



Code of Conduct

April 1, 2024

“At Solventum, integrity, ethical business practices and patient safety are core to our DNA and culture. We will compete to win as an organization. But we will do it the right way and patient safety will always come before company profits.”

Bryan Hanson
Chief Executive Officer

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Introduction to our culture of ethics

At Solventum, we act with honesty and integrity inside and outside the work environment, providing safe, effective, and innovative products and services for customers globally in the healthcare sector and beyond. Our employees are expected to act with high ethical standards, always follow our Code of Conduct and internal policies, comply with the law in every location we operate, be a steward of Solventum and uphold our reputation globally, creating a competitive advantage for our organization and winning with excellence.

How we do business builds trust among our employees, business partners and shareholders. Ethics and compliance at an individual and corporate level are at the forefront of everything we do. Our commitment to honesty and integrity is demonstrated through our reputation for providing quality products and services, engaging in honest and ethical dealings, and making the right choices for our organization, our customers, and the communities in which we operate.

The code is the ethical foundation of our business, setting the tone for the organization's identity, as well as for our detailed policies, standards and procedures, which guide and govern how we do business everywhere, every day. By living our code, we create an inclusive workplace, where each of us contributes to Solventum's mission and upholds its values.

Our mission: Enabling better, smarter, safer healthcare to improve lives

Our values:

Put people first

We value our team members first and foremost and then extend this empathy and respect to the world around us. This creates positive change for our stakeholders, and most importantly, the people and patients our innovations help every day.

Win with excellence

We set high standards for ourselves and work hard to exceed them. By bringing quality, reliability and integrity to the way we work, we ensure patient safety and compliance while achieving exceptional results for the people we serve.

Solve what matters

Fueled by bold ambition and unique capabilities, we push ourselves to think in different ways, to learn and listen closely to what our customers need most. With this clear focus we create innovative solutions that shape the future of health.

Advance together

We act swiftly and skillfully as one team, collaborating across the organization to anticipate and create solutions that meet our customers' most important needs.

Live with heart

We believe in changing the world for the better. Driven by a desire to make an impact on the countless lives, we look for opportunities to bring our kindness, talent and expertise to serve our communities and those in need.

Our success depends on our integrity and embracing personal responsibility to speak up where something may not be quite right.

Ethical decision making

We are all expected to use our best judgment to make decisions every day. This means following the Code of Conduct, upholding Solventum's reputation for conducting business ethically, and making decisions that can withstand external scrutiny. Where a conflict between the code and local law exists, we must always follow the law and do what is right to protect the reputation of Solventum. Making the right choice might not be clear in all circumstances, but our code provides guidance for making the right ethical choice.

If you are not certain if an activity would be consistent with our code, ask yourself the following questions:

- Is this conduct legal?
- Would this conduct build upon the reputation of Solventum?
- Would this conduct reflect well on Solventum if it were to appear in the media?

Speak up

Ask questions and raise concerns. If you find yourself in a situation where the right course of action is not clear, remember you are not alone. There are a number of resources available that can provide you with assistance.

If you see or know of any misconduct, by yourself, by other employees or others, or by someone acting on our behalf, you have a responsibility to report the issue, unless prohibited by local law. To make a report, you can contact any of the following resources in no particular order:

- Your manager or supervisor
- Your assigned Human Resources Manager
- Solventum Legal Counsel
- Solventum Ethics & Compliance
- [SolventumEthics.com](https://www.solventumethics.com) (anonymous reporting available, where allowed by law)
- Solventum Corporate Audit Department

By asking questions and reporting potential problems, you are helping Solventum succeed.

The confidentiality of all reported concerns will be maintained in accordance with legal requirements and in the best interest of the organization and those involved.

Leadership's responsibilities

Managers and supervisors play a key role in Solventum's ethical culture. If you lead or supervise others, you have additional responsibilities, including:

1. Setting the tone and acting as an ethical role model for everyone around you.
2. Creating an environment that encourages asking questions and raising concerns.
3. Supporting your employees' timely completion of compliance training courses and certification to the Code of Conduct.
4. Listening and reporting concerns appropriately, escalating them as needed.
5. Doing your part to create a fair and respectful workplace.

