

<i>Title:</i> <b>CODE OF BUSINESS CONDUCT AND ETHICS</b>	<i>Supercedes:</i> <b>March 11, 2015</b>	<i>Total Pages:</i> <b>16</b>
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## POLICY

It is the policy of Thermo Fisher Scientific Inc. ("Thermo Fisher" or the "Company") to (i) require the highest standards of business ethics and integrity on the part of all employees and (ii) to comply with all applicable laws and regulations in the conduct of its business. To that end, Thermo Fisher has adopted and implemented this Code of Business Conduct and Ethics (the "Code").

This Code is also available on the Company's intranet – iConnect – at <https://thermofisher.sharepoint.com/Pages/PoliciesAndProcedures.aspx>. All directors, officers and employees of the Company are responsible for reviewing this Code and certifying annually that he or she has reviewed and is in compliance with the Code. A copy of the certification is available on iConnect and through your Human Resources representative.

Failure by an employee to comply with this Code will result in appropriate disciplinary action, which may include termination of employment. Unless the context requires otherwise, all references to "employees" in this Code shall also refer to officers of the Company.

## SCOPE

This Code applies to all of Thermo Fisher's directors, officers and employees worldwide, including employees of Thermo Fisher subsidiaries.

## NOTICE

*This Code does not create a binding agreement between Thermo Fisher and any employee, director or officer, or other person or entity. This Code (as well as all other policies that the Company may adopt from time to time) may be amended unilaterally by the Company at any time.*

## **COMPLIANCE WITH LAWS AND INTERNAL POLICIES**

The Company requires that all employees, officers and directors comply with all laws, rules and regulations applicable to the Company wherever it does business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

If you become aware of, or have reason to believe there has been, the violation of any law, rule or regulation by the Company, whether by its officers, employees or directors, you are expected to promptly report the matter to your supervisor, a member of the Company's Legal Department, or contact the Ethics Hotline (described further in Appendix A). Employees, officers and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because he or she in good faith reports any such violation or belief.

In addition to laws and regulations imposed by local governments and regulatory bodies, the Company from time to time adopts its own policies and procedures. As in the case of laws and regulations, you are also required to comply with the Company's internal policies and procedures.

## **CONFLICTS OF INTEREST**

All directors, officers and employees are required to avoid any relationship with other individuals or organizations that might impair, or even appear to impair, the proper performance of their Company-related responsibilities. Directors, officers and employees must avoid any situation that might affect their independence of judgment with respect to any business dealings between the Company and any other organization or individual. Any employee who believes that he or she may have such a conflict, whether actual or potential, must report all pertinent details to his or her supervisor or a member of the Company's Legal Department. Any director or officer who believes that he or she may have a conflict of interest, whether actual or potential, must report all pertinent details to the Company's General Counsel.

If you become aware of a conflict involving another person in the Company, whether actual or potential, you should report all pertinent details to your supervisor, your Human Resources Director, or a member of the Company's Legal Department.

A conflict of interest situation can arise in many ways, some of which are set forth below.

### **A. Related-Party Transactions**

Related-party transactions are those in which the parties do not deal with one another at arm's length. They include, but are not limited to, any employee of the Company who is in a position to influence a business transaction between the Company and: (1) an individual who is his or her spouse, child, sibling, parent, partner, present or former close business associate; (2) a non-Company organization for which he or she currently serves as an officer, trustee or partner, or for which he or she has recently served in such capacity; or (3) any individual or organization with whom he or she is negotiating, or with whom he or she has an arrangement, concerning

prospective employment.

The Company should avoid related-party transactions. If any employee believes that a related-party transaction exists or might occur, he or she must make full disclosure to his or her supervisor. After such full disclosure, the existing or potential conflict will be reviewed by the supervisor, and a decision will be made about whether the related-party transaction is appropriate, and whether the Company should proceed with the transaction. In the case of a material related-party transaction, the supervisor must report the matter to the Company's General Counsel.

