



ver. 1.0

# Code of Business Conduct and Ethics



## CEO MESSAGE

Dear Fellow Accelerate Employees,

Our purpose as a company is clear: We deliver lifesaving answers for patients with serious infections.

To make a difference in the lives of patients, our mission is to expand our market leadership in Rapid ID/AST by delivering innovation with clear clinical and financial benefits for health systems and patients. It's a privilege to do this work, and we must do our work in a way that lives up to the profound nature of our Purpose while embodying our seven cultural beliefs set forth in this Code of Conduct. We must do business in a responsible and ethical manner, with the highest commitment to each other, our shareholders, our partners, our customers, and the patients we serve.

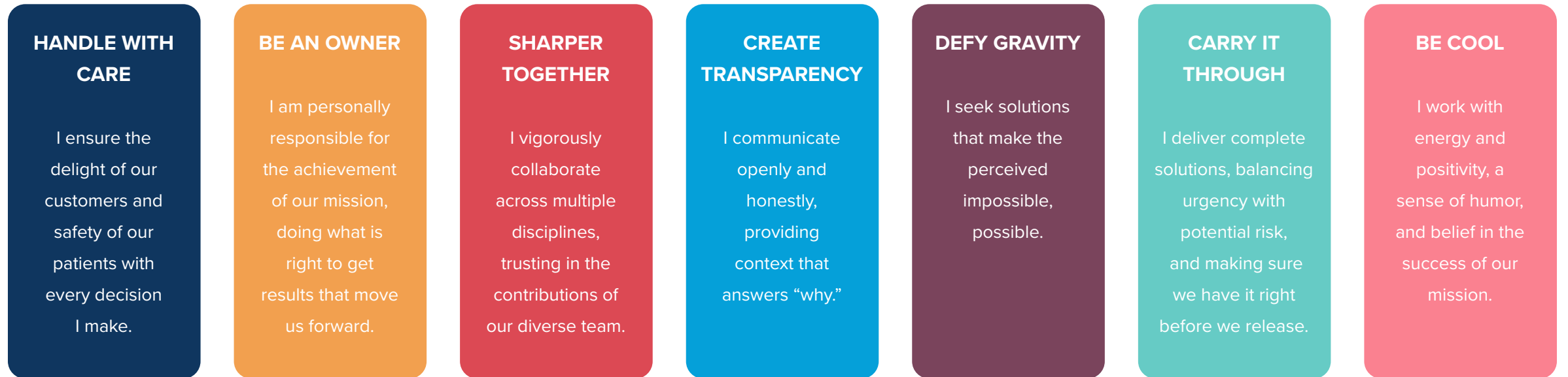
This Code of Conduct summarizes our responsibilities, aligned with our cultural beliefs, so every Accelerate employee understands the proper expectations that guide actions and decisions we make every day. All employees and members of the Company's Board of Directors must comply with the Code of Conduct.

Please give our Code of Conduct your careful attention. Thanks for your commitment to making Accelerate a great and fulfilling place to work.

Jack J. Phillips  
Chief Executive Officer

# CULTURAL BELIEFS

Our Cultural Beliefs are the foundation of our culture and the **framework for this Code of Conduct**



It is the responsibility of every officer, director, employee, consultant, and other business partner of Accelerate and its subsidiaries (individually and collectively, “Our People”) to always act with honesty and integrity, and to know, understand, and live by our Cultural Beliefs, this Code of Conduct, the policies that flow from them, and all applicable laws and regulations (individually and collectively, “Our Standards”).

# CONTENTS

*Our Cultural Beliefs are the foundation of our culture and the **framework for this Code of Conduct***

## **HANDLING WITH CARE WITHIN OUR CODE OF CONDUCT**

Quality & Patient Safety  
Healthcare Provider Relationships  
Import & Export Compliance

## **BEING AN OWNER WITHIN OUR CODE OF CONDUCT**

Customer and Patient Focus  
Insider Trading  
Anti-Bribery and Anti-Corruption  
Government Reimbursement and False Claims Act  
Interpretation and Amendments

## **BEING SHARPER TOGETHER WITHIN OUR CODE OF CONDUCT**

Respect in the Workplace  
Harassment and Discrimination  
Workplace and Employee Safety  
Speak Up

## **CREATING TRANSPARENCY WITHIN OUR CODE OF CONDUCT**

Financial Reporting  
Duty to Report and Cooperate  
Product Promotion  
Supplier and Contractor Relations  
Government Requests  
Monitoring and Remediation

## **DEFYING GRAVITY WITHIN OUR CODE OF CONDUCT**

Research and Development  
Intellectual Property  
Confidentiality  
Privacy and Personal Data  
Contributions and Giving

