

METTLER TOLEDO is committed to conducting its business ethically, legally, and in a socially and environmentally responsible manner. This document further defines these commitments, which we apply to all our operations globally, modified as necessary to comply with local law.

We have a Code of Conduct, applicable to all employees, officers, and directors, and a Business Partner Code of Conduct applicable to all suppliers, distributors, and other third parties we do business with. Both documents, and additional policies, further define the minimum standards of conduct we expect in our business for relevant audiences.

### Oversight and Management Systems

We operate an Ethics & Compliance Program, designed to prevent, detect, and respond to violations of our Codes of Conduct and the commitments described below. We also operate a sustainability program, called GreenMT, designed to prioritize and pursue targets with respect to: the efficient use of resources; the development of green products and services; ensuring responsible behavior in our supply chain; engaging our employees; and maintaining corporate governance best practices. The Board of Directors oversees both programs and, at least annually, reviews the topics set out in these Ethical, Social and Quality Standards, including with respect to Human Rights. From time to time, the Board requests additional information and reports from senior management, who regularly report to the CEO and are responsible for implementing both programs.

We employ various means, as appropriate, to reinforce and manage the programs described above and the expectations outlined below. These include: comprehensive and topic specific training and communications programs; third party due diligence, training, and audit programs, applicable to suppliers and channel partners; tailored and comprehensive risk assessments; and implementation and effectiveness monitoring. We also operate grievance reporting mechanisms that ensure multiple reporting channels are available to employees and others, including anonymously, and ensure responsible responses when we receive reports.

For more information, please see our Corporate Responsibility Reports and other documents available at [www.mt.com/sustainability](http://www.mt.com/sustainability).

### Legal Compliance

We operate our business within the spirit and letter of the law. We comply with all applicable laws and regulations of the countries in which we operate.

### Ethical Conduct

We are committed to ethical conduct when dealing with employees, suppliers, customers, and business partners and to the highest standards of integrity in all business interactions. We have policies in place prohibiting all forms of corruption, extortion, and similar practices.

### Fair Competition

We compete fairly and ethically for business opportunities. We uphold standards for fair business, advertising, and competition.

## **Anti-Bribery**

We operate our business in compliance with applicable anti-bribery laws. We have policies in place prohibiting any payment or acceptance of bribes or participation in other illegal inducements in business or government relationships, including facilitation payments. We expect the same from our suppliers, agents, distributors, and any other business partners we deal with. We train employees and third parties on these expectations, and we perform risk based due diligence on our third parties to ensure compliance.

## **Gifts, Entertainment and Gratuities**

We conduct our business fairly, relying on the merits of our products, services, and employees. We designed our policy on gifts, entertainment, and hospitality to preserve and maintain our reputation as a global enterprise acting with integrity and basing its decisions only on legitimate business considerations.

## **Business Records**

We are committed to keeping honest, accurate, and reliable financial and business records in compliance with applicable laws and regulations. We have policies and processes in place in order to ensure this. We use our best efforts to ensure that all submissions we make to our clients – orders, sales reporting, and other information – are complete and accurate.

## **Third Party Rights and Information Security**

We respect the intellectual property rights and confidential information of others. We are dedicated to protecting and responsibly processing the information we collect.

We have policies and trainings in place related to data and document security. These include systems ensuring that there is no unauthorized access to computers and equipment and measures to protect electronic assets, such as password protection and computer access restrictions.

We have policies, processes, and training in place to ensure compliance with relevant data privacy laws.

## **Environment**

We are committed to doing business in an environmentally responsible manner that minimizes adverse impacts on the environment. We operate our business in compliance with applicable environmental laws and regulations. We strive to reduce consumption of important input parameters and reduce emissions in all areas. We encourage the conservation of natural resources, avoid the use of hazardous materials where possible, and engage in activities that reuse and recycle.

## **Quality Standards**

We comply with key quality and environmental standards at key sites. Our operations comply with various standards: our principal operations have been certified according to the ISO 9000 quality management system as well as the ISO 14000 standard for environmental management.