**B. Outside Business Interests**

Employees are expected to give their full and undivided attention to their Company duties. They should not use Company facilities or their association with the Company to carry on a private business or profession. Employees shall not engage in a profit-making business, or become involved with a nonprofit organization, outside of their employment with the Company, if such business or organization:

- (a) Provides goods, services or assistance to a competitor, customer or supplier of the Company; or
- (b) Interferes with the employee's assigned duties at the Company.

No employee shall have a financial interest in a competitor, customer or supplier of the Company, other than (x) less than 1% of the outstanding shares of a publicly-held company (with respect to a customer, supplier or competitor) or (y) less than 5% of the outstanding shares of a privately-held company (with respect to a customer or supplier only).

No director may perform services as a consultant, employee, officer, director or advisor or in any other capacity for a competitor of the Company. No director shall have a financial interest in a competitor of the Company, other than an investment representing less than 1% of the outstanding shares of a publicly-held company.

Please see the Company's policy on Outside Relationships for additional information.

**ACCEPTANCE OF COSTLY ENTERTAINMENT OR GIFTS**

In general, Company employees, officers and directors, and their relatives, may not request or accept payments of money or anything of value from any government officials, customers, suppliers or others with whom the Company does business, has done business, or may have occasion to do business. Restricted payments include, but are not limited to, any and all of the following:

- Compensation in any form (cash, kind, credit, etc.).
- Travel, transportation or lodging.
- Entertainment including, but not limited to, tickets to sporting and other events, business meals, and other business-related entertainment activity (golf, tennis, etc.)

unless approved in advance by your supervisor or a member of the Company's Legal Department or ancillary to a legitimate business meeting attended by the person or company providing the entertainment.

- Gifts of any kind, nature or description, including discounts, coupons and other offers not available to the public in general, provided, however, that employees may accept branded promotional items and annual holiday gifts (other than cash) having a reasonably estimated fair-market value of \$100.00 or less, provided the gifts are consistent with customary industry practices and applicable law and could not reasonably be construed as a bribe or payoff. For guidance on gifts that do not meet this criteria, please contact a member of the Company's Legal Department.

## **IMPROPER PAYMENTS, GIFTS AND GRATUITIES**

### **A. Customers and Suppliers**

The use of Company funds or assets for gifts, gratuities or other favors to employees of other businesses, particularly customers or suppliers, to obtain an improper advantage is prohibited. A business courtesy, such as a gift or entertainment, should never be offered under circumstances that might create the appearance of an impropriety. You may not furnish or offer to furnish any gift that is of more than token value or that goes beyond the common courtesies associated with accepted business practices. Our suppliers and customers likely have gift and entertainment policies of their own. You must be careful never to provide a gift or entertainment that violates the other company's gift and entertainment policy. Giving or receiving any payment or gift in the nature of a bribe or kickback is absolutely prohibited.

### **B. Government Officials**

Employees, officers and directors must never offer incentives to foreign or domestic government officials or agents in the hopes of influencing that individual. Employees, officers and directors must never give gifts, gratuities or other payments directly or indirectly to domestic or foreign government officials in an effort to obtain or retain business for the Company or to obtain any special or unusual treatment in connection with a business transaction. Because the reason for a gift, gratuity, favor, or payment may be subject to misinterpretation, the Company prohibits any expenditures of any kind involving government officials without the prior explicit permission of a member of Thermo Fisher's Legal Department. Any such expenditure or transaction must be accurately recorded in the books and records of the Company, in accordance with the requirements of the Company's Chief Accounting Officer.

## **POLITICAL CONTRIBUTIONS**

Political contributions to U.S. federal election campaigns made from Company funds are prohibited. The legality of political contributions to state, local or foreign campaigns or causes must be determined on a jurisdiction-by-jurisdiction basis and, therefore, must be approved in advance by a member of the Company's Legal Department. Political contributions include any donation, gift, or loan of Company funds, assets, or property to or for the benefit of any political party, political committee, or candidate committee, and any use of Company funds, assets, or property to oppose or to support any candidate. This includes: (a) donations, gifts, or loans of

funds, assets or property which are made by employees or third persons, such as agents, or consultants, who are reimbursed in any way by the Company; (b) the uncompensated use of Company services, facilities, or property; and (c) loans, loan guarantees or other extensions of credit.