Investigations

Solventum takes all reported concerns about business conduct seriously. Each concern will be thoroughly reviewed, and investigations will be conducted when necessary. Violations of the Code of Conduct and Solventum's underlying policies, standards, and procedures or the law will be grounds for discipline, up to and including termination.

Non-retaliation

Solventum does not tolerate retaliation for anyone who raises a genuine concern. We support honest, open communication, and encourage our employees to ask questions and report concerns in good faith. We do not tolerate retaliation against any employee who discloses actual or suspected business conduct violations or participates in a company investigation. Complaints of retaliation will be investigated promptly and corrective action, if appropriate, will be taken.

Living our code

Respectful work environment

Solventum recognizes that a mix of backgrounds, opinions, and talents in our global workforce enriches our company and helps us succeed. “Diversity” may include personalities, lifestyles, thought processes, work experiences, ethnicity, race, color, religion, age, disability, sex, gender identity, sexual orientation, marital status, genetic information, pregnancy, national origin, citizen status, veteran status, or other characteristics that are uniquely identifying or legally protected. We will better understand the needs of our customers and foster innovation if each of us embraces diversity and inclusion in all aspects of our business.

We strive to promote and maintain a culture in which people of all backgrounds, capabilities, and opinions are treated with fairness, respect, dignity, and courtesy. We support diversity and are committed to equal employment opportunity and will not tolerate unlawful discrimination based on protected characteristics.

We are also committed to maintaining a work environment free from harassment, intimidation, and offensive behavior. If you experience or witness these behaviors, you have a responsibility to voice your concerns.

- Treat each other with dignity and respect.
- Make employment decisions that involve recruiting, hiring, training, promoting, compensating employees, or any other terms or conditions of employment based on business-relevant factors and without regard to any legally protected status in each of the countries in which we operate.
- Recognize people for their contributions and provide timely, open, and honest performance feedback.
- Maintain a work environment that is free from unlawful harassment and disrespectful conduct toward co-workers or business partners.

Environmental, health & safety

When we protect employees, neighbors, and the environment, we promote positive business practices that contribute to better performance by protecting and developing human and physical resources and by reducing costs.

We are responsible for working together to promote a safe and healthy workplace, while also partnering with our employees, suppliers, and the communities in which we operate to be good environmental stewards.

Here is guidance that you can use to do what’s right:

- Comply with local operating procedures and safe working practices.
- Report injuries and ill health arising from your work immediately.
- Take steps to prevent accidents – be attentive to safety.
- Conserve resources and promote sustainable practices.
- Comply with all applicable government requirements.

Drug-free workplace

Drug and/or alcohol abuse adversely affect productivity, work quality and dependability, as well as pose a significant threat to the safety, security and welfare of the company, its employees, customers, vendors, and the general public. Such abuse can also affect an employee's opportunity for advancement and successful employment. Maintaining a drug-free workplace is right because it supports our mutual success that is not compromised by substance abusers.

We are committed to providing and maintaining a workplace that is safe, healthy, productive, and free from the effects of alcohol, illegal drugs, and prescription medications either used inconsistent with the prescription or that impair your ability to work safely.

Your wellbeing is especially important, as is the safety of others. Contact Solventum's Employee Assistance Program if you have concerns about your drug or alcohol use. This is a free and confidential resource.

Human rights/Human trafficking

We promote safe and healthy human rights work practices and prohibit forced labor, child labor, slavery, and human trafficking.

We are committed to complying with all laws regarding labor, employment, and human rights and taking appropriate steps to maintain compliance within our business and supply chains, including:

- Follow corporate requirements and guidance related to human rights and human trafficking.
- Hire reputable third-party business partners who share our commitment to safe and healthy work practices.
- Report any concerns about any human rights violations.
- Respect workers' freedom of association.

Citizenship and society

Solventum recognizes the rights of itself and its employees to engage as citizens in the communities in which it operates. Active engagement and participation contribute to a free and fair society, promoting its betterment through open government and constructive expression of personal beliefs and values.

