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**CODE OF CONDUCT**

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**CURETIS N.V.**

**Adopted by the Management Board on 29 March 2018**

**Approved by the Supervisory Board on 29 March 2018**

## **1. INTRODUCTION AND SCOPE**

This Code of Conduct is established pursuant to best practice provision 2.5.2 of the Dutch Corporate Governance Code. Curetis N.V. (the "Company") has laid down its business principles in this Code of Conduct. The Code of Conduct applies to each person throughout the Company's group, including Management Board members, Supervisory Board members, employees and officers and, where applicable, third parties such as agents, advisers, consultants, work-experience students, secondees, temps and other third parties designated as such by the Company, each referred to as employee and jointly referred to as employees. The Code of Conduct provides a minimum standard for the conduct of our employees. We have adopted several internal policies to further elaborate on any prohibitions and obligations that may apply.

## **2. CULTURE**

At the Company we share the value of “we do what’s right” and that guides daily interactions, formal as well as informal communications, our actions and the way we do business. At the Company we have an open door policy, shared team offices with our Management Board members being an integral part of their respective teams. Communication styles are very open, informal, on a first name basis, direct and always guided by the highest levels of respect for any individual member of the Company's team. Despite all of this we are highly results focused and outcomes oriented, with a pioneering spirit and pragmatic actions to achieve the best possible solutions for our customers and partners. The Company also has a deliberate culture that encourages calculated risk taking, recognizes that failure is an inherent and indispensable component in our operations, R&D, clinical work, commercial approach and all support functions. We strive to learn from failures and share best practices across the entire organization to make sure we all learn from each other and achieve continuous improvement in all aspects of our company and thus create long-term value for the Company.

## **3. INTEGRITY**

Integrity of the Company starts with the integrity of each single employee, including as well Management Board and Supervisory Board members. We must be aware of applicable laws, regulations and internal policies that the Company has adopted as a benchmark for integrity.

## **4. RESPECT**

We respect everyone at every level of our business. We communicate openly and fairly with each other. We value our diverse and talented employees and support them so that they can contribute to their full potential. There is a zero-tolerance policy for any level of disrespect at any level of the organization.

Our relationships with our customers, our collaboration partners, our shareholders, our communities and each other reflect this respect.

## **5. DIVERSITY AND ANTI-DISCRIMINATION**

We encourage a diverse workforce, which not only applies to our “normal” staff, but also to our Management and Supervisory Board members. With their diversity come unique ideas, viewpoints, talents and values that directly contribute to our success.

We respect the personal dignity, privacy, and personal rights of every individual. We work together with individuals of various ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual identity, world view and gender. Consistent with our values and with the employment laws of the countries in which we operate, we do not tolerate discrimination against anyone on the basis of any of these characteristics or any other comparably offensive behavior. These principles extend to all employment decisions including recruiting, training, evaluation, promotion and compensation.

We all have the right to work in an environment free from harassment. “Harassment” is a form of discrimination that consists of unwelcome behavior that has the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassment can come in many forms, including physical actions, verbal or written remarks, or visual depictions. The Company strictly prohibits any acts of harassment by persons this Code of Conduct applies to.

## **6. HEALTH, SAFETY AND ENVIRONMENT**

Providing a safe workplace for all employees and meeting its environmental responsibilities are high priorities for the Company.

Health and safety is an integral part of our business activities. Accordingly, our employees have the duty to adhere to health and safety measures, to attend related trainings and to follow the relevant regulations and work instructions, and to use the protective clothing, gear or equipment as required by law and the Company's policies.

For the good of our planet and future generations, we act as stewards of our environment. At all times, we must strive to meet, if not exceed, all applicable legal and regulatory requirements, as well as internationally accepted environmental standards.

## **7. PRODUCT QUALITY**

We are committed to establishing and maintaining the highest standards of product quality and safety. Our careful attention to product quality has a direct and substantial effect on our reputation and performance, and allows us to meet or exceed our customers’ expectations, as well as the expectations of those who rely on our products. We must never compromise on quality and have committed to making this part of our corporate DNA in observance of our Quality Policy.