## **HONEST AND ETHICAL CONDUCT AND FAIR DEALING**

Employees, officers and directors should endeavor to deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees. Statements regarding the Company's products and services or otherwise must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

## **INSIDER TRADING**

All directors, officers and employees are prohibited from engaging, or assisting others in engaging, in any transactions involving the securities of the Company, or the securities of any other entity with whom the Company is engaged (such as suppliers or customers), or with whom it will be engaged, in a business transaction, while you are in possession of any material confidential information about the Company or the other entity (meaning information that significantly affects, or would reasonably be expected to have an effect on, the market price or value of the Company's securities). Pursuant to this Code, you are also prohibited from communicating such confidential information to others who might trade securities on the basis of that information. Such acts may constitute violations of the law and could result in criminal prosecution of the individual and the Company, or result in serious fines or penalties. (See the Company's Insider Trading Policy.)

If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company that you are familiar with by virtue of your relationship with the Company, you should consult with a member of the Company's Legal Department before making any such purchase or sale.

## **ACCURACY OF BOOKS AND RECORDS AND PUBLIC REPORTS**

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission (“SEC”) and in other public communications.

## **CONCERNS REGARDING ACCOUNTING OR AUDITING MATTERS**

Employees with concerns regarding questionable accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters may confidentially (to the extent legally permitted), and anonymously if they wish, submit such concerns or complaints in writing to the Company’s General Counsel or may use the Company’s Ethics Hotline (within the U.S. at 1-888-267-5255; toll-free numbers for use outside the U.S. may be found at (<https://app.convercent.com/en-us/LandingPage/2bbfe717-a10b-e411-af2b-441ea1084c22>)). See “Ethics Hotline.” All such concerns and complaints will be forwarded to the Audit Committee of the Board of Directors. The Audit Committee will evaluate the merits of any concerns or complaints referred to it by the Company’s General Counsel and Chief Financial Officer and authorize such follow-up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint.

The Company will not discipline, discriminate against or retaliate against any employee who reports in good faith a complaint or concern regarding accounting or auditing matters.

## **DEALINGS WITH INDEPENDENT AUDITORS**

No employee, officer or director shall, directly or indirectly, make or cause to be made a materially false or misleading statement to an accountant in connection with (or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading to, an accountant in connection with) any audit, review or examination of the Company’s financial statements or the preparation or filing of any document or report with the SEC. No employee, officer or director shall, directly or indirectly, take any action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of the Company’s financial statements.

## **CONFIDENTIAL BUSINESS INFORMATION**

Employees, officers and directors must maintain the confidentiality of confidential information (defined as nonpublic information from which the Company or other third party derives value and hereafter referred to as “Confidential Information”) entrusted to them by the Company or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited.

You may receive inquiries from third parties for information concerning the Company. Employees (other than the Company’s officers and other authorized spokespersons) must not discuss or disseminate the Company’s Confidential Information to any third party, such as customers, suppliers or potential competitors, except as required in the performance of his or her duties and after an appropriate confidentiality agreement is in place. If you receive inquiries

from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders, you must decline to comment and refer the inquirer to your supervisor or one of the Company's authorized spokespersons.

You also must abide by any lawful obligations that you have to any former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

## **PROTECTION AND PROPER USE OF CORPORATE ASSETS**

Employees, officers and directors should seek to protect the Company's assets. Theft, carelessness and waste have a direct impact on the Company's financial performance. Employees, officers and directors must use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else.

Employees, officers and directors must advance the Company's legitimate interests when the opportunity to do so arises. You must not take for yourself personal opportunities that are discovered through your position with the Company or the use of property or information of the Company.