Whether it is participating in political activities, lawfully advocating for Solventum's business interests, or giving to and volunteering for charitable causes, many of these activities are highly regulated and may come with registration and reporting requirements. Therefore, such activities should be done with careful consideration of company policies and legal requirements.

Product, quality, safety and stewardship

We are committed to leading patient / end-user safety and improving every life by providing reliable, quality products and solutions that meet or exceed customer, statutory, regulatory and Solventum internal requirements through-out the life cycle of each product. We practice

responsible chemical, material, and product management to minimize negative health, safety, and environmental impacts, and maximize value to our businesses. Maintaining an effective Quality Management System supports our requirements with excellence and integrity. We achieve these goals by conducting ourselves according to the following principles:

- Make Quality our top priority.
- Follow company policy, procedures, and work instructions.
- Support efforts to improve the quality, safety, and stewardship profile of our products within the scope of our roles.
- Integrate these considerations into the research, design, manufacturing, marketing, sale, monitoring, and disposal of our products.
- In the same way we hold ourselves accountable for our product quality, safety and stewardship, we also hold our suppliers and distributors accountable for these aspects of the products and services they provide.
- Complete all training in a timely manner.

We maintain our customer's trust by speaking up and asking questions related to potential quality and safety issues, even when the answer may limit options or lead to additional costs, time delays, or unanticipated work. As part of our commitment to product safety and performance, we have a responsibility to report any product quality issues so that we take appropriate corrective and preventive actions. If you learn of a complaint associated with our products, you are required to promptly report it to Complaint Handling.

Fraud, waste and abuse

Solventum recognizes that the prevention, detection, and correction of fraud, waste, and abuse in our business dealings is essential to support the overall integrity of healthcare programs.

By staying up to date on compliance training, policies and procedures required of their role, employees and contractors working on behalf of Solventum should understand and apply the rules applicable to the specific business dealings they are assigned to undertake for the company.

At Solventum, it is important that we do our part to prevent, detect and correct fraud, waste, and abuse. If suspicious activity or potential violations are suspected or observed, employees and contractors have a duty to report it immediately. Solventum does not tolerate retaliation for making a report in good faith. It is also important to bring awareness of any government authority communication relating to a non-routine audit or investigation of Solventum business practices to your supervisor and the legal department to enable cooperation and a timely response. Solventum is committed to providing complete information and full cooperation.

More specific to our U.S. business, in our activities as a first-tier or downstream entity in the United States Medicare Advantage Plan, and as a durable medical equipment (DME) provider (U.S. Medical Solutions Division business), the company is committed to compliance with all fraud, waste and abuse laws applicable to its business including but not limited to federal anti-bribery laws (Anti-Kickback Statute), federal self-referral laws (Physician Self-Referral Law), the U.S. False Claims Act, the U.S. Criminal Health Care Fraud Statute, the U.S. Exclusion Statute, the U.S. Civil Monetary Penalties Law and state versions thereof. In addition, Solventum is guided by industry and accreditation standards.

Fair competition

Antitrust and competition laws encourage competition among sellers in an open marketplace, which gives consumers – individuals, companies, and governments – the benefit of lower prices, higher quality, increased choice, and greater innovation. At Solventum we comply with all antitrust and competition laws globally.

We succeed by selling innovative, quality products and competing fairly, honestly, and ethically in an open marketplace. We follow the antitrust and competition laws that apply to us. At Solventum, we abstain from behavior that might violate, or even create the appearance of an attempt to violate the laws.

Certain types of behavior are prohibited:

- Price fixing - Making an agreement with a competitor to raise, lower, or stabilize prices or other competitive terms.
- Bid rigging – Coordinating bidding activity with competitors.
- Market division – Dividing customers, territories, or markets among competitors.
- Output restriction – Agreeing with a competitor to reduce output or restrict the cap.
- Agreeing to reduce product quality or performance.
- Group boycotts – Agreeing with a competitor to not do business with targeted individuals or businesses.
- Exchanging pricing or other competitively sensitive information with competitors (such as pricing, salary, or benefit information).

