

Standards of Business Conduct

The **Spark** starts with **you**

A Message from Padraig

At Agilent, we consider it an honor to help our customers and partners bring great science to life and achieve world-changing pursuits.

That is enabled by empowering our employees to make the right choices for Agilent.

One way we do that is by living our values every day as we interact with each other and our customers. Among those values is **uncompromising integrity** — what we define at Agilent as “we adhere to the highest standards.” We want employees to be able to make good decisions every day — decisions that impact our colleagues, our customers and partners, and our shareholders.

Guiding us in that process is Agilent’s Standards of Business Conduct.

This document details our expectations as an employer, partner, customer, and supplier in the life-sciences industry and provides practical guidance for your day-to-day activities. Activities that are foundational to Agilent being an outstanding company, one where our team members are empowered, accountable, and feel a sense of belonging.

When you choose to work with Agilent, you choose to abide by our Standards of Business Conduct.

Thank you for your commitment to adhering to the highest standards — not only for Agilent but for the great science we help bring to life in fulfilling our mission of advancing the quality of life. Always remember: **The Spark Starts with You.**

Padraig McDonnell

Padraig McDonnell
President and CEO, Agilent Technologies



Meet Dr. A: Your Guide to Agilent’s Standards of Business Conduct

With approximately 17,000 employees across 110 countries, Agilent is a global company making a big impact. Our products and services are used throughout the life sciences, diagnostics, and chemical markets. And our innovations are used to improve quality of life for everyone. In our business, reputation matters as it impacts our interactions with customers, regulators, and stockholders.

To help you get the most out of the Standards of Business Conduct, we’re partnering you with an expert. Dr. A has a degree in Compliance Science and will serve as your official guide to Agilent’s Standards of Business Conduct.

Agilent team, meet Dr. A.

Greetings!

I’m Dr. A — a Compliance Scientist and your official guide to Agilent’s Standards of Business Conduct, or SBC for short.

In this document, you’ll find clear, easy, actionable guidance that will help you make good decisions at work. Before we dive in, I want to point out a few key features you’ll come across as you explore this code.



Agilent Core Values

We talk a lot about our values in the SBC. Each time we do, we **bold** the value we’re speaking about.

Links to Internal Resources

At the end of each topic you’ll find Key Links to resources, policies, and additional guidance you can use to make ethical decisions at work. You can also visit the SBC Hub, which is a central site to help you navigate the topics.

The Spark Starts with You

We close each topic in our SBC with a reminder to you, our amazing team members: The Spark Starts with You.

Let’s get started!

KEY
LINKS

Standards of Business Conduct Hub

This note will always include a helpful tip (or friendly reminder) you can use to demonstrate our values and practice good business.

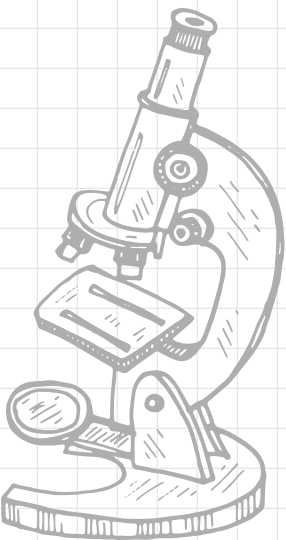
The Spark
starts with
YOU



Manesar, India

A Look at What's Inside

Guiding Principles and Practices	5
<ul style="list-style-type: none">• Agilent's Core Values• The Science of Great Leadership• Mitigating Risks Across Our Business• Asking Questions and Reporting Concerns• An Introduction to Conflicts of Interest	
Innovating with Integrity	17
<ul style="list-style-type: none">• Our Expectations for Research, Development, and Manufacturing• Innovating and Collaborating Safely• Safeguarding Agilent Information• Cybersecurity• Supplier Relationships• Our Commitment to the Environment	
Good, Clean Business Practices	29
<ul style="list-style-type: none">• Marketing and Selling Agilent Products• Theft in the Workplace• Building Ethical Business Relationships• Corruption, Money Laundering, and Trade Compliance• Business Gifts and Entertainment	
Acting as an Agilent Team	41
<ul style="list-style-type: none">• Diversity and Inclusion• A Safe Workplace	



The Agilent Standards of Business Conduct applies to all Agilent employees, board members, suppliers, partners, and contractors working for or with Agilent Technologies (and its affiliated entities). In addition to adhering to this code, Agilent also requires all parties to comply with applicable laws and regulations, policies, and procedures, of the organization which apply to them. In some instances, our policies are more protective than what is required by law. In those instances, the Agilent standards apply.