## **THE GOVERNMENT AS A CUSTOMER**

In addition to the provisions of this Code and other Thermo Fisher policies, employees working with the U.S. government, state or local governments, or governments of those countries where we operate or sell, have an additional obligation to know, understand and abide by the laws, regulations and ethical standards of those governments that may be more strict than those that apply to our non-government customers and suppliers.

Making or receiving payments in the form of bribes, kickbacks or payoffs to or from government officials, customers, suppliers or others with whom the Company does business is strictly prohibited. Any such payments are improper, whether made or received directly or indirectly. In addition, any arrangements, which aid or abet another party in making or receiving such a payment, are improper. Improper payments need not be in the form of money. They may include nonmonetary gifts or the provision of services.

Employees should become familiar with Thermo Fisher's policies, including the Government Contracts Policy, which provide additional expectations in this area and contact a member of the Company's Legal Department with any questions. These policies are available on iConnect (<https://thermofisher.sharepoint.com/Pages/PoliciesAndProcedures.aspx>).

## **EXPORT/IMPORT CONTROL AWARENESS**

Exports and imports are a significant part of the operations of Thermo Fisher. Adherence to export/import control laws and regulations is essential to maintaining the privilege of engaging in international commerce. Failure to comply may subject Thermo Fisher and its

employees to penalties, fines, imprisonment, and loss of export privileges, as well as adverse publicity.

Therefore, it is important that we comply with all export/import control laws and regulations pertaining to our operations. Thermo Fisher must conduct all of its export-related and import-related activities, including sales and shipments of products and transfers of technology, in a manner intended to satisfy its obligations under export/import laws and regulations of the United States and of other countries in which it is engaged in business.

Export control laws apply to more than simply shipping products and spare parts to different countries. They also apply to technology and information communicated to people in or from other countries, or who represent organizations located in certain countries. Thus, an export may occur not only when items are shipped or carried to another country, but also via a telephone conversation, fax, or email, or during a sales or technical presentation, a facility visit, or any other access to technology by a citizen of another country (including our own employees).

All employees should become familiar with Thermo Fisher's Export/Import Control Policy (also available on iConnect (<https://thermofisher.sharepoint.com/Pages/PoliciesAndProcedures.aspx>)). Those who are involved in international sales, or in processing or shipping international orders, or in transmitting technical information need a more detailed understanding of export/import control regulations. For additional information, please see the Thermo Fisher's Export/Import Controls Policy. If you have any questions, contact your Export/Import Coordinator, appropriate export/import compliance personnel of the Company in Pittsburgh, PA or in Waltham, MA, or a member of the Company's Legal Department.

## **MAINTAINING FREE COMPETITION**

U.S. federal and state antitrust laws, as well as international competition laws, prohibit various practices that could limit competition or restrict fair trade. Under these laws, companies may not enter into agreements with other companies, however informally, that unreasonably restrict competition. Some examples of prohibited agreements include: an agreement with competitors to charge customers the same price for products or to divide markets or service territories (i.e., to divide customers); an agreement with suppliers not to sell to the company's competitors; or forcing any customer to buy an item or service as a condition of buying another item or service. Accordingly, employees are expected to be sensitive to the possibility of legal concerns under competition laws which are more fully described in Thermo Fisher's Antitrust Policy and direct any questions or concerns to either your supervisor or a member of the Company's Legal Department.

## **HEALTH AND SAFETY**

The safety and health of employees and the public are of prime importance to Thermo Fisher. Safety rules and work practices are developed to help preserve the safety and health of employees and the public and to comply with applicable regulations. All employees are expected to know the safety rules pertaining to their job assignments, and to comply with these



rules in the performance of their jobs. Thermo Fisher does not tolerate any conduct by employees that jeopardizes the safety of the workplace, other employees, or the public. Subject to applicable law, employees convicted of any crime involving drugs, fraud, dishonesty, violence or sexual related offenses must notify the Company within five days of conviction.