Other behavior may raise concerns, depending on the circumstances:

- Bundling or tying products
- Price discrimination
- Loyalty rebates
- Exclusive dealing terms
- Bench marking

Many different business activities have the potential to be considered anticompetitive in certain circumstances. Because antitrust and competition laws vary from country to country and are complex, always consult your assigned Solventum Legal Counsel for advice about your specific situation.

Anti-bribery

Fairness and integrity are central to the success of our business. Our customers, shareholders and third parties trust us to do business the right way. To maintain their trust, we don't engage in unethical business using bribes, kickbacks, or other corrupt payments—regardless of any local business custom. Anti-bribery laws around the world make bribery illegal. It is illegal to offer, promise, give, or accept anything of value to or from a business partner or government official that could or could appear to improperly influence them. Solventum can be held liable for the wrongdoing of not only Solventum employees, but also our business partners.

Key terms

Anti-bribery laws can be complex. It is important to understand the terminology involved.

Bribe - An offer or promise—either direct or indirect—to give or accept something of value with the intent to gain an improper advantage or improperly influence a decision. Bribes can come in many forms, including favors, gifts, charitable or political contributions, offers to hire a government official's relative, or even discounts that are not available to others.

Kickback - The return of a sum of money paid (or due to be paid) as a reward for making or influencing a business arrangement. A kickback differs from a bribe in that they are generally solicited by the buyer's employees, whereas bribes are generally offered by the seller or those seeking to gain an unfair advantage.

Facilitation payment - Generally, a small payment made to speed up a non-discretionary government action, such as obtaining a permit or starting a utility service. These are prohibited.

Government Official - This is a broad term that includes:

- Anyone acting on behalf of a government or its departments, agencies, or divisions.
- Employees or associates of institutions owned or controlled by a government, such as public universities, hospitals (including Health Care Professionals), utility companies, or transportation authorities.
- Political candidates and political party officials
- Employees of some international organizations, such as the United Nations
- Members of royal families

Anti-corruption laws - We comply with the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA) and any local anti-corruption laws that apply to us.

Due diligence of Business Partners –When selecting a Business Partner, avoid anyone who has a history of bribery or unethical conduct. Speak to your manager or supervisor, your assigned Legal Counsel, or a member of Ethics & Compliance as part of your due diligence process.

Integrity in sales and marketing

When we are honest about representing Solventum's products and services to the public, we preserve the reputation of our company and respect our customers and the patient-physician relationship.

All promotional materials, including advertising, literature, product labeling and public statements about products and services must be accurate and truthful and include a balanced picture of risks and benefits. We do not disparage competitors' products or services to succeed, and we follow regulations that are applicable to relevant products.

Trust in Solventum's relationship with its customers, business partners and end users are accomplished by communicating honestly and accurately about our products and services.

Keep in mind the following guidance:

- Always represent Solventum products and services truthfully, fairly, accurately, and in a professional manner in emails, conversations, contracts, sales materials, advertising, packaging, promotions, and all other communications.
- Substantiate claims, as appropriate, through testing based on sound statistical and scientific principles.
- Do not overstate a product's performance.
- Do not make claims that have not been approved or appropriately substantiated.
- Avoid advertising or claims not consistent with Solventum's corporate values.
- Use only advertising and promotional material that has been properly approved by Solventum.
- Do not engage in deceptive acts or practices or other unfair methods of competition.
- Do not make false or deceptive statements about Solventum's products or services.
- Do not make false or deceptive comparisons about any competitors' products or services.
- Do not unfairly criticize or discredit a competitor or its products or services.
- Do not misrepresent the quality or effectiveness of a product or service.

Business partner relationships

Our business partners' actions reflect Solventum, and we expect them to meet our high ethical standard. Solventum could be liable for illegal acts committed by a business partner.

Furthermore, Solventum's reputation could be harmed if engaging with a business partner who conducts business unethically. We are committed to doing business only with those who help us maintain the quality of our reputation, our relationships and our products. This commitment includes complying fully with all anti-money laundering and anti-terrorism laws throughout the world, as discussed in the Business and Financial Records section of this Code of Conduct.