## **CARRYING IT THROUGH WITHIN OUR CODE OF CONDUCT**

Values Learning

## **BEING COOL WITHIN OUR CODE OF CONDUCT**

Social Events  
Social Media  
Outside Activities and Conflicts of Interests  
Systems and Solutions

QUALITY AND PATIENT SAFETY

HEALTHCARE PROVIDER RELATIONSHIPS

IMPORT AND EXPORT COMPLIANCE

### Quality and Patient Safety

Our commitment to Handling with Care extends to individuals outside of Accelerate who rely on products, information, and insights that we provide. Our Employees follow an established Quality System to ensure the safe and compliant development, production, and testing of our products. Accelerate is committed to meeting all regulatory requirements and promoting a culture of improving quality on a continual basis.

Accelerate is committed to understanding the safety profile of each of our products through the collection, review, and analysis of reports of product complaints, adverse events, and other information associated with the use of our products. In addition, adverse events and certain other safety information involving our products must be collected and reported to regulatory authorities within specific parameters and timelines. Accelerate is committed to complying with all applicable laws and regulations relating to adverse event reporting.

Reportable events may be learned in various ways, including phone calls, emails, social media, surveys, or casual conversations. A product complaint or adverse event must be reported promptly through the appropriate channels for evaluation/characterization.

**Q** A former colleague told me he had heard one of our products has safety issues. Do I really have to report this?

**A** Yes, you must report what you heard promptly through the appropriate channels for evaluation and characterization.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

QUALITY AND  
PATIENT SAFETY

HEALTHCARE  
PROVIDER RELATIONSHIPS

IMPORT AND EXPORT  
COMPLIANCE

### Healthcare Provider Relationships

The role of Accelerate is to discover, develop, and deliver new medical diagnostic products. We are not Healthcare Providers (“HCPs”). We do not practice medicine or interfere with medical care. We do not advise or consult on the diagnosis or treatment for an individual patient. We have implemented safeguards to maintain a clear distinction between the role of Accelerate and HCPs. Accordingly, our Employees must not represent themselves as employed by or associated with an HCP, and must not wear scrubs, lab coats, or HCP insignia in connection with promotion of our products or in-patient interactions.

Accelerate is dedicated to complying with all laws and regulations that place certain restrictions and reporting requirements on interactions the Company has with health care professionals and related organizations. Most notably in the United States, the Federal Physician Payment Sunshine Act requires the Company to annually report to the U.S. Centers for Medicare and Medicaid Services information about payments and other transfers of value that are provided to U.S. physicians and teaching hospitals. Payment types that are subject to reporting under this transparency law include, but are not limited to consulting fees, meals, travel, charitable donations, payments related to clinical trials and research, and physician educational materials. The Company is committed to fulfilling its obligations to track and report these payments and transfers of value as required by U.S. law.

We do not advise or consult on treatment for an individual patient.

QUALITY AND  
PATIENT SAFETY

HEALTHCARE  
PROVIDER RELATIONSHIPS

IMPORT AND EXPORT  
COMPLIANCE

### Import and Export Compliance

We comply with applicable standards governing the import, export, or transfer of products, technology, information, and services from one country to another. In some countries, these laws include embargoes, economic sanctions, and other trade restrictions that may prevent us from doing business in a certain country or may limit how we do business. US export control laws also contain provisions generally prohibiting US companies and their subsidiaries worldwide from cooperating in boycotts. The interplay of applicable laws is complex and frequently changing. When engaging in cross-border transactions on behalf of Accelerate, be sure to know and comply with Accelerate policies, including:

- » Do not ship products to a country that is the subject of US trade restrictions without the prior approval of Legal.
- » Report to Legal any actions or requests that may be related to such trade restrictions.
- » Comply with any limitations or procedures placed by Accelerate on doing business in a given country.
- » Do not agree to any terms that cooperate in the boycott of any country without the approval of Legal.

Provide accurate and complete information to relevant authorities where such information is required in connection with our import and export activities.

Contact Legal if you have any questions as to whether your proposed activities, relationships or agreements comply with applicable laws and regulations governing import and export controls, boycotts, trade embargoes, and sanctions.

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HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

CUSTOMER AND  
PATIENT FOCUS

INSIDER  
TRADING

ANTI-BRIBERY &  
ANTI-CORRUPTION

GOVERNMENT  
REIMBURSEMENT AND  
FALSE CLAIMS ACT

INTERPRETATION &  
AMENDMENTS

### Customer and Patient Focus

Every product we make and every service we provide is for our customers and their patients. Being an Owner means focusing on providing innovative, high-quality products and services and demonstrating integrity in every business interaction. Always apply Accelerate's principles of business conduct.

