all of its employees to adhere to the standards set forth in this Code. In connection with the annual training on this Code, each employee will be required to complete an online certification of compliance

form, stating that they have read, understand, have complied and will comply with this Code.

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Effective Date: June 17, 2025

Exhibit A: Corporate Gift Limits for Offering or Accepting Gifts from Suppliers and Business Partners

Country	Amount (USD)	Local Currency Amount
North America		
United States	\$115	115 USD
Canada	\$115	165 CAD
EMEA		
Austria	\$41	40 EUR
Belgium	\$72	70 EUR
Czech Republic	\$41	1000 CZK
Denmark	\$79	570 DKK
Egypt	\$11	11 USD (equivalent of 600 EGP)
France	\$67	65 EUR
Germany	\$51	50 EUR
Ireland	\$77	75 EUR
Italy	\$62	60 EUR
Luxembourg	\$77	75 EUR
Netherlands	\$77	75 EUR
Norway	\$80	900 NOK
Portugal	\$51	50 EUR
Russia	\$45	45 USD (equivalent of 4000 RUB)
Saudi Arabia	\$52	195 SAR
Spain	\$62	60 EUR
Sweden	\$76	820 SEK
Switzerland	\$110	100 CHF
Türkiye	\$25	25 USD (equivalent of 945 TRY)
United Arab Emirates	\$62	230 AED
United Kingdom	\$81	65 GBP
LATAM		
Brazil	\$42	42 USD (equivalent of 210 BRL)
Chile	\$46	46 USD (equivalent of 36,800 CLP)
Colombia	\$36	36 USD (equivalent of 144,000 COP)
Mexico	\$51	51 USD (equivalent of 918.00 MXN)
Panama	\$47	47 USD (equivalent of 47 PAB)
JAPAC		
Australia	\$91	144 AUD
China	\$49	318 CNY
India	\$30	2,500 INR
Japan	\$33	5,000 JPY
Malaysia	\$33	148 MYR
Philippines	\$33	1,815 PHP
Singapore	\$60	81 SGD
South Korea	\$54	68,040 KRW
Thailand	\$31	1,116 THB

Note: Suppliers and business partners include, but are not limited to, distributors, providers of goods or services such as IT service providers, law firms, marketing agencies, financial consultants, office supply vendors, catering services, facility management companies, etc.

For additional guidance, click on [Business Courtesies Guidance document](#) available on the Company's Intranet, or contact the Legal & Compliance Department for further assistance.



At QuidelOrtho, we transform diagnostic data into answers, understanding and action, illuminating the path forward for all. For more than 80 years, we've pursued the unknown with a passion and purpose to improve health. And we'll continue to transform the power of diagnostics into a healthier future for all.