We use only those business partners, such as suppliers, contractors, joint venture partners, agents, sales representatives, distributors and consultants, who are operating ethically and are qualified to provide quality products and services at a fair value. It is critical that all Solventum business partners share our commitment to conducting business with integrity.

This means that you should:

- Confirm business partners are reputable and qualified.
- Avoid actual or perceived conflicts of interest in selecting or dealing with business partners.
- Reject side agreements (such as an agreement to keep business away from another business partner.)
- Never accept a bribe or a kickback.
- Properly protect both Solventum and the supplier's confidential information.
- Never use business partners as intermediaries to make payments prohibited by this code or applicable laws.
- Report any issues or concerns you observe related to suppliers' facilities, treatment of workers, sub-suppliers and business practices.
- Follow Solventum procedures for establishing relationships with business partners.
- Inform Solventum business partners of our expectations.

Doing business with the government

Government contracting is a complex and highly regulated area of business. Interactions with the government are subject to strict rules to avoid improper influence being placed on the decisions of a government, its officials, or its employees. There are many laws and regulations governing the conduct of contractors and government personnel. Failure to observe these laws and regulations can result not only in the loss of business, but damage to Solventum's reputation, and civil and criminal penalties to individual employees and the company.

Solventum conducts business with government officials, government agencies and government-owned enterprises. It's our responsibility to always apply the highest ethical standards and comply with all the applicable laws and regulations, including certain specific requirements associated with governmental transactions.

- Never offer or accept anything of value that could be perceived as a bribe or kickback.
- Never seek to obtain confidential information about a government purchase or contract.
- Review and understand requirements set forth by government customers before issuing proposals, accepting contracts and/or engaging in interactions involving transfers of value.
- Be aware of some common risks: gifts & gratuities; anti-trust and collusion; post government employment restrictions; misrepresenting socio-economic business status; personal conflicts of interest; organizational conflicts of interest.

Broadly defined, government officials include a range of individuals, including:

- Government employee (municipal, state or federal) or elected or appointed official.
- Political party or Candidate for political office (even if not currently in office).
- Employees of a government or agency (police, tax and customs inspections).
- Professors who work at state-run universities.
- HCP who works in a public or government sponsored health care program (e.g., state-owned university hospital, government-funded dental program).
- Consultant, speaker or advisor retained by Solventum who is a government employee.
- Government employee who benefits from a Solventum research grant.
- Official or employee of quasi-public or non-governmental international organization (sometimes referred to as "NGOs") such as the United Nations, Red Cross/Red Crescent, International Monetary Fund and the World Bank, and
- Employee of a quasi-public agency and other companies or organizations partly or wholly owned or controlled by a government.

Business courtesies

Operating with integrity in the marketplace is important to Solventum's reputation, and we value business obtained through the proper use of business courtesies. In our interactions with customers and business partners, we do not give or receive inappropriate gifts, favors, entertainment, meals, or travel. Also, special rules apply when working with a health care professional (HCP), (whether private or government affiliated), a government official, or certain

business partners and we support compliance with specific Solventum policies, standards, and local laws.

Giving or accepting a gift can create the appearance of something improper, such as favorable or preferential treatment. Always avoid gifts, favors, entertainment or travel that could appear to be bribes or raise questions about conflicts of interest for you or Solventum or could damage our reputation.

Gifts present unique challenges. Modest gifts can be appropriate in certain circumstances, but even modest gifts can violate laws, rules, and regulations if given to improperly influence the recipient. Solventum policies and procedures address the specific rules and many circumstances, providing employees with the appropriate guidance.

When offering or accepting business courtesies, there are several factors we need to keep in mind.

Value – If appropriate, business courtesies should be of modest value, such as a reasonable meal. We should never offer or accept anything that we—or anyone else—could consider to be extravagant.

Frequency – The exchange of business courtesies should be infrequent. Offering or accepting gifts, entertainment, meals, or business travel too often could make it appear that the business relationship is not completely impartial.