Manesar, India

Guiding Principles and Practices



We cover a wide range of topics in our SBC — from conflicts of interest to cybersecurity, supplier relationships, and so much more. I know you're eager to learn, but before you go any further, it will be helpful to familiarize yourself with our guiding principles and practices. These will set you up for success as you explore the rest of the SBC.

important. But when combined, they create and **innovation** thrive. That's why we make and every action we take.



TRUST
We invest in authentic relationships



RESPECT
We treat others as they want to be treated



TEAMWORK
We act as one team

Agilent

You let our values guide you, make choices that strengthen our team. If you're ever unsure about what to do, look to our values first and ask for help.

The **Spark** starts with **YOU**

TABLE OF CONTENTS
INTRODUCTION
GUIDING PRINCIPLES AND PRACTICES
INNOVATING WITH INTEGRITY
GOOD, CLEAN BUSINESS PRACTICES
ACTING AS AN AGILENT TEAM



Manesar, India

Guiding Principles and Practices

- Here are the topics we'll cover in this section:
- ✓ Agilent's Core Values
 - ✓ The Science of Great Leadership
 - ✓ Mitigating Risks Across Our Business
 - ✓ Asking Questions and Reporting Concerns
 - ✓ An Introduction to Conflicts of Interest

Agilent's Core Values



On their own, each of our values is important. But when combined, they create a culture where safety, ethical behavior, and **innovation** thrive. That's why they're the basis for every decision we make and every action we take.



KEY LINKS

Culture Hub

When you let our values guide you, you spark choices that strengthen our culture. If you're ever unsure about what to do, look to our values first and ask for help.

The **Spark** starts with **YOU**

The Science of Great Leadership

No matter your position, everyone at Agilent can demonstrate leadership — especially when it comes to our SBC. The three tips below apply to every topic and every aspect of our business.



Three Tips For a Thriving Culture



Let our values guide you

Use our values to inform your decisions and actions at Agilent.