We do not just sell widgets at Accelerate. Our products can improve and even save people's lives. Remembering this basic fact can be motivating and rewarding.





CUSTOMER AND  
PATIENT FOCUSINSIDER  
TRADINGANTI-BRIBERY &  
ANTI-CORRUPTIONGOVERNMENT  
REIMBURSEMENT AND  
FALSE CLAIMS ACTINTERPRETATION &  
AMENDMENTS**Insider Trading**

Accelerate seeks to deliver novel medical diagnostic products for the benefit of patients and to return value to Employees and the shareholders who have supported our mission. All efforts to achieve these returns must be consistent with our Cultural Beliefs. Accordingly, our Employees are prohibited from buying or selling stock or other securities of any company while in possession of material, non-public information related to that company and from sharing such information, or making recommendations based on it, with others who may trade. The above restrictions apply to our Employees, immediate family, and household members and any trust, investment fund, retirement plan, company, or other entity over which they can influence or direct investment decisions.

Accelerate maintains robust policies and procedures that may, at any time, with or without notice, result in a decision to close a trading window or keep a trading window closed even when scheduled to be open. When in doubt, please consult with Legal.

To learn more, see Accelerate's *Insider Trading Policy*.

Insider trading is a crime with significant potential penalties.

CUSTOMER AND  
PATIENT FOCUSINSIDER  
TRADINGANTI-BRIBERY &  
ANTI-CORRUPTIONGOVERNMENT  
REIMBURSEMENT AND  
FALSE CLAIMS ACTINTERPRETATION &  
AMENDMENTS**Anti-Bribery & Anti-Corruption**

Bribery and corruption are antithetical to our Cultural Beliefs and to every provision of this Code of Conduct. We strictly prohibit bribes, kickbacks, illegal payments, or any offer of value that may inappropriately influence a person or business decision or seek an unfair business advantage.

Accelerate appreciates that every country prohibits bribery of its own officials and applauds global efforts to eradicate corruption. We comply with all implementing legislation of the Organization for Economic Cooperation and Development (“OECD”) Anti-bribery Convention, such as the Foreign Corrupt Practices Act (“FCPA”), and the UK Bribery.

Our Employees and others acting on our behalf must not offer, pay, promise to pay, or authorize the payment of anything of value – including money, gifts, and free or discounted services – to improperly influence the actions or decisions of any person or to gain an unfair business advantage.

Each of us must also be vigilant to identify warning signs of potential misconduct and report it immediately using the resources described in this Code of Conduct.

For further information, you should refer to our *Anti-corruption Policy* or contact Legal.

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CUSTOMER AND  
PATIENT FOCUSINSIDER  
TRADINGANTI-BRIBERY &  
ANTI-CORRUPTIONGOVERNMENT  
REIMBURSEMENT AND  
FALSE CLAIMS ACTINTERPRETATION &  
AMENDMENTS**Government Reimbursement and False Claims Act**

U.S. federal and state false claims acts and similar laws in other countries prohibit submitting a false claim or making a false record or statement in order to gain reimbursement from, and/or avoid an obligation to, a government-sponsored program, such as Medicare or Medicaid. We adhere to all applicable laws, regulations and program requirements when billing federal or state health care programs.

For further information, contact Legal.



CUSTOMER AND  
PATIENT FOCUSINSIDER  
TRADINGANTI-BRIBERY &  
ANTI-CORRUPTIONGOVERNMENT  
REIMBURSEMENT AND  
FALSE CLAIMS ACTINTERPRETATION &  
AMENDMENTS**Interpretation & Amendments**

Accelerate expects our Employees to champion our Culture Beliefs, this Code of Conduct, and the following guidelines and policies:

- » *Employee Handbook*
- » *Anti-corruption Policy*
- » *Insider Trading Policy*
- » *IT Policies*
- » Any other policies or procedures that can be found on the *AXDX Intranet*.

These guidelines amplify our Cultural Beliefs and inform the judgment of our Employees, which remains the biggest factor for execution consistent with our Cultural Beliefs and this Code of Conduct.

The Board or a designated Board committee is the final arbiter of interpretation and application of this Code of Conduct and must approve any revision of it. The Code of Conduct applies to our people from the Board to every employee.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

RESPECT IN  
THE WORKPLACE

HARASSMENT AND  
DISCRIMINATION

WORKPLACE &  
EMPLOYEE SAFETY

SPEAK  
UP

### Respect in the Workplace

At Accelerate, we are committed to building a workplace that puts people first. We strive to build high-performing and motivated teams that are committed to what we do and have our customers and patient's best interests in mind. This requires that we maintain a professional and constructive work environment in which our Employees may be fully productive and bring their best. We expect our employees to treat each other with respect, have open and honest conversations in the moment, value diversity and inclusivity, and maintain the highest standards of integrity.