Timing – We support business dealings that are honest and unbiased, and we must consider the timing of contract renewals and other significant decisions when offering or accepting business courtesies. Avoid the appearance that any business courtesy is an attempt to influence a business decision.

Cash or cash equivalents – it's against Solventum policy to offer or accept cash or cash equivalents such as gift cards, gift certificates, or vouchers.

Interactions within health care –health care professionals, institutions, and their patients

Solventum seeks to develop and maintain appropriate and transparent working relationships with health care professionals, the institutions for which they work and the patients they treat to advance patient care and make better health possible.

A Health Care Professional (HCP) is any person or entity (a) authorized or licensed to provide health care services or items to patients, or (b) who is involved in the decision to purchase, prescribe, order, or recommend medical products, technologies and related services and solutions. HCPs include individual clinicians (for example, physicians, dentists, orthodontists, nurses and pharmacists, among others), provider entities (for example, hospitals, ambulatory surgical centers, pharmacies and durable medical equipment suppliers) and administrative personnel of provider entities with purchasing, formulary, or practice policy-making responsibilities (for example, hospital administrators and purchasing agents, group purchasing organizations, and dental service organizations). Entities broadly involved in the health care services industry that are owned by HCPs should also be considered HCPs for purposes of this definition. This definition does not include health care professionals who are bona fide employees of Solventum, while acting in that capacity.

These relationships are essential to facilitate the development of care-advancing technology and to support the safe and effective use of Solventum products and services. Failure to establish and conduct these relationships in accordance with Solventum policies, which are built upon the foundation of the laws, regulations and industry codes that apply to such interactions, can have consequences for patient care, cause reputational harm, and expose parties to monetary fines and criminal penalties.

The breadth of interactions that can occur, which may involve the giving or exchanging of transfers of value, present unique and varied challenges.

Foundationally, at Solventum such interactions should:

- Be structured, conducted, and reported in compliance with the law, regulations, and industry codes that govern and guide, and be consistent with Solventum's values.
- Not be intended to induce another to use, order, refer or prescribe Solventum products, or reward for the volume or value of past, present, or future referrals.
- Recognize and respect the patient-provider relationship, the independence of a provider's clinical judgement in the provision of health care, and an institution's right to establish practice protocols with respect to the care of its patients.
- Recognize and respect patient rights, including their right to autonomy, to be treated with dignity, to make decisions, and their privacy.

To support our reputation as an organization that acts with integrity and within the boundaries of the law, Solventum has set reasonable requirements, limits, boundaries, and prohibitions for these interactions through its policies.

Life sciences and applied medical research

In the development of its product solutions, Solventum undertakes scientific and clinical research in compliance with applicable standards and the laws and regulations that relate to the ethical and safe conduct of life science research involving humans and applied medical research involving animals.

To obtain and maintain regulatory clearances and approvals for our health care products, Solventum has a responsibility to assess and document its products' design, safety, and effectiveness through the conduct of competent and compliant research practices and utilize findings that are verified and reliable.

Further, trust in the products Solventum develops and enhances throughout their life cycle relies in part on the confidence in research it undertakes or third-party research it supports to affirm product safety and efficacious performance.

This means that conducting research in compliance with the utmost ethical and scientific standards and in accordance with good clinical practice and animal research practice is essential. To support effective research in line with recognized ethical standards and legal requirements, Solventum's scientific and clinical research involving human and animal subjects should among other things: be designed and conducted or supported through the clinical affairs organization (human) or the research and development laboratory (animal), under the approval of an institutional review board (human) or institutional animal care and use committee (animal), where required; be conducted for reasons and in a manner that are above reproach, aligned to current

ethical research principles; and be reported to regulators, both the existence of the study and its findings where required, timely, truthfully, and accurately.

Those that are involved in research on behalf of Solventum should follow all applicable legal and regulatory requirements as well as Solventum policies.

Contact the clinical affairs organization (human) or the research and development laboratory (animal) for guidance on any such research activities.