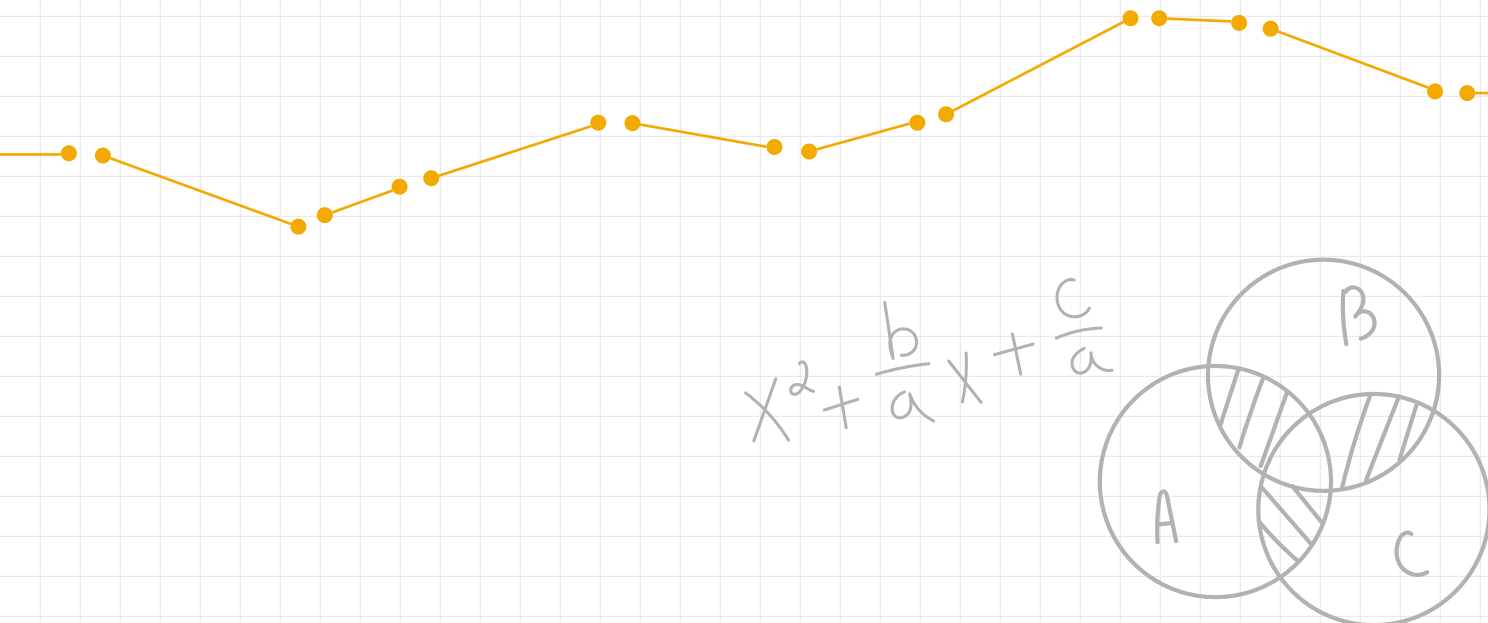
Lead by example

Lead with your actions and support with your words. When you do what you say and exemplify our values, people will follow your example.



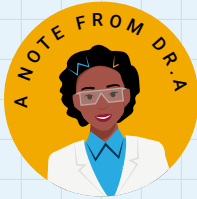
Listen to others

Create an environment where people are comfortable asking questions and **speaking up**.



Carpinteria, CA, USA

Mitigating Risks Across Our Business



Risk is the potential for your decisions to lead to consequences for you and Agilent. Taking on some reasonable risk in our daily operations may be necessary to do good business, but we try to minimize unnecessary risk by implementing controls and using our three lines of defense to help us identify and mitigate potential issues.

Agilent's Controls

Our controls are built into our procedures, policies, and processes — forming the core of how we operate. You'll find them in nearly every area of our business.

Agilent's Three Lines of Defense

Each line of defense is comprised of people who share common risk-management responsibilities — starting with you. You're our first line of defense. When all three lines of defense work together, along with oversight from the Board of Directors and Senior Management, we mitigate risks that could affect Agilent's performance and reputation.

Line of Defense	1	2	3
	All Employees	Functions: Environmental Health and Safety, Finance, Treasury, Global Quality and Regulatory Affairs, IT, Legal, Legal Compliance, Human Resources	Internal Audit, External Auditor
Controls	<ul style="list-style-type: none">• Agilent values• Training and education• Agilent policies and procedures• Process for seeking guidance and concerns	<ul style="list-style-type: none">• Program design requirements, including adherence to Agilent policies, procedures, risk assessments, and monitoring	<ul style="list-style-type: none">• Regular audits of businesses, functions, and controls

Handling Risk with Care

Combined, our controls and three lines of defense form our Risk Management Process. This process ensures that we're continuously monitoring for and responding to risks. By taking a proactive approach, we can manage risks before they turn into crises.

Risk Management Process



Following our procedures, policies, and processes helps ensure you're doing what's needed to protect Agilent (and yourself) from unnecessary risks.

The Spark starts with YOU

Asking Questions and Reporting Concerns



We understand that doing the right thing isn't always easy. At Agilent, we have tools you can use to report any policy or legal concerns you may have — quickly and confidentially.

When you're deciding whether to report a concern, you might be afraid that it could lead to retaliation against you. *Agilent prohibits retaliation against anyone who makes a good-faith report or anyone who assists as a witness in any investigation.*

If you think someone is acting in a manner that's inconsistent with the principles and guidance outlined in this document, or in other Agilent policies or procedures, it's important to say something so the appropriate actions can be taken.

Policy or legal violations can result in disciplinary action — including the termination of your employment / contract.