We offer an employee experience full of opportunities to apply existing knowledge and to develop further. This includes a focus on culture and integration, opportunities for internal advancement and referral-based recruiting, prioritization of professional development, and competitive benefits. We expect our Employees to commit to living our Cultural Beliefs and upholding our standards.

We are sharper together if we treat one another with mutual respect, honesty, and openness.



HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

RESPECT IN  
THE WORKPLACE

HARASSMENT AND  
DISCRIMINATION

WORKPLACE &  
EMPLOYEE SAFETY

SPEAK  
UP

### Harassment and Discrimination

Accelerate promotes and values a diverse work environment where ideas may be exchanged freely. We appreciate differences and strive to ensure that our Employees are free from harassment and abuse in the workplace.

We are committed to maintaining a workplace free from verbal or physical conduct that creates an intimidating or hostile work environment, including sexual harassment or harassment based on an individual's protected personal characteristics.

We are an equal opportunity employer. We are also committed to making employment-related decisions based on merit and business considerations and without discrimination based on protected personal characteristics.

Protected personal characteristics include: age, race, ancestry, color, sex, national origin, sexual orientation, gender identity or expression, religious creed, mental or physical disability, pregnancy, genetic information, marital or civil union status, participation in the uniformed services of the United States, or any other characteristic protected under applicable federal, state or local law.

To learn more, refer to Accelerate's *Employee Handbook*.

**Q** A coworker told a derogatory joke in a group setting. Although most people do not appear to be offended, I am, and I think it violated our standards. What should I do?

**A** You may address the issue directly with your coworker if you feel comfortable do so, but it is also your responsibility to report this incident using the resources described in this Code of Conduct.

RESPECT IN  
THE WORKPLACEHARASSMENT AND  
DISCRIMINATIONWORKPLACE &  
EMPLOYEE SAFETYSPEAK  
UP**Workplace and Employee Safety**

The safety, security, and well-being of our Employees is essential to our mission. As part of our shared responsibility for security and a safe work environment, our Employees must follow health and safety laws, rules, and practices applicable to the locations where they work, including the following standards:

- » Substance abuse can pose serious health and safety hazards in the workplace. The use of illegal and recreational drugs and the misuse of alcohol, over-the-counter medications, and prescription drugs are prohibited. Alcohol may be provided or available during Accelerate-sponsored activities or events. If you choose to drink at these activities or events, we expect you to drink modestly and behave safely and responsibly.
- » Our concern for the safety and well-being of our Employees extends to their use of Accelerate-provided or funded vehicles and work-related driving. In these circumstances, Accelerate prohibits the use of computers, tablets, or handheld mobile devices while behind the wheel.
- » Firearms and other deadly weapons are not permitted on Accelerate's premises or at a Accelerate-sponsored event.

**Q** Do I have to report a minor injury at work? I don't think it's worth the hassle of reporting it.

**A** Yes, we do ask that you report any injury sustained in the workplace, even if you think it is minor. This is so we can ensure that you are ok, investigate what happened, and hopefully stop someone else.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

RESPECT IN  
THE WORKPLACE

HARASSMENT AND  
DISCRIMINATION

WORKPLACE &  
EMPLOYEE SAFETY

SPEAK  
UP

### Speak Up

Our Employees are encouraged to advance our culture of learning by proactively asking questions, seeking guidance, and making recommendations for improvements to business processes, training, and resources that support this Code of Conduct and the work we do.

Making the right decision is not always easy but Accelerate provides many resources to help. The best starting point for advice on issues related to our Code of Conduct will usually be an individual's manager. We recognize, however, that there may be times where our Employees may feel more comfortable with another avenue for addressing an issue. That is why we have many other resources available.

Our Employees have direct access to Human Resources, and Legal to communicate questions or concerns related to our Code of Conduct.





HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

FINANCIAL REPORTING

DUTY TO REPORT AND COOPERATE

PRODUCT PROMOTION

SUPPLIER AND CONTRACTOR RELATIONS

GOVERNMENT REQUESTS

MONITORING AND REMEDIATION

### Financial Reporting, Retention and Disclosure

As a public company, the integrity, reliability, and accuracy of Accelerate’s books, records, and accounts are fundamental to our continued success and shareholder trust. We keep detailed and accurate books and records that fairly represent the disposition of Accelerate assets and operational results.

Our Employees must never falsify any business record or create false or misleading documentation. This includes financial statements, time sheets, bills, invoices, expense reports, payroll records, benefits records, performance evaluations, and other forms and data used at Accelerate.