We must always properly perform all required and approved testing procedures to meet our regulatory requirements, and the documentation in support of that testing must be accurate and complete. There must be no unauthorized changes in the testing requirements or false or inaccurate documentation concerning testing or manufacturing.

## **8. CONFLICT OF INTEREST**

We should prevent any (appearance of a) conflict of interest. If someone suspects a possible conflict of interest or if a conflict of interest has materialised, the respective person should inform the Compliance Officer immediately. Together we will then find an adequate solution to the situation.

## **9. POLICY ON INSIDER TRADING**

The Policy on Insider Trading contains the code of conduct in respect of the applicable insider

trading rules and reporting obligations pursuant to the Dutch Financial Supervision Act (*Wet op het financieel toezicht*) in respect of transactions in financial instruments issued by the Company.

The Policy on Insider Trading aims to raise and maintain each employees' awareness about the prohibition of trading securities with inside information and the related prohibitions in accordance with the Dutch Financial Supervision Act and the codes applicable to us.

Reason is to limit any risk to the Company's reputation and the integrity of its business as a result of undesirable transactions.

The Policy on Insider Trading is available on the Company's website, [www.curetis.com](http://www.curetis.com).

#### **10. GIFTS**

No gift, favour or form of entertainment should be accepted or provided if it will obligate or reasonably appear to obligate the person receiving it. If in doubt seek clarification from the Compliance Officer or your superior.

#### **11. HONEST AND ETHICAL CONDUCT**

We all shall comply with all applicable laws, regulations and internal policies. Together we are responsible for ensuring the honest and ethical conduct of business at the Company under our "we do what's right" motto. Each of us has the right but also the responsibility to report any abuse or reasonable suspicion of it, without jeopardising his or her legal position.

#### **12. BEST PRACTICE STANDARDS**

The Company is aware that not only laws and regulations stipulated by governments and multinational institutions are setting minimum levels of required business conduct. As an active player in the IVD / MDx sector we also carefully analyze relevant standards such as the "Kodex für die Mitglieder des VDGH, die IVD-Medizinprodukte nach § 3 Nr. 5 MPG herstellen, die auch zur Eigenanwendung bestimmt sind (Eigenanwendungs-IVD)".

These codes of various associations describe in essence the ethical and lawful relationship with healthcare professionals and institutions, the appropriate marketing of IVD products, accuracy and objectivity of scientific information as well as transparency for clinical studies.

The Company fully commits to transparency and integrity in relationships between the IVD / MDx sector and specific third parties such as physicians, nurses, lab technicians, teaching hospitals, community hospitals, clinical reference laboratories, guideline commissions or scientific research organizations.

#### **13. USE OF CORPORATE ASSETS**

Company's assets and services are solely for legitimate business purposes and not for any personal benefit or the personal benefit of others, unless expressly approved.

#### **14. PROTECTION OF COMPANY ASSETS**

We have the responsibility and legal duty to protect all physical, intellectual property, and financial assets of the Company. They are essential to help us achieving our ambitious business objectives.

At the Company, we regularly generate valuable, non-public ideas, strategies and other kinds of business information, which we own and need to protect as intellectual property. Such information is a large part of what gives us our competitive advantage in the diagnostic business environment.

In addition, it is our responsibility to protect confidential information entrusted to us by our customers, collaboration partners, suppliers and other business partners as carefully as we protect our own information or at the level specified in confidentiality agreements with such partners.

The Company's physical assets, such as equipment, raw materials, products and research facilities, are instrumental to performing our day-to-day business operations.

We all are responsible for using good judgment to ensure that physical assets, intellectual property, and financial assets are not damaged, stolen, misused or wasted.

**15. MEDIA**

All media inquiries should be directed to the designated spokesperson(s) and Management Board members. No information relating to the Company shall be communicated on (social) media without prior written approval. Please check the social media policy for further guidance on this topic.

**16. MISCELLANEOUS**

The Company reserves the right to amend or alter this Code of Conduct at any time.

This Code of Conduct shall be published on the Company's website, [www.curetis.com](http://www.curetis.com).