Your Leaders are Here to Help

Employees may make a good faith policy or legal concern to any manager, a member of Human Resources or Legal, or via the Agilent Compliance Helpline.



Your Leader



Human Resources



Legal



Compliance Helpline

The Agilent Compliance Helpline

The Agilent Compliance Helpline gives you a safe space to report your concerns anonymously, confidentially, and in your own language online or by phone 24/7.

We take every report made in good faith seriously and treat every person who comes forward with compassion and **respect**. We know making a report can be a big decision and that you're trying your best to do what's right.



What Happens When You Contact the Helpline?

1

YOU SUBMIT A REPORT

You help us understand the issue by providing details, including what happened, who was involved, and when the issue occurred.

2

THE COMPLIANCE TEAM RECEIVES IT

You will receive a confirmation your concern has been received. Agilent takes all reports submitted seriously and handles them with confidentiality.

3

AN INVESTIGATOR REVIEWS IT

An investigator will review your concern and may reach out to you with questions. Your contribution to the investigation is kept confidential.

4

ACTION TAKEN

Based on the outcome of the investigation, action will be taken on your concern. Some details may be kept private.

If you have other questions or concerns, we can help!

✉

Helpline.legal-compliance@agilent.com

🖱

Agilent.com/about/compliance-helpline

KEY LINKS

[Compliance Helpline Homepage](#)
[Culture Hub: Speaking Up](#)

When you come forward with your concerns, you spark a process that will help us learn, improve, and uphold our reputation for providing "Trusted Answers."

The Spark starts with YOU

TABLE OF CONTENTS
INTRODUCTION
GUIDING PRINCIPLES AND PRACTICES
INNOVATING WITH INTEGRITY
GOOD, CLEAN BUSINESS PRACTICES
ACTING AS AN AGILENT TEAM

An Introduction to Conflicts of Interest

Just like spectroscopy shines a light on the properties of different materials, we shine a light on potential conflicts of interest by carefully reviewing our personal, business, and financial relationships. Our goal is to uncover any hidden biases or potential influences that could compromise our **integrity** or lead to poor and sometimes illegal business decisions for Agilent.

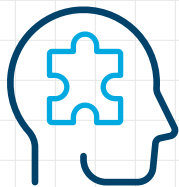


Types of Conflicts of Interest

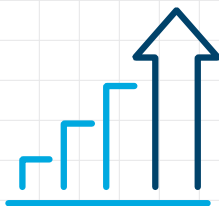
When you place your personal interests over what's best for Agilent, you compromise your ability to make sound business decisions. Plus, you expose Agilent to unnecessary risks. These situations are known as conflicts of interest.

Conflicts of interest come in three different forms: personal, business, and financial. While each conflict is slightly different, they all make it more difficult for you to demonstrate Agilent values.

Conflicts of interest can't always be avoided, and we must mitigate their risks where possible to avoid damaging Agilent's reputation (or your own).



Personal



Business



Financial

Avoiding Conflicts of Interest in Our Relationships

Teamwork plays a vital role in helping us bring great science to life. Our success as a company relies on healthy, ethical business relationships with our coworkers, business partners, shareholders, and customers.

One of the best ways to avoid conflicts of interest is to understand what might cause them in our relationships.

Type of Relationship	Conflict of Interest
Romantic/Sexual	A romantic / sexual relationship with a co-worker can prevent you from making objective business decisions. The risk for a conflict of interest increases when the romantic / sexual relationship is between a superior and a direct report.
Family	Working for or with family members can affect your perspective and objectivity – causing you to place your personal interests above Agilent's. If your family member also works for Agilent, it may lead to bias in your performance reviews or work. If your family member works for a vendor, channel partner, or supplier, it could influence decisions in their favor and create a conflict of interest.
Channel Partners, Intermediaries, and Suppliers	Financial investments or business interests in Agilent partners or suppliers can cause you to place your personal financial interests above Agilent's. This can lead to a conflict of interest.
Shareholders	Buying or selling Agilent stock based on material non-public information, or recommending that others do so, conflicts with Agilent's financial and fiduciary obligations to our shareholders. This conflict of interest is known as insider trading – and it's against the law.
Customers and Business Partners	When financial transactions with customers or business partners (including giving or receiving gifts) cloud your judgment or lead to unequal business opportunities, they qualify as conflicts of interest. Transactions like these can also be perceived as corruption and have legal implications.