Data privacy and security

As part of doing business, Solventum receives medical and other personal information about patients, customers, and employees. Solventum recognizes our employees, customers and patients trust us to use this information responsibly and to respect their privacy.

Solventum may collect, process, and use this information for legitimate business purposes and to comply with legal and regulatory requirements, in accordance with its Global Privacy Policy, HIPAA Privacy Policy and other regional regulatory policies as applicable. Employees handling privacy data are required to understand all regulatory requirements applicable to data use. They must keep Privacy data secured from cyber threats and take care to limit access, prevent unauthorized access and prevent accidental loss or destruction of such information.

We recognize data privacy laws affording individuals the right to control their personal information and protect it from use or disclosure, along with security regulations that identify how that information should be protected can be complex and varied. As such, employees must be committed to understanding and complying with the applicable privacy and data protection laws of jurisdictions from and in which personal information is collected, processed, or used in furtherance of our business endeavors.

What is Personal Information?

Personal information is any information that can directly or indirectly identify an individual. Here are a few examples:

- Name, date of birth, address, or email address
- Government issued identification numbers (driver's license, passport, social security number or national identification number)
- Log-in credentials, such as username and password
- Financial information such as credit card number, bank routing details or account number
- Health related information, such as medical records and images

Confidential information

At Solventum, we rely on confidential information to aid in the development of innovative products, advance patient care and promote our competitive advantage. Confidential information includes non-public information, trade secrets and other proprietary information, which can be found in many facets of Solventum's business, including product, financial, organizational, and third-party related information, including personal information of patients, employees, and customers. As

confidential information extends beyond Solventum's own information to include secret or restricted information that belongs to those we do business with and our competitors, we should be mindful of this and take steps to protect all confidential information from improper use or disclosure.

Adequate steps should be taken to protect, secure and limit access to confidential information to those persons, internally and externally, who have a "need to know" such information for Solventum business purposes and are bound by an obligation of confidentiality. Confidential information needs to be protected by employees, safeguarding it from unauthorized disclosure, in accordance with company policies. All information, other than public information, should be treated confidentially.

Solventum is committed to using only legal and ethical means to collect and use business and market information in order to better understand our markets, customers and competitors. Solventum will not collect or use another party's confidential information without that party's permission.

Global trade compliance

As a global company, Solventum is committed to complying with the international trade compliance laws that apply to us. We comply with laws that regulate the following:

- **Imports and customs activities** - Customs authorities and their partner government agencies require that the importer of goods states or supports accurate tariff classification, value, country of origin, product marking, preferential trade status, and other critical data elements.
- **Exports and export controls** - Exports of certain products, technologies, software, and technical information may be subject to licensing requirements.
- **Trade embargoes and economic sanctions** - Trade embargoes and economic sanctions prohibit some or all business activities with certain countries and their nationals, or with specific entities or individuals.
- **Anti-boycott** - Under the trade laws of the US and other countries where Solventum does business, we must not participate in unsanctioned boycotts, or refusals to trade with a specific country.

It is up to all Solventum employees to understand and follow the trade compliance laws that apply to our work—and to ask questions when we are unsure. Just as we must never participate in any trade activity that violates these laws, we may not ask a third party to do so on our behalf. If there is a conflict between Solventum's policies and local trade laws, always follow the law. For additional guidance, please contact Solventum's Global Trade Compliance Department.

Conflicts of interest

Conflicts of interest which include situations where personal interests, loyalties or relationships could inappropriately influence, or appear to influence business judgment should be avoided by Solventum employees. Decisions should be made, and employees should act in the best interest of Solventum rather than for personal gain.

If not managed appropriately conflicts of interest can result in business and reputational damage, to both the individuals involved and the organization.

Steps should be taken to avoid, identify, disclose, and update management on a periodic basis of any real, potential, or perceived conflicts of interest. Disclosing conflicts of interest as soon as possible in accordance with company policy helps us maintain our culture of integrity.

