



Bruker Supplier Code of Conduct

At Bruker, which includes Bruker Corporation and all of its subsidiaries, we value integrity, respect and trust. Ethical behavior, equal opportunity and compliance are at the heart of our business. The words, “Innovation with Integrity” are a call to every one of us to pursue excellence in every aspect of our business. It is the cornerstone of everything we do and the basis of everything we stand for as a Company.

These same standards apply fully to all of our suppliers and their employees and agents (including sub-suppliers and subcontractors, where permitted). Bruker believes that this Supplier Code of Conduct (“Code”) serves as an important framework for suppliers to conduct their business in a legally compliant and socially responsible manner and to meet the expectations of Bruker.

It is the responsibility of all Bruker suppliers to comply with this Code and communicate it to all of their employees, and any third parties they may use in support of Bruker’s business, unless a supplier has its own substantially equivalent, written, fully implemented and actively monitored code of conduct.

We expect our suppliers to support our commitment to full compliance with this Code via the development and implementation of a substantially equivalent policy and risk-based due diligence process over their own supply chains.

Bruker reserves the right to verify our suppliers’ compliance with the Code through self-assessments, (third-party) audits and/or other monitoring activities. In the event that Bruker becomes aware of any actions or conditions that violate this Code, we will request that corrective actions be taken by the supplier. Furthermore, Bruker maintains the right to terminate an agreement with any supplier who does not comply with this Code.

This Code reflects our commitment to incorporating sustainability principles across our global supply chain. We want to work closely with our suppliers to strengthen their sustainability performance in our supply chain. We expect our suppliers to fully comply with all applicable laws and to adhere to environmental, social and governance (“ESG”) standards as specified in international conventions. We particularly expect our suppliers to adhere to the following ESG principles and expect them to cascade these down their own supply chain.

ENVIRONMENTAL PRINCIPLES

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public and of the environment.

Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

Environmental Compliance

Suppliers shall comply with all applicable environmental, health and safety laws, statutory rules, and regulations. This includes the following elements:

- environmental permits and reporting;
- pollution prevention and resource reduction;
- hazardous materials and substances (CLP/GHS, REACH, RoHS, WEEE etc.);
- wastewater, chemicals, and waste management; and
- air emissions and GHG emissions: use of eco-friendly refrigerants with low Greenhouse Warming Potential (where applicable).

If a supplier becomes aware of any material non-compliance with environmental laws, it must be reported to Bruker immediately.

Resource Consumption, Pollution Prevention and Waste Minimization

Business is conducted in a manner which proactively embraces sustainability. Suppliers shall continuously work to optimize their consumption of natural resources, including energy, CO₂, water and contribute to re-use and recycling of materials and products, where possible.

Environmental Impact Management

Business is conducted in a manner which reduces environmental impact. As such, suppliers will measure and minimize the environmental impact of their facilities and operations, including air and greenhouse gas emissions, water (whether in a production process, for irrigation, or for other uses), contamination and waste.

Hazardous Materials and Product Safety

Suppliers shall identify and, where possible, reduce the use of hazardous materials, chemicals, and substances. Suppliers will also ensure their safe handling, storage, and disposal. All applicable employees shall be aware of and trained in related safety procedures.

SOCIAL PRINCIPLES

Labor and Human Rights

At Bruker, we believe that our value chain should be free from human rights abuses as further specified in our Human Rights Policy. Bruker's supply chain management processes are designed to help establish, support, and continuously improve suppliers' adherence to basic human rights. In particular, suppliers shall respect the labor and human rights of their workers, and treat them with dignity and respect, in adherence to and compliance with global human rights standards as generally understood by the international community. Such standards include, but are not limited to, the requirements of:

- the ILO, the UN Universal Declaration of Human Rights and its Guiding Principal; and
- the 2015 UK Modern Slavery act.

Where applicable, we expect our suppliers to commit to legal requirements such as:

- the German Supply Chain Act of 2023 (LkSG);
- the California Transparency in Supply Chains Act of 2010; and
- the U.S. Customs and Border Protection Uyghur Forced Labor Prevention Act of 2021.

These requirements apply to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

Freely Chosen Employment

All forms of involuntary labor—including forced, coerced, bonded (including debt bondage), involuntary or exploitative prison, slavery, trafficked or indentured or other forms—are prohibited.

All work must be voluntary, and workers shall be free to resign at will.

- There shall be no unreasonable restrictions on workers' freedom of movement at the workplace or at company- or agent-provided housing.
- Employment agreements shall comply with local law, inform workers of their legal rights and employment conditions in a language understood by the worker, and be concluded before work has commenced. If employment contracts are not legally required, workers shall at least be informed of the terms and conditions of employment, in a language understood by them, prior to starting work.
- Workers shall not pay recruitment fees or other related expenses for their employment. If it is discovered that workers have paid fees, the supplier shall ensure that the workers are repaid in full.
- Employers and agents may not hold or otherwise deny access by employees to their identity or immigration documents unless such holdings are required by law.