An Introduction to Conflicts of Interest *(continued)*

Secondary Employment and Conflicts of Interest

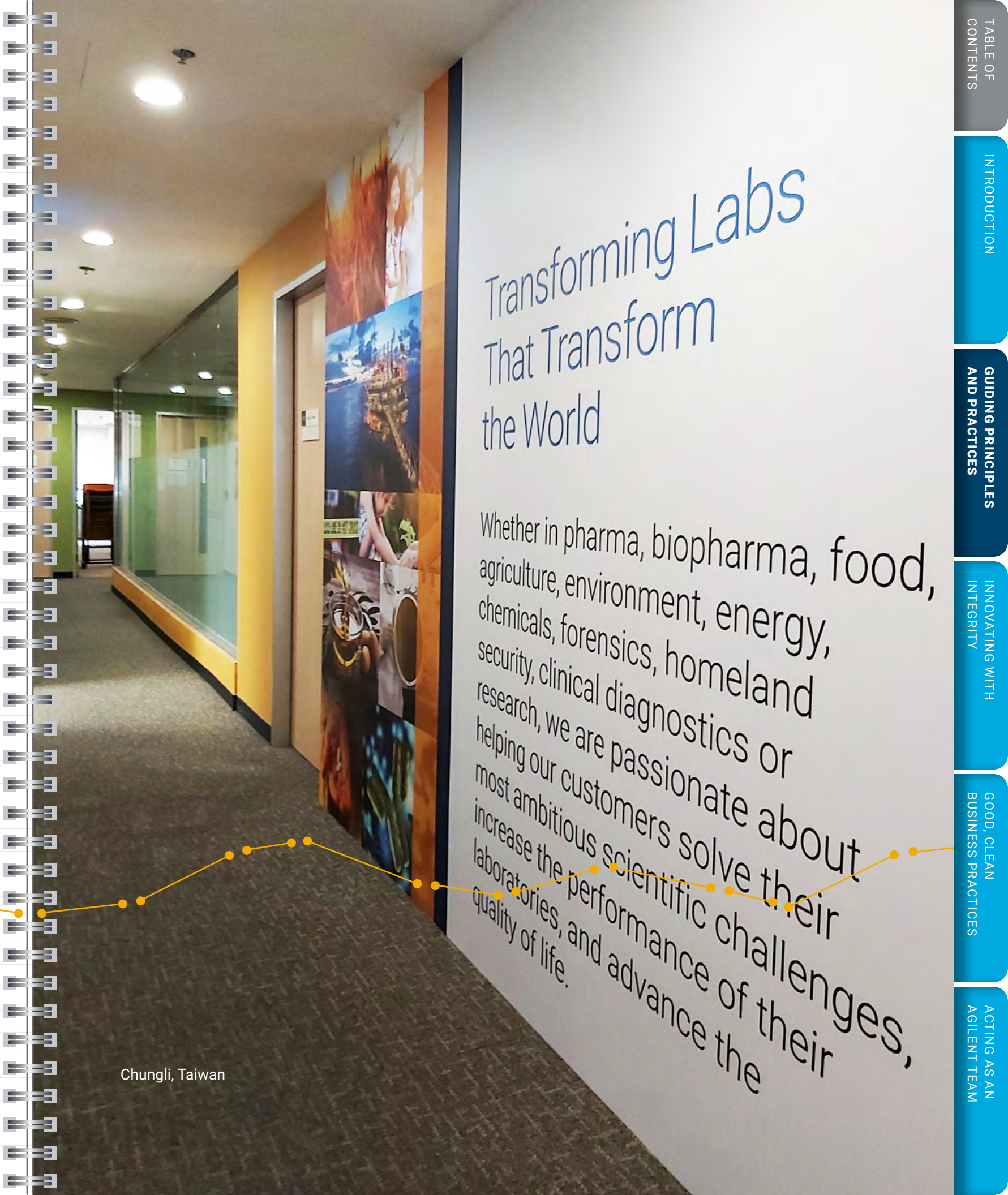
Conflicts of interest aren't just contained within the Agilent universe. If you work at Agilent and a company in the same market as Agilent, or one that is a customer, supplier, or partner of Agilent's, you risk a conflict of interest. Agilent also has express rules regarding accepting another employment relationship outside of Agilent.