## **Product Responsibility**

We strive to carefully examine our products – their design, manufacturing, use, and disposal – to make sure to use opportunities to further reduce their environmental footprint. We seek to improve the energy efficiency of our products. In our product development we focus on minimizing possible risks of our products when being operated. We do not manufacture harmful products such as arms and weapons. We adhere to the applicable laws and regulations regarding the prohibition or restriction of specific substances (such as hazardous materials) including labeling laws and regulations for recycling and disposal.

## **Conflict Minerals**

We comply with the reporting obligations of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. To ensure we meet these commitments, we engage with suppliers to perform reasonable, risk-based due diligence to check the origin of potential “conflict minerals” present in METTLER TOLEDO products. As part of this commitment, we also evaluate our supply base on an ongoing basis.

## **Security and Risk Mitigation**

We have policies in place ensuring that emergency situations are identified and assessed. We have emergency plans and response procedures in place aimed at minimizing the impact of emergency situations. These include emergency reporting, employee notifications, worker training, fire detection and suppression equipment, and adequate exit facilities.

We have security procedures in place to keep unauthorized items or persons from our sites and to prevent such persons or items from being placed into shipments to our customers. These include access control, physical security, and storage and packaging procedures. We comply with the requirements of the Customs Trade Partnership Against Terrorism (C-TPAT), Authorized Economic Operator (AEO) and other (cargo) security programs.

We use our best efforts to mitigate risks throughout our entire supply chain. We set high quality standards for our suppliers, undertake risk assessments of our supply chain, audit our suppliers, and support them in taking adequate measures in order to meet our standards.

## **International Trade**

We are familiar with and operates our business in compliance with applicable laws and regulations relating to the import, export, and re-export of products. We expect the same from our distributors and other business partners.

## **Health and Safety**

We are committed to creating safe working conditions and a healthy and productive work environment for all our workers, including access to clean water. We protect workers from over-exposure to chemical, biological, and physical hazards such as noise, temperature extremes, inappropriate illumination, radiation, and vibration. Worker exposure to physically demanding tasks is evaluated and controlled. We provide appropriate controls, safe work procedures, preventative maintenance, and protective measures to mitigate/minimize health and safety risks in the workplace. Our employees are trained in health and safety at work.

Specific training is provided to workers exposed to demanding tasks or higher risks (e.g. working with hazardous substances).

## **Human Rights**

We support and respect universal human rights, particularly of our workers, business partners, and the individuals in the communities within which we operate. We are committed to upholding the human rights of workers and employ them in compliance with applicable working laws and regulations, including with respect to workforce and labor rights. We do not tolerate corporal or mental punishment or any other forms of abuse. We respect our workers' rights to freedom of association, third-party consultation, and collective bargaining.

We do not use child labor, slavery, or forced, indentured, or involuntary labor. We do not permit these things, or any form of trade or trafficking of human beings in our supply chain.

## **Discrimination and Harassment**

We are committed to creating a diverse workforce at all levels, including management, and maintaining an environment where all employees are treated with dignity and respect and provide our employees with a work environment free of coercion and harassment. We are committed to a workforce free of both direct and indirect discrimination in hiring and employment practices, including with respect to gender, race, disability, ethnicity, nationality, religion, sexual orientation, gender identity/expression, and other minority groups. We are committed to creating a climate of tolerance, diversity, and equal access to opportunities for all our employees.

## **Compensation and Benefits**

We strive to provide compensation and benefits programs that are locally competitive and comply with all local legal requirements, including wage and hour laws relating to minimum and living wages, overtime, and maximum hours. We do not discriminate in the programs we offer to employees, which we tailor as appropriate for local markets, and offer benefits that often include healthcare, retirement, paid and family leave, flexible work arrangements, degree assistance, and non-management bonus programs.

## **Qualified Personnel**

We have well-qualified personnel, trained and skilled for the tasks entrusted to them and for the work to be performed. We expect the highest standards of integrity from our workforce and use our best efforts to ban alcohol, drugs or drug-like substances, weapons, and any other illegal materials from our work environment.

## **Suppliers and Business Partners**

Compliance with the Business Partner Code of Conduct is a prerequisite for business with us. In addition, we encourage our partners to work with their own suppliers and business partners to ensure that they also strive to meet the principles of our Code or equivalent principles.