A. Alcohol and Drugs

The Company does not tolerate any employees, officers or directors becoming impaired by alcohol either before or during any work-related activity. Alcohol should not be provided at Company sponsored events except as authorized by a member of the Company's Legal Department and the applicable business unit President, General Manager or Company Vice President, and then subject to such conditions as they may impose. Any person who the Company has a good faith basis to suspect is violating this policy may be subject to medical testing, including blood alcohol testing, to the extent permitted by applicable law. Violation of this policy or refusal to cooperate with testing under this policy will result in discipline, up to and including immediate termination.

The Company will not tolerate the use of illegal drugs or other mind-altering substances by any person. Subject to applicable law, persons may be required to submit to drug screens, blood tests, and other medical examinations as a condition of employment, on a random basis following any accident, or at any time in the event the Company has a good faith basis to suspect a possible violation of this policy or a reasonable interest in conducting such test for the safety of its employees. The presence of any illegal drug or other mind-altering substance in the body is a violation of this policy. Refusal of an employee to undergo testing or to cooperate fully with any of these tests is also a violation of this policy.

Persons are also prohibited from possessing, using, selling or purchasing illegal drugs or other mind-altering substances on Company property, in Company vehicles and on Company business. Off-premises possession, use, sale or purchase of illegal drugs or mind-altering substances outside of working hours may reflect unfavorably on the Company's reputation and is also prohibited.

This policy does not prohibit the proper use of medication under the direction of a physician or the use of over the counter medication in accordance with directions for its use and for legitimate medical purposes. However, the misuse or abuse of such drugs on Company property, in Company vehicles and on Company business is prohibited. A person who is taking prescription or nonprescription drugs must consult with his or her physician to determine if such use could affect the person's ability to perform his or her job in a safe and efficient manner.

If the use of such drug could affect the person's ability to perform his or her job, the person must inform his or her supervisor of that fact, and may request a reasonable accommodation in order to continue working while using such drug. If the Company is unable to provide the person a reasonable accommodation, the employee will not be permitted to work while using the drug.

B. Firearms or Other Weapons

The Company will not tolerate any level of violence in the workplace or in any work-related setting. Firearms or other weapons shall not be in the possession of any person while on Company premises or Company property or when in Company vehicles, or when engaged in Company business regardless of whether or not a person is licensed to carry such weapons, unless authorized in advance by a member of the Company's Legal Department.

C. Harassment

The Company is committed to maintaining a work environment that is free of harassment based on race, color, gender, religion, age, national or ethnic origin, disability, sexual orientation or other classification protected by applicable law. Any such harassment of our employees, applicants or customers by other employees, customers, suppliers or others conducting business with the Company, regardless of whether the harassment occurs directly or indirectly, is prohibited by this policy, whether or not it also violates applicable law. For additional information and guidance, please see the Company's Sexual Harassment Policy.

D. Reporting of Personal Injuries or Property Damage

Any condition at a Company facility or workplace that has resulted in or may be expected to result in (i) personal injury to an employee or visitor or (ii) property damage should be reported to the facility manager, the appropriate environmental health & safety personnel in Waltham, MA, or Pittsburgh, PA, to a member of the Company's Legal Department or through the Ethics Hotline.

## **EQUAL EMPLOYMENT OPPORTUNITY**

It is Thermo Fisher's policy to afford equal opportunity for employment to all individuals of any race, color, religion, sex, national or ethnic origin, sexual orientation, disabled veteran or veteran of Vietnam era status, and age with due regard to their relative qualifications and abilities. Thermo Fisher's Equal Employment Opportunity Policy applies to recruitment, hiring, promotion, demotion, transfer, discipline, layoff, termination, rates of pay, selection for training, and every other type of pre- and post-employment personnel activity.

## **ENVIRONMENTAL PROTECTION**

Thermo Fisher is committed to satisfying all environmental regulatory compliance requirements. Employees are expected to comply with environmental regulations and maintain Thermo Fisher's standards of full compliance with the law. Any questions regarding environmental issues should be directed to the appropriate environmental health & safety personnel in Waltham, MA, or Pittsburgh, PA.