Agilent's Conflicts of Interest Policy

Our Conflicts of Interest policy includes guidance on how to navigate personal and business relationships, avoid conflicts of interest, and address and mitigate risks appropriately. Be sure to read our policy before you act. If you're ever in doubt, reach out to our Legal Compliance team. They're here to help!

KEY
LINKS

Conflicts of Interest Policy
Insider Trading Hub and Policy



Chungli, Taiwan

TABLE OF CONTENTS
INTRODUCTION
GUIDING PRINCIPLES AND PRACTICES
INNOVATING WITH INTEGRITY
GOOD, CLEAN BUSINESS PRACTICES
ACTING AS AN AGILENT TEAM



Patent Wall
Little Falls, Wilmington, DE, USA

Innovating with Integrity



Innovation is in our DNA. You can find it everywhere – from the way our sample preparation products speed up lab workflows to the automation capabilities of our diagnostic instruments.

Each Agilent innovation is backed by meticulous research and development (R&D) and driven by the commitment and teamwork of our Agilent team. Throughout the R&D cycle of discovery, testing, and quality assurance, you'll encounter business scenarios where you'll have to navigate not only processes, but relationships.

Research,
Innovation

Research and development (R&D) and quality control guidelines and standards, like those from the International Organization for Standardization (ISO) and the U.S. Food and Drug Administration, help ensure our commitment to these expectations helps us deliver the best answers to our customers.

Standardized procedures in place to ensure that our products meet the highest quality. The Agilent Quality team manages all quality and manufacturing activities align with

Practices

Standard design control requirements ensure that our products are accurate, and completely meet the needs of our customers. Methods, or results of our research, publications and presentations are used to apply our knowledge to frequency safety and other areas, such as, for example,



1290 Method Development LC System



Patent Wall
Little Falls, Wilmington, DE, USA

Innovating with Integrity

Here are the topics we'll cover
in this section:

- ✓ Our Expectations for Research, Development, and Manufacturing
- ✓ Innovating and Collaborating Safely
- ✓ Safeguarding Agilent Information
- ✓ Cybersecurity
- ✓ Supplier Relationships
- ✓ Our Commitment to the Environment

Our Expectations for Research, Development, and Manufacturing



Agilent is committed to ensuring all research and development (R&D) and manufacturing activities meet international guidelines and standards, like those set by the International Organization for Standardization (ISO) and the U.S. Food and Drug Administration (FDA). Your commitment to these expectations helps us minimize risks and deliver trusted answers to our customers.

Our Commitment to Quality

As part of our controls, Agilent has Quality policies and procedures in place to ensure that our products are designed and manufactured appropriately. The Agilent Quality team manages our Quality Management System, ensuring that R&D and manufacturing activities align with regulations, standards, and Agilent values.

Research, Development, and Manufacturing Expectations

- Comply with Quality system policies, procedures, and design control requirements.
- Keep good records, and document results truthfully, accurately, and completely.
- Get permission before sharing unpublished data, methods, or results.
- Give proper credit to all authors and contributors in publications and presentations.
- Before sharing data or information broadly, consider and consult on whether intellectual property protections apply.
- Adhere to applicable regulations, such as those for ionizing radiation, x-ray and electromagnetic emissions, radio frequency compatibility, motors, chemicals, noise, and product safety.
- Follow secure product design, manufacturing, testing, and supplier management guidelines.
- Strive for "right first time" manufacturing.



1290 Method Development LC System

Our Expectations for Research, Development, and Manufacturing *(continued)*

Report Any Product Complaints Immediately

Customer product complaints are serious business. If you hear about a quality, safety, or reliability issue with an Agilent product, whether through a customer, social media post, or otherwise, report it immediately.