Child Labor and Young Workers

Child labor shall not be used. The term "child" refers to any person under the age of 15, or under the minimum age for employment in the country, whichever is greatest. A child may help at their family's business only if they perform light work and meet the requirements described in the following paragraph.

All employment of young workers, including apprentices or vocational students, must comply with laws and regulations on the minimum working age and the compulsory age for schooling and must be of educational benefit. Young worker protections are in place, where applicable, so that young workers do not experience conditions in relation to their work that are mentally, physically, socially or morally dangerous or harmful, or that interfere with their schooling. The term "young worker" refers to any person under the age of 18.

Freedom of Association and Collective Bargaining

Suppliers shall respect workers' legal rights to freedom of association and collective bargaining.

Regular Employment Status

Work performed must be on the basis of a recognized employment relationship. Obligations to employees under labor or social security laws and regulations arising from a regular employment relationship shall not be avoided, such as through sub-contracting, exploitive use of fixed-term employment contracts, or through apprenticeship schemes with no real intent to impart skills or provide regular employment.

Basic Services & Accommodation

Workers shall have access to potable drinking water and clean toilet facilities at all times at the workplace and at any company- or third party-provided housing, as well as sanitary food preparation, storage and consumption areas. Accommodation, where provided, shall be clean, safe, meet the basic needs of workers, and conform to the laws of the country in which the accommodation is located. Accommodation should meet or exceed the basic levels afforded in the local community. Workers shall have freedom to enter and leave at will.

Humane Treatment & Anti-Discrimination

Suppliers will comply with all applicable labor and employment laws, treating their employees with dignity and respect. Suppliers will not threaten workers with or subject them to harsh and inhumane treatment, including, but not limited to, sexual harassment, sexual abuse, corporal punishment, threats of violence, mental or physical coercion or verbal abuse. And suppliers will not discriminate in hiring or employment practices on the basis of race, religion, age, national origin, or ethnic origin, sexual orientation, gender, gender identity, marital status, political affiliation or disability.

Wages, Benefits and Working Hours

Suppliers shall ensure workers receive wages and benefits that at least satisfy minimum requirements prescribed by local laws and regulation. Regular and overtime working hours must comply with applicable local law and the ILO standard:

- Regular working hours shall not exceed the legal limit or 48 hours per week, whichever is lower. This may be amended in unusual or emergency circumstances as long as within the boundaries of the ILO convention.
- Rest days shall comply with legal requirements or, in the absence of such a requirement, workers shall be provided one day off in seven. This may be amended in unusual or emergency circumstances.
- All overtime shall be voluntary.

Supply Chain Responsibility

Bruker advocates responsibility in supplier sourcing practices. Suppliers shall take all necessary and reasonable measures to ensure that all reporting to Bruker is in compliance with the provisions of all applicable laws and regulations, including any requests by Bruker for information.

In circumstances where the supplier is aware that it is using any "conflict materials" or "conflict minerals" as described in the US Dodd-Frank Act (and/or in the EU conflict minerals regulation 2017/821), the supplier must inform Bruker.

Health and Safety

Suppliers recognize that, in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input, education and training is essential to identifying and solving health and safety issues in the workplace.

Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Compliance with the following minimum standards is required:

- Adequate steps shall be taken to prevent accidents and injuries to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practical, the causes of hazards inherent in the work environment.
- Workers shall receive applicable health and safety training.
- Where needed, workers are to be provided—free of charge—with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.
- Suppliers shall respect workers' right to refuse unsafe work and to report unhealthy working conditions.
- Potential emergency situations and events (such as fires, earthquakes, and chemical exposures) are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures. In buildings, emergency exits must be unlocked and unblocked at all times.
- Adequate fire detection and suppression equipment.
- Building ventilation and egress.
- Emergency medical response resources.
- Industrial hygiene.

GOVERNANCE PRINCIPLES

Compliance with Law

Suppliers will comply with all applicable laws and regulations in all jurisdictions where they conduct business, including all applicable labor and employment, healthcare, medical, export control, environmental, safety, data privacy and tax and financial laws and regulations.

Anti-Corruption and Anti-Bribery / Gifts

Suppliers will comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and any other applicable national and international anti-corruption conventions. Without limiting the foregoing, suppliers shall not provide anything of value to representatives of any government or government-owned agency or entity for the purpose of gaining or retaining business, or otherwise obtaining an unfair business advantage. Suppliers will provide Bruker, upon request, with all documents and information reasonably required by Bruker to ensure compliance with anti-corruption and anti-bribery laws and regulations.