## **PERSONAL PRIVACY**

Subject to applicable law, the Company has the right to inspect employees, their personal possessions and property, personal vehicles parked on Company property and work areas. This includes lockers, desks, file cabinets, workstations, computers, personal mail sent to the Company, voice mail and e-mail. Such searches may be conducted any time, without advance notice. If deemed necessary by management and a member of the Legal Department and subject to applicable law, employees themselves may be asked to submit to a search. At no time will any employee be searched by, or in the presence of, a member of the opposite sex. If an employee does not consent to an inspection, the Company may take disciplinary action, up to and including termination. In addition, subject to applicable law, the Company reserves the right to request visitors to agree to an inspection of their person, personal possessions and property while on Company premises.

In order to effectively evaluate performance and ensure consistency in the message to existing and prospective customers, random call monitoring may be part of the ongoing performance review process for persons in customer contact departments such as Customer Service, Direct Sales and Telemarketing. Call monitoring affords supervisors the opportunity to provide immediate, specific performance feedback, as well as assist with the coaching and development of employees. Any information will be used for internal purposes only. Any call monitoring will be conducted in accordance with all applicable laws.

It is the Company's policy to comply fully with all applicable laws governing wiretapping, eavesdropping, and other forms of electronic surveillance. Subject to applicable law, the Company reserves the right to engage in surveillance of employees and Company premises. It is a violation of this Code and the laws of most states for a person to use any electronic, mechanical or other device to intercept or record the contents of any telegraphic, telephonic, facsimile, modem-transmitted electronic mail or other electronic communication unless one (or in certain jurisdictions all) of the parties to the communication consent to the interception. This includes the use of telephone extensions to overhear other individuals' conversations.

## **ADMINISTRATION AND INTERPRETATION**

Considering the complexity of this Code, and the determination of the Company's management and Board of Directors to comply with both the letter and spirit of all applicable laws and regulations, it is recognized that questions of interpretation will arise. All questions relating to this Code are to be addressed to your supervisor who shall consult with members of management or the Company's Legal Department, as appropriate.

## **WAIVERS OF THIS CODE OF BUSINESS CONDUCT AND ETHICS**

While some of the regulations contained in this Code must be strictly adhered to and no exceptions can be allowed, in rare cases exceptions may be possible. Any employee who believes that an exception to any of these policies is appropriate and in the Company's best interest in his or her case should first contact his or her supervisor. If the supervisor agrees that

an exception is appropriate, the approval of a member of the Company's Legal Department must be obtained.

Any officer or director who seeks an exception to any of these policies should contact the Company's General Counsel. Any waiver of this Code for officers or directors or any change to this Code that applies to officers or directors may be made only by the Board of Directors of the Company and will be disclosed as required by law or stock exchange regulation.

## **ETHICS HOTLINE**

Any employee of Thermo Fisher who observes or suspects a violation of any law, regulation, or this Code of Business Conduct and Ethics, should contact a member of the Company's Legal Department or use Thermo Fisher's Ethics Hotline. Specific information related to the Ethics Hotline may be found in the Ethics Hotline Policy attached to this Code as Appendix A.

**EXAMPLES OF THERMO FISHER'S  
CODE OF BUSINESS CONDUCT AND ETHICS**

- Situation: Is there a need to review all international transactions for export compliance issues?

Practicing Policy:

Review of all international transactions is required to ensure compliance. Keep in mind that Thermo Fisher is a U.S. corporation and U.S. export control laws may apply even for non-U.S. transactions. Thus, if you sell products internationally, process or ship international orders, or communicate sensitive information, you should become familiar with Thermo Fisher's Export Controls Policy and applicable export regulations. Contact the appropriate export compliance personnel of the Company in Pittsburgh, PA or in Waltham, MA, or a member of the Company's Legal Department if you have any questions.

- Situation: With respect to government officials, are gifts and gratuities allowed?