Accelerate’s public reports and documents must include fair, accurate, timely and understandable disclosure in all material respects. Our People who are responsible for these filings and disclosures, including Accelerate’s principal executive, financial, and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically, and objectively in this regard.

Similarly, our Employees who have responsibility for accounting and financial reporting matters must ensure that our accounting records and reports reflect all transactions, assets, liabilities, revenues, and expenses accurately, fairly and in reasonable detail. They must also ensure and that such records and reports comply with applicable laws and standards, including the Generally Accepted Accounting Principles (“GAAP”), and do not contain any materially false, or intentionally misleading entries.

Accelerate maintains and stores business records in compliance with legal, regulatory, contractual, and financial obligations and we maintain operational efficiency by allowing for the disposition of records that are no longer required to be maintained and are no longer needed for an ongoing business purpose.

The term “business records” refers to any documents created or received, or information captured during business activities no matter the medium, including hard and electronic copies of documents, e-mails, text messages, voice-mails, notes, audio and visual recordings, and photographs.

To enable us to comply with our internal standards and applicable laws in the management of our business records, Our People must:

- » Retain all business records for the time needed to comply with applicable retention schedules.
- » Do not delete, destroy, or alter any records, information or data that is required to be retained under a hold order from Legal.

FINANCIAL  
REPORTINGDUTY TO REPORT  
AND COOPERATEPRODUCT  
PROMOTIONSUPPLIER AND  
CONTRACTOR RELATIONSGOVERNMENT  
REQUESTSMONITORING AND  
REMEDATION**Duty to Report and Cooperate**

We encourage our Employees to speak up with questions and concerns and to be unafraid in doing so. We prohibit retaliation, including adverse employment actions, against any of our Employees who report suspected misconduct in good faith. Any person who participates in any such retaliation is subject to disciplinary action, up to and including termination.

Any of our Employees who know or suspect a violation of law or this Code of Conduct must promptly report it to Human Resources, the Legal, or using the Whistleblower Hotline at ***whistle@axdx.com***, which include options for anonymity where permitted by law. Confidentiality will be maintained to the fullest extent feasible. These resources must not be used in bad faith, in a false or frivolous manner, or to report grievances that are not related to this Code of Conduct. A member of our Board of Directors may also report questions or concerns directly to the Chairperson of the Board, or the Audit Committee.

Our People also must cooperate with the Company and tell the truth in any investigation related to this Code of Conduct.

**INVESTIGATIONS AND INSPECTIONS**

In our highly regulated industry, it is not uncommon to receive requests for information from government agencies. Accelerate has a responsibility to cooperate with government authorities with requests for information, facility visits, and inspections.

**Our people must:**

- » **Notify Legal immediately of any government complaint, investigation, subpoena, claim of non-compliance, notice of inspection, or non-routine request for information, unless an alternative notification process is established by Our Standards, and follow all other internal notification procedures applicable to your functional area.**
- » **Work with Legal to respond appropriately to requests for information from the government or other external parties.**
- » **Do not discuss an investigation, internally or externally, unless instructed to do so by senior management or Legal.**
- » **Cooperate fully and truthfully with all investigations and audits. Do not provide misleading information or omit information that has been requested. Do not guess or make up a response in providing information to the government.**
- » **Never create, alter, or destroy documents or records for purposes of impeding an investigation, inspection, or audit or when one is anticipated.**

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

FINANCIAL  
REPORTING

DUTY TO REPORT  
AND COOPERATE

PRODUCT  
PROMOTION

SUPPLIER AND  
CONTRACTOR RELATIONS

GOVERNMENT  
REQUESTS

MONITORING AND  
REMEDIAION

### Product Promotion

The well-being of patients may be impacted by how we communicate about our products. We intend for our promotional discussions, information, and materials to be accurate and not misleading, and to comply with all applicable laws, regulations, and industry codes.

What this means for our Employees is...

- » We only promote a product in countries where it has been approved by the relevant regulatory authority and only for specific uses in accordance with its approved labeling.
- » We are committed to fair balance. We do not overstate the efficacy of our products or minimize or misrepresent the risks or safety information associated with our products.
- » We do not make any false, misleading, unfairly denigrating, or disparaging statements about a competitor's product.
- » We use only promotional materials and messages that have been approved for the relevant use.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

FINANCIAL  
REPORTING

DUTY TO REPORT  
AND COOPERATE

PRODUCT  
PROMOTION

SUPPLIER AND  
CONTRACTOR RELATIONS

GOVERNMENT  
REQUESTS

MONITORING AND  
REMEDATION

### Supplier and Contractor Relations

Accelerate must maintain a consistent and favorable relationship with quality suppliers, distributors, and contractors. To this end, we are committed to a policy of openness and honesty about tender, purchase, payment, receipt, use, and cancellation/return of supplies, distribution of its products, or contracted services. In return, Accelerate seeks and expects a commitment to total value, considering price, specifications, technology, reliability, information security, safety, service, delivery and environmental performance.