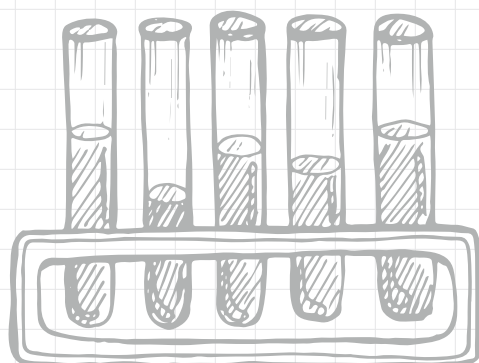
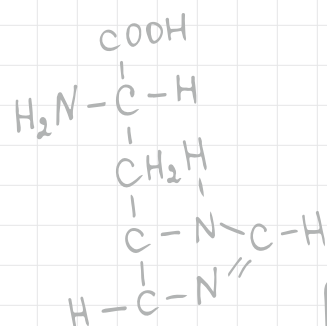
Refer to our Quality Management System Portal for more information.

KEY LINKS

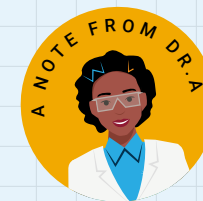
Global Quality and Regulatory Affairs
Quality Policy and Resources
Quality Management System Portal
Brand Portal

When you follow our expectations for quality, you ignite results that are reliable, replicable, and valuable for our consumers.

The Spark starts with YOU



Innovating and Collaborating Safely



Sometimes, it's okay to break things — like smashing molecules during the mass spectrometry process. The key is to do it safely and with **respect** for others. Our safety protocols are designed to prevent accidents and injuries and foster a safe workplace.

Agilent's Safety Protocols



Be alert and aware of your surroundings.



Report any safety hazards, property damage, or personal injuries.



Follow all safety and security processes.



Use equipment properly and apply personal protective equipment when required in labs or other locations (e.g., lab coats, goggles, gloves, proper footwear, etc.).

KEY LINKS

Environmental, Health, and Safety

By familiarizing yourself with our safety protocols, you're preparing for the unexpected. If the worst happens, you'll know exactly what to do.

The Spark starts with YOU



Shanghai, China

Safeguarding Agilent Information

Just as some small molecules protect cells, Agilent is accountable for protecting our information and the information of others. Below, we've outlined what types of information need to be protected. We know we can trust you to keep our most sensitive assets safe.



Types of Agilent Confidential Information

Confidential information can be any written, verbal, or electronic information that you see, hear, or create as part of your work at Agilent. Like a new product innovation, we keep our confidential information closely guarded – and we rely on you to help protect it.

Label confidential information appropriately, be careful who you share it with (and when), and securely dispose of it in accordance with Agilent's record retention policy and program. Refer to our examples below and our Confidential Information policy for more details.

Confidential Information

- Documents containing personal data
- Personnel records
- Invention disclosures and related information
- Records related to customer purchases
- Information received from customers while providing products or services
- Internal training and guidance documents for employees
- Price lists
- Customer lists
- Product drawings and specifications
- Lab notebooks
- Agilent business templates

Highly Confidential Information

- Unpublished financial results
- Information related to unreleased new products
- Information related to potential or ongoing mergers, acquisitions, and divestitures
- Documents containing sensitive personal data including social security numbers, health information, and genetic information
- Strategic business plans

Safeguarding Agilent Information *(continued)*

Protecting Agilent’s Intellectual Property

Other information, like our innovations and inventions, has enormous value for our shareholders and customers. We protect that value through intellectual property (IP) rights like patents, trademarks, copyrights, and trade secrets — or by just keeping the information confidential. Our IP reflects our collective hard work — and we need you to help us protect it. This obligation lasts even if you’re no longer employed at Agilent.



6475 LC/TQ coupled with the 1290 Infinity II LC

The Intellectual Property Rights of Others

Agilent also respects the intellectual property rights of others — including copyrights, patents, trademarks, and confidential information. We don’t accept confidential information about competitors (or anyone else) without explicit consent from the owners.