Additionally, suppliers shall not bribe or attempt to bribe, extort, or provide kickbacks or any other improper payment or inducement, including improper gifts, to any employee, representative or agent of Bruker.

Suppliers must also not accept a bribe, kickback or any other improper payment or inducement, including improper gifts, from any Bruker employee, representative or agent of Bruker. Any attempts at this type of activity must be immediately reported to Bruker.

Bruker values professional objectivity in our business relationships. Neither suppliers, nor any of their employees, shall offer any Bruker employee any gifts, gratuities or other favors before or while seeking to do business with Bruker. If any supplier pays for any meals or business entertainment for Bruker employees, it must ensure that the meal or entertainment is reasonable, not a regular event, not lavish and only for the purpose of conducting or discussing legitimate business matters and is properly handled for tax purposes.

Good Standing and Permissions

Suppliers must be in good standing and maintain good reputations. Neither suppliers nor their directors, shareholders or ultimate beneficiaries shall be subject to criminal or comparable administrative sanctions proceedings in connection with the improper conduct of business. Suppliers must be in possession of all required permissions and licenses to act for Bruker as a supplier. To the extent that a supplier's permissions or licenses lapse or are revoked, or the supplier or its directors, shareholders or affiliates become subject to criminal or comparable administrative sanctions proceedings, this shall be reported to Bruker immediately.

Transparent Ownership and Control Structure / No Tax Havens

All information provided by suppliers to Bruker and to any public registry on its ownership and control structure and ultimate beneficiaries, if any, shall be complete and accurate.

Open and Fair Competition

Bruker will not do business with suppliers who collaborate with their competitors to restrain competition or trade by engaging in activities like:

- agreeing to establish or maintain prices,
- dividing up markets, territories, or customers, or
- discussing the boycotting of a third party.

Suppliers shall not discuss any of these topics with a competitor, no matter how casually.

Suppliers shall endeavor to deal honestly, ethically, and fairly with their respective suppliers, customers, competitors and employees. Statements regarding their products and services shall not be untrue, misleading, deceptive, or fraudulent.

Export Sanctions / Terrorism Activities

Suppliers must abide by all applicable export control laws, economic sanctions, or trade embargoes, whether they apply to foreign countries, political organizations, or particular foreign individuals and entities.

Suppliers should not, directly, or indirectly, engage in or support any terrorist activity. Neither suppliers nor any of their affiliates, nor any officer or director of the supplier or any of its affiliates, should be included on any lists of terrorists or terrorist organizations, including but not limited to:

- the U.S. Treasury Department's Specially Designated Nationals List;
- the U.S. State Department's Terrorist Exclusion List; or
- the European Union List Implementing Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

Suppliers will provide Bruker, upon request, with all documents and information reasonably required by Bruker to ensure compliance with export control laws.

Payments and Accounts / Anti-Money-Laundering

Payments will be made and received by suppliers in their own name and on their own account using bank accounts in their own name only. Bank or payment accounts used will, without exception, be held with a credit institution or payment service provider in the country of each supplier's corporate domicile. Suppliers will comply with all organization, reporting and transparency rules set out by applicable tax and money laundering laws and regulations.

Conflicts of Interest

Any supplier which becomes aware of a conflict of interest must disclose the conflict to Bruker immediately. A conflict of interest occurs when the private interest of a Bruker employee or supplier improperly interferes, or appears to improperly interfere, with the interests of Bruker. Suppliers may reach out to Bruker's Compliance Officer via email to complianceofficer@bruker.com.

Confidentiality

Suppliers are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of Bruker's proprietary, confidential and personal information.

Examples of confidential information include, but are not limited to:

- trade secrets, intellectual property, security and other business practices or processes, policies or procedures or know-how;
- internal and external audit reports;
- non-public portions of examination reports and other reports or information filed with regulators;
- software, data processing programs, databases, and storage media;
- customer or supplier lists, telephone or other contact lists and other information about customers;
- customer presentations;
- information about employees of customers or suppliers, including personally identifiable information;
- cost, pricing or financial information;
- employee directories, lists, telephone numbers, or other information about employees;
- employee compensation, health or personnel records;
- business, strategic or marketing plans and research;
- information only posted on Bruker's internal websites;
- any information that is not readily available from a public source; and
- information that is shared between parties in confidence.

Insider Dealing / Trading

Buying or selling Bruker securities—such as stock or options—on the basis of information about Bruker that is both material and not publicly available is a violation of insider dealing / insider trading laws, and is strictly prohibited. Likewise, providing such insider information to any other person who buys or sells Bruker securities (a practice known as “tipping”) is prohibited. Engaging in insider dealing may subject Bruker, our suppliers, and individuals involved to criminal or civil liability.