Employees should always observe the following standards with all partner organizations to Accelerate:

- » Never make misrepresentations or dishonest statements.
- » In deciding among competing companies, weigh all the facts to determine the best business partner.
- » Whether in a position to influence decisions involving the evaluation or selection of a business partner or not, do not exert or attempt to influence to obtain “special treatment” for a particular business partner. Even to appear to do so can undermine the integrity of our established procedures.
- » Receiving business gifts, including the acceptance of meals and transportation, of nominal value is permissible where customary. Receiving cash or gifts of significant value is strictly prohibited. Customary business entertainment, including meals or transportation, is proper unless the value, cost, or frequency of the business entertainment is such that it could be interpreted as affecting an otherwise objective business decision. When determining if a gift could be interpreted as affecting an employee’s otherwise objective business decision, the position of the employee and whether the employee is or could be in a position to influence Accelerate’s relationship with the competitor, supplier, or customer will be taken into account.
- » Act with the highest ethical standards and in line with Accelerate’s Anti-Corruption Policy.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

FINANCIAL REPORTING

DUTY TO REPORT AND COOPERATE

PRODUCT PROMOTION

SUPPLIER AND CONTRACTOR RELATIONS

GOVERNMENT REQUESTS

MONITORING AND REMEDIATION

### Government Requests

It is our policy to cooperate with reasonable requests for information from government agencies and regulators. All Employees are required to notify Legal before responding on behalf of the Company to a government notice, subpoena, search warrant, request for an interview or other non-routine request for access to information related to Company matters. Employees should always cooperate fully and be truthful in any information provided to the government. Employees may not alter, withhold or destroy records related to an investigation.



HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

FINANCIAL  
REPORTING

DUTY TO REPORT  
AND COOPERATE

PRODUCT  
PROMOTION

SUPPLIER AND  
CONTRACTOR RELATIONS

GOVERNMENT  
REQUESTS

MONITORING AND  
REMEDATION

### Monitoring and Remediation

The Small Team, under the supervision of the Board of Directors, monitors compliance with this Code of Conduct to identify opportunities for continuous improvement and, when appropriate, imposes remedial and disciplinary measures for violations. Such measures will be determined in Accelerate's sole discretion and may include counseling, re-training, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution, among other measures.

The Leadership Team periodically reports to the Board of Directors or the appropriate Board committee on the compliance program related to this Code of Conduct, including alleged violations and remedial or disciplinary measures.



RESEARCH AND  
DEVELOPMENTINTELLECTUAL  
PROPERTY

CONFIDENTIALITY

PRIVACY AND  
PERSONAL DATACONTRIBUTIONS  
AND GIVING**Workplace and Employee Safety**

The safety, security, and well-being of our Employees is essential to our mission. As part of our shared responsibility for security and a safe work environment, our Employees must follow health and safety laws, rules, and practices applicable to the locations where they work, including the following standards:

- » Substance abuse can pose serious health and safety hazards in the workplace. The use of illegal and recreational drugs and the misuse of alcohol, over-the-counter medications, and prescription drugs are prohibited. Alcohol may be provided or available during Accelerate-sponsored activities or events. If you choose to drink at these activities or events, we expect you to drink modestly and behave safely and responsibly.
- » Our concern for the safety and well-being of our Employees extends to their use of Accelerate-provided or funded vehicles and work-related driving. In these circumstances, Accelerate prohibits the use of computers, tablets, or handheld mobile devices while behind the wheel.
- » Firearms and other deadly weapons are not permitted on Accelerate's premises or at a Accelerate-sponsored event.

**Q** An employee mentioned that she sometimes adds dates or adjusts information to make Accelerate-related files appear complete. She may have been joking. What should I do?

**A** Upholding the integrity of our records is a serious issue. Unfortunately, whether the employee was joking will now require appropriate investigation. It is your responsibility to report this matter to your manager or Functional Head, and to the Head of Quality and Regulatory.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

RESEARCH AND DEVELOPMENT

INTELLECTUAL PROPERTY

CONFIDENTIALITY

PRIVACY AND PERSONAL DATA

CONTRIBUTIONS AND GIVING

## Intellectual Property

Innovation is key to Accelerate's success. The transformative nature of Accelerate's innovation leads to a robust and valuable portfolio of intellectual property. Intellectual property includes copyrights, patents, trademarks, product and package designs, brand names and logos, ideas, strategies, data and results, inventions, and trade secrets. Our continued success depends on our Employees and on the protection of our intellectual property. We also respect the intellectual property rights of third parties. Be alert to possible infringement of Accelerate's intellectual property rights and bring any possible infringements directly to Legal.