How We Treat Data

The personal data of our employees, customers, and business partners is like their DNA — precious and unique. We protect this data by following three key principles:



1. We are transparent with how we use data.



2. We do what we say with the data we collect and manage.



3. We design our products for privacy and security.

Confidential Information Hub

Have more questions about confidential information? Visit our Confidential Information Hub.

KEY
LINKS

Confidential Information Hub
Confidential Information Labeling Policy
Brand Portal

CONFIDENTIAL INFORMATION AT AGILENT

5 THINGS EVERY EMPLOYEE SHOULD KNOW

1

WHAT IS AGILENT CONFIDENTIAL INFORMATION?

- Any sensitive information you create or receive while working for Agilent.
- Use your business judgment – if it was created for Agilent, and should not be shared or posted publicly, it’s Agilent Confidential.
- Just because you created the document doesn’t mean it is yours – it belongs to Agilent.

2

CAN I USE DOCUMENTS I CREATE, OUTSIDE OF AGILENT?

- No. If you created a document while working for Agilent, this cannot be used outside of Agilent unless it is with a third party that has signed a Confidential Disclosure Agreement (CDA).

3

DON’T DOWNLOAD AGILENT CONFIDENTIAL INFORMATION TO PERSONAL ACCOUNTS OR DEVICES.

- You are not allowed to download or upload Agilent Confidential information to personal devices or messaging accounts. This includes not using external (personal) hard drives to transfer your files to a new PC.
- Doing so violates the confidentiality agreement you have signed with Agilent and can jeopardize severance benefits you may be eligible to receive.

4

OK, SO I HAVE DOCUMENTS THAT ARE AGILENT CONFIDENTIAL, SO WHAT?

- Label the document Agilent Confidential or Agilent Highly Confidential (guidance [here](#)).
- Only share Agilent information with those that need access and only with third parties that have a CDA in place.

5

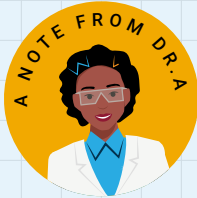
SPECIAL DUTIES FOR MANAGERS.

- If you’re a manager, you have a special duty to ensure that your employee does not take Agilent Confidential information when they leave the company.
- Before an employee leaves Agilent, ensure you have reminded them of their duty to not take any confidential information with them, and to return all documents, copies, and devices intact.

As our first line of defense, you’re often the first point of contact for those who want to access Agilent confidential information. We never share information with someone who shouldn’t have access.

The Spark starts with YOU

Cybersecurity



Cybersecurity incidents are like contaminants in a culture — they infiltrate and disrupt sensitive systems. At Agilent, everyone plays a role in protecting the information we use to bring great science to life.

Cybersecurity Precautions

At Agilent, we design our products with privacy and security in mind. You can help us strengthen our defenses against potential leaks or attacks by following these best practices.

- Submit direct and indirect suppliers for review and assessment under the cybersecurity procedures.
- Limit system and data access to necessary information.
- Protect the data of our suppliers, partners, and research participants.
- Understand cybersecurity threats and prevention methods through proper training (e.g., How to spot a phishing attack).

Using New Technologies (Including AI)

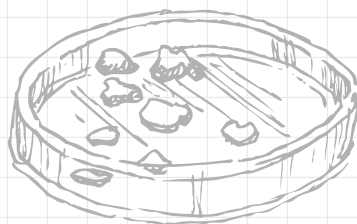
From generative artificial intelligence (AI) to machine learning, there seems to be a new piece of information technology every day. As innovators, we know you’re looking for ways to incorporate new technology into our products and processes. That’s great — as long as you focus on what matters most to Agilent.

Before you begin using any new technology for work, ask yourself these questions:

- Are there concerns about data protection and privacy that Agilent has reviewed?
- Are we transparent about how we use AI?
- Does our AI have sufficient human oversight?

KEY LINKS

Security Risk Assessment and Risk Acceptance
AI Responsibility Hub
Information Security Hub



Your vigilance and understanding of your role can help keep our systems safe from hackers.

The Spark starts with YOU

Supplier Relationships



Our suppliers are some of our most valued partners. They provide the high-quality materials and innovative solutions on which we rely. Our close relationship means that our reputations are bonded — like