In general, information is material if it would be considered important by a reasonable investor in

determining whether to buy, hold, or sell the stock of the company to which such information relates. Information is normally considered not to be public until two full trading days have passed since its public release. Insider information can be either positive or negative in nature, and includes, but is not limited to, the following examples:

- significant new products or discoveries,
- new business relationships,
- important changes in management, or
- news of a significant sale of assets.

A supplier that becomes aware of insider dealing by any person, must report it to Bruker immediately.

Social Media

Suppliers may not use any form of social media (e.g., Facebook, Twitter, YouTube, mobile app stores, blogs, Internet chatrooms, bulletin boards, social and business networking sites etc.) to discuss Bruker's business without advance written approval from Bruker.

Suppliers shall also not circulate, post or distribute (on the Internet or otherwise) any photo or video taken on Bruker's premises or at any work-related events without prior written approval from Bruker.

Data Protection and Information Security

Suppliers shall operate in a manner that is consistent with applicable data protection/privacy laws and aligned with industry standards for the protection and security of all information, including personal information (i.e., information that relates to an identified or identifiable individual, hereafter "Personal Information") about employees, business partners, consultants, and others.

Suppliers must (i) ensure that Personal Information is collected, processed, or used only for the legitimate purpose agreed upon or directed by Bruker; (ii) provide a transparent privacy notice to the persons concerned; (iii) obtain (where required) any necessary consents for the use or collection of Personal Information; (iv) ensure that the persons' rights under the applicable data protection/privacy laws are preserved; (v) have adequate safeguards, rules, and procedures to ensure that they remain in compliance with all applicable laws that govern cross-border data transmissions.

Suppliers will execute, upon request, a data processing or similar data protection agreement with Bruker.

Suppliers shall have the appropriate policies and procedures in place to ensure compliance with this section of the Code and ensure that any third party having access to Bruker Personal Information, including affiliates and suppliers, comply with such requirements, including entering into data processing agreements with any party that has access to or processes Bruker Personal Information on their behalf.

Suppliers shall take all reasonable measures to ensure that their systems have information security controls and protections appropriate to the Bruker data being processed, including Personal Information, and designed to minimize the risk of data breach. In the event of a suspected or actual cyberattack or data breach affecting Bruker information, including Personal Information, and infrastructure, suppliers must notify Bruker by sending an email to privacy@bruker.com within forty-eight (48) hours from the discovery of the breach, and shall cooperate with Bruker in the mitigation, investigation, and remediation of such data breach.

MANAGEMENT SYSTEMS

Supplier Relationships with Third Parties

Bruker expects and requires that its suppliers will take all reasonable measures and conduct sufficient due diligence to ensure that their own suppliers maintain an equally rigorous position on compliance. No supplier will ever participate indirectly in any activity prohibited by this Code by retaining a third party to perform the prohibited activity on behalf of the supplier, or by failing to properly discipline a third party found to have performed activities prohibited by this Code.

Traceability of the Supply Chain

Suppliers shall be able to disclose the country of origin for the primary materials for all deliveries made. Bruker reserves the right to ask suppliers for a full supply chain map in order to facilitate risk assessment and gauge compliance in the upstream supply chain, including disclosure of all known facilities used to produce goods or services for Bruker. At Bruker's request, suppliers are expected to provide to Bruker reports on the occurrence of substances in any materials supplied to Bruker that may be restricted by, or require disclosure to, governmental bodies, customers and/or other parties.

Accounting Records

Suppliers must maintain proper, complete, and accurate accounting records which comply with the laws and professional requirements of each jurisdiction in which they operate. Accounting records must not in any way be intentionally false or misleading.

Record Keeping

Suppliers must maintain documentation necessary to demonstrate compliance with this Code. Bruker shall have reasonable access to such documentation during normal business hours upon request.

Training

Suppliers are required to establish training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the content of this Code, the applicable laws and regulations and recognized standards.

Confidential Reporting

Bruker requires its suppliers to investigate all suspected violations of this Code and to report violations to Bruker immediately. Suppliers must provide channels for confidential complaint reporting to all their workers and must ensure that processes are in place to ensure that workers can raise concerns and speak up in a safe manner. In line with our strict non-retaliation policy for any reports made in good faith, we also expect suppliers to protect their workers from any form of retaliation.

Suppliers can raise any concern about misconduct in relation to legislation or regarding matters covered by this Code, by contacting Bruker's Compliance Officer via email at complianceofficer@bruker.com or by visiting Bruker's confidential reporting line "Bruker Integrity Line" at <https://bruker.integrityline.io/>. Reports can be made anonymously (if anonymity is permitted under local law). Bruker reserves the right to report violations of law to the responsible authorities.

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