For any questions about our intellectual property, please contact Legal.

Accelerate has an **INTELLECTUAL PROPERTY COMMITTEE** that is responsible for developing and protecting our intellectual property.





RESEARCH AND  
DEVELOPMENTINTELLECTUAL  
PROPERTY

CONFIDENTIALITY

PRIVACY AND  
PERSONAL DATACONTRIBUTIONS  
AND GIVING**Confidentiality**

Our Employees must not disclose Accelerate's confidential information to others, internally or externally, unless authorized to do so and must:

- » Obtain an appropriate nondisclosure agreement or other confidentiality provisions in a form approved by Legal before disclosing confidential information outside of Accelerate.
- » Respect the rights of our customers, vendors, and other third parties who share their confidential information with us by protecting their confidential information as we do our own.
- » Take precautions to prevent inadvertent disclosure of Accelerate confidential information, including by avoiding discussions in public places or anywhere else where others may overhear.
- » Continue to safeguard Accelerate confidential information after leaving Accelerate.
- » Not disclose, upload to our systems, or use as part of Accelerate -related work any confidential information of a previous employer or that you otherwise obtained under a confidential relationship not related to Accelerate.

Intelligence about other companies, if collected by lawful and ethical means, may be a valuable source of information. We expect that our Employees with relevant, job-related duties will only use ethical and legal means to gather business intelligence.

To ensure that we achieve these standards:

- » Never use, or ask a third party to use, unlawful or unethical means to obtain business intelligence. Examples of unethical means include any form of misrepresentation, deception, theft, bribery, or encouraging or soliciting breach of a confidentiality obligation to gather competitive intelligence.
- » Do not use or disclose to any Accelerate employee or vendor any confidential information you learned while employed by another company. Do not use any such information in connection with any Accelerate-related activities.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

RESEARCH AND  
DEVELOPMENT

INTELLECTUAL  
PROPERTY

CONFIDENTIALITY

PRIVACY AND  
PERSONAL DATA

CONTRIBUTIONS  
AND GIVING

### Privacy and Personal Data

Accelerate is committed to the protection of private information and ensuring that it is used solely as authorized and in accordance with all applicable laws and regulations.

Our Employees Must:

- » Collect private information only where there is a legitimate business need, and only as permitted under applicable laws.
- » Obtain consent for the collection and use of private information, as required.
- » Take precautions to safeguard private information and share it only as permitted.
- » Where required under local laws, allow individuals whose private information is collected to review and correct the information.
- » Destroy private information once its purpose has been fulfilled and in accordance with the Company's records retention policies and schedules.

To learn more about private and personal data, please contact Legal.

Provide accurate and complete information to relevant authorities where such information is required in connection with our import and export activities.

HANDLING WITH CARE

BEING AN OWNER

BEING SHARPER TOGETHER

CREATING TRANSPARENCY

DEFYING GRAVITY

CARRYING IT THROUGH

BEING COOL

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### Contributions and Giving

Accelerate generally does not, directly or indirectly, make contributions or payments or otherwise give any endorsement of support that would be considered a contribution to political parties or candidates. This includes contributions made through intermediary organizations, such as political action committees or campaign funds. Employees must not make any such contributions as a representative of Accelerate.

Both within the U.S. and around the world, direct or indirect contributions to any government officials (including their representatives or family members) that are intended to gain preferential treatment for our Company are always prohibited. For additional information, please refer to the Accelerate Anti-Corruption Policy.

Our Employees are free to donate time, money, and resources to causes they care about, including supporting political candidates and making personal campaign contributions provided that such activities are legal, done in an individual capacity, and not attributed to Accelerate. Personal political views and activities are not those of the Company. Any political contributions proposed to be made with Accelerate funds must be coordinated through and approved by the General Counsel.

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### Values Learning

Accelerate seeks to be a community of lifelong learners and agents of change. These attributes exude across Accelerate and is reflected in our science, our products, and in our relationships with stakeholders who are aligned to our mission. It is also our approach to this Code of Conduct.

This Code of Conduct is a statement of our culture and the way we do business. It is a public statement, the latest version of which is available **here**. In addition, Our People are provided with a copy of the Code when they join Accelerate and each time it is revised. A copy of the Code is also available from Human Resources. This Code of Conduct is the subject of an annual, mandatory learning experience for all our Employees.