Insider trading

Material non-public information or “inside information” that could influence someone’s decision to buy, sell, or hold stock or other securities, learned in the course of your duties with Solventum about Solventum or its business partners, should never be used to trade in that company’s stock or other securities or to manipulate the price of publicly traded stock or other securities.

Use or disclosure of inside information to facilitate insider trading, for yourself or others, is illegal and unethical and could result in civil and criminal penalties, including jail time for those involved.

Solventum policies prohibit members of the Board of Directors, employees, and contractors from trading on any inside information or enabling others to do so. This includes never providing others with inside information—a practice called tipping, even if it does not directly benefit you, as it could still be in violation of insider trading laws. Actions by your family members that share your household will be attributed to you for insider trading purposes.

You should be aware of and comply with the rules and take precautions to avoid the risk of insider trading.

Business and financial records

Solventum’s business and financial records are the information by which we are measured. We rely on the accuracy and integrity of these records to inform internal decisions and external disclosures we make to regulators, business partners, investors, and others. Therefore, creating and maintaining truthful, accurate, complete, and up-to-date business and financial records of all business transactions is essential to our operations and compliance with laws.

Nearly every business activity an employee undertakes or engages in can impact business and financial records. This makes it essential that each employee does their part to help our organization meet its business, legal and regulatory obligations and seek guidance when needed. This includes:

- Being alert to possible red flags that may appear during business.
- Following established internal controls and record management policies on proper maintenance, retention, and disposition of records.
- Maintaining one set of business and financial records that records all transactions truthfully and accurately.
- Only conducting business with reputable business partners whose business activities are legal and funding is derived from legitimate sources; and
- Being transparent, providing complete information and fully cooperating in any Solventum or external authority’s audit or investigation.

In support of our company's commitment to compliance, we all have a responsibility to make sure our records meet these requirements. If suspicious activity is detected, promptly inform your assigned legal or ethics and compliance representative.

Company resources

Solventum's assets are essential to our Company's success. Solventum's property, money, and other resources should only be used for the advancement of business and not for personal gain or fraudulent purposes. No matter which assets we use or have access to as part of our work, our responsibilities are the same:

- Safeguard Solventum's assets.
- Limit personal use of Solventum's assets.

We are good stewards of Solventum's assets by:

- Taking reasonable care to prevent loss, damage, destruction, theft, unauthorized, or improper use or waste of Solventum's assets.
- Using or authorizing the use of Solventum's assets only for business purposes, regardless of condition or value. Incidental and occasional personal use of physical assets such as telephones, computers, internet access and email are permitted so long as such use is reasonable, does not interfere with your job responsibilities and responsiveness and is in accordance with Solventum's policies and procedures.
- Never taking, selling, lending, borrowing, giving away, or disposing of Solventum's assets without proper authorization; and
- Reporting any concerns about the use, abuse, or endangerment of Solventum's assets in accordance with the "Speak Up" section of this code.

External communications

External communications relating to Solventum on social media, to investors, to media, and to/through other outlets are a reflection on the company, its reputation, identity, and integrity. Those communications can impact not only the organization but its investors, business partners and the customers that we serve. Therefore, it is important that such communications be done with careful consideration of company policies.

The company has spokespersons authorized to provide Solventum's official position on specific issues. Those authorized to communicate on behalf of Solventum are limited and employees should take care not to overstate their authority.

- Media requests, including social media requests for comment, should be routed to the corporate communications team.
- Inquiries from financial outlets should be forwarded to Solventum investor relations.
- Non-routine requests for information from a government authority should be directed to your Solventum legal representative to allow for compliance with any legal obligations and to your Solventum government affairs representative to understand if any related activities currently exist.

Where employees are not communicating on behalf of Solventum but may have reason to comment about the organization, its products and services, such as when connecting through social media in a personal capacity, employees should exercise caution, disclose they are a Solventum employee, and communicate factually and respectfully.

Our commitment

At Solventum, we embrace the value of solving what matters in our effort to provide quality products and solutions to improve lives. We cultivate a culture that supports doing the right thing, which is at the core of our commitment to winning with excellence, through conducting business with fairness and integrity, helping us establish trust and advancing healthcare.