Practicing Policy:

No, gifts and gratuities to government officials are prohibited unless expressly authorized by a member of the Company's Legal Department. Examples of prohibited gifts to public officials include meals, golf outings and tickets to events.

- Situation: Environmental protection laws are complex, so how do I know when to be concerned about a particular situation?

Practicing Policy:

The laws are complex, but you do not need to understand every detail before you report an environmental concern. In general, all materials should be properly labeled, used, sorted and transported, and waste substances must be recycled or disposed of properly. If you use specific materials on your job, you should understand their properties and hazards and wear appropriate safety gear when the duties require you to do so. If you are unsure, ask your supervisor.

- Situation: Among employees, what are some examples of conduct that is considered "out of bounds"?

Practicing Policy:

Prohibited conduct includes disparaging, abusive and/or sexual words, phrases or materials; slurs, negative stereotyping; threatening, intimidating, or hostile acts, including jokes or pranks that might reasonably be perceived as hostile or demeaning; unwelcome touching; written or graphics material or objects that are sexually-oriented, obscene or criticize or show hostility or aversion toward an individual or group.

## Appendix A

### **THERMO FISHER ETHICS HOTLINE**

#### **Policy**

Thermo Fisher is committed to compliance with the laws that affect the conduct of our business and to the highest standards of business ethics and integrity. In order to help ensure compliance with the law and Company policies, including its Code of Business Conduct and Ethics, Thermo Fisher has instituted a "hot-line" for all Thermo Fisher employees to use to report conduct that might involve illegality or other violations of the Thermo Fisher Policies and Procedures.

#### **Scope**

This policy applies to all of Thermo Fisher's worldwide employees, where applicable.

#### **Procedures**

If an employee observes or suspects a violation of a law or regulation or other elements of the Thermo Fisher Policies and Procedures, the employee should contact the Ethics Hotline. The Ethics Hotline may be reached any time by telephone toll-free in the United States at 1-888-267-5255. For employees located outside of the U.S., toll-free telephone numbers for the Ethics Hotline may be found at <https://app.convercent.com/en-us/LandingPage/2bbfe717-a10b-e411-af2b-441ea1084c22>. If you prefer to contact the Ethics Hotline in writing, the address is:

Thermo Fisher Scientific Inc.  
Attn: Ethics Hotline  
168 Third Avenue  
Waltham, MA 02451

All calls will be documented, and then the subject will be referred to appropriate reviewing personnel, who will determine whether an investigation is required. Callers may remain anonymous. Those persons who identify themselves and request confidentially will be treated confidentially to the extent it is legally permissible to do so.

Callers to the Ethics Hotline should be prepared to describe the situation as completely as they can, including dates, names, facilities and/or departments involved, and names of other employees who would provide additional information. Callers should contact the Ethics Hotline even if they do not have all of the facts or if they are unsure if there is a problem. The Ethics Hotline staff, in conjunction with the Thermo Fisher Legal Department, will look into the information provided, attempt to verify it, and take appropriate action.

All concerns and complaints about accounting or auditing matters will also be forwarded to the Audit Committee of the Board of Directors. The Audit Committee will evaluate the merits

of the concern or complaint and authorize such follow up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint.

Contact the Ethics Hotline to report possible violations related to, among other things:

- Accounting or Auditing Matters
- Antitrust Laws
- Conflicts of Interest
- Environmental Laws
- Export/Import Laws
- Food and Drug Laws
- Fraudulent Transactions
- Health and Safety Laws
- Government Contracts Laws
- Political Contributions
- Insider Trading and Other Securities Laws
- Theft, Bribes, and Kickbacks
- Thermo Fisher's Code of Business Conduct and Ethics

## CERTIFICATION

I, \_\_\_\_\_ (please print or type your name), hereby acknowledge that I have reviewed the Thermo Fisher Scientific Inc. Code of Business Conduct and Ethics.

I further confirm that I have complied with the policies described in the Code of Business Conduct and Ethics and will do so in the future.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date