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SOCIAL  
EVENTS

SOCIAL  
MEDIA

OUTSIDE ACTIVITIES AND  
CONFLICTS OF INTEREST

SYSTEMS AND  
SOLUTIONS

### Social Events

Accelerate celebrates. We bring people together to acknowledge work that exemplifies our Cultural Beliefs, to relish milestones that advance our vision, and to appreciate the work of our Employees. Given that these events are about our Cultural Beliefs, our vision, and our Employees, we are vigilant to remove and sanction any conduct that is contrary to our Cultural Beliefs. Harassment, violence, and unsafe activities are never tolerated at Accelerate, including at related social events.



SOCIAL  
EVENTSSOCIAL  
MEDIAOUTSIDE ACTIVITIES AND  
CONFLICTS OF INTERESTSYSTEMS AND  
SOLUTIONS**Social Media**

Accelerate embraces Social Media to communicate and celebrate. Our Employees are encouraged to discuss their passion for working at Accelerate and their work experiences in ways consistent with our Cultural Beliefs and this Code of Conduct. In the highly regulated environment in which we work, there are significant limitations on posts related to our products, programs, research and development activities, and performance. On these subjects, Our Employees are not authorized to generate their own posts, add comments, or alter the content of official Accelerate posts that they are permitted to share. Employees should not post any proprietary and nonpublic information of the Company or its customers. We are mindful that a post by any one of our Employees may impact the way others view all of Accelerate.

To learn more, refer to our *Employee Handbook*.

Use good judgment when posting on Social Media. Remember you are not anonymous on Social Media.



SOCIAL  
EVENTSSOCIAL  
MEDIAOUTSIDE ACTIVITIES AND  
CONFLICTS OF INTERESTSYSTEMS AND  
SOLUTIONS**Outside Activities and Conflicts of Interest**

Accelerate encourages our Employees to be involved in their communities and other outside activities. We recognize that life outside of Accelerate is essential to bringing our best to work. We also recognize that being one of our Employees is a commitment. It requires a willingness to prioritize Accelerate's objectives over certain personal opportunities. We expect our Employees to proactively inform their manager or Human Resources if they, their immediate family, or a household member is involved in certain activities that may intersect with Accelerate's interests, so steps can be taken to avoid the opportunity for, or perception of, a conflict of interest while maintaining the spirit of community engagement.

A potential conflict of interest occurs when personal, financial, or other outside interests might interfere with Accelerate's interests or with decision-making on behalf of Accelerate. Even the appearance of a conflict of interest can damage reputations. Our Employees must never place social, financial, or political interests above the interests of Accelerate.

**Q** A former college roommate just contacted me and said that she is an owner in a consulting business that is under consideration for work with Accelerate. We are not that close anymore. It's been years since I talked to her. Do I have to disclose this? I don't want to hurt her chances of getting the business.

**A** Yes. You should disclose any relationship that could be perceived as a potential conflict of interest. Disclosing a potential conflict does not mean that the relationship or transaction will not be allowed. It means that it will be reviewed and managed with safeguards to avoid the appearance of impropriety.

SOCIAL  
EVENTSSOCIAL  
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CONFLICTS OF INTERESTSYSTEMS AND  
SOLUTIONS**Systems and Solutions**

Accelerate uses technology to drive innovation. We provide our Employees with the tools and systems needed for their work and offer additional opportunities for individualized technology to support the various work preferences. We also permit incidental personal use of our technology that is consistent with this Code of Conduct, does not interfere with job performance, and does not incur additional cost for Accelerate. Our systems and solutions are the property of Accelerate and should be used primarily for company business.

Accelerate systems and solutions should not be used to create, send, or display any inappropriate, offensive, illegal, defamatory or disruptive materials or other materials that violate this Code of Conduct.

- » Any technology used by our Employees in performance of their work, whether company-issued or personally-owned, must be used in accordance with prescribed security procedures to protect information from cyber threats and potential loss. Our Employees must immediately inform Information Technologies if a work-related device or information may have been compromised.
- » There may be circumstances when Accelerate may, for business reasons, in its sole discretion, inspect the work-related files, records, drives, e-mails, voice-mail messages, text messages, and Accelerate telephone records of our Employees, no matter where they are located, and may monitor their computer or Internet use, in each case at any time without advance notice or consent unless legally required.
- » “Accelerate systems and solutions” refers to computers, laptops, tablets, phones, e-mail, voice-mail, networks, drives, Internet access and other systems and hardware provided by Accelerate, the work-related records, files and information stored on them and information related to their use.

To learn more, see *Systems & Apps* on the AXDX Intranet.

Provide accurate and complete information to relevant authorities where such information is required in connection with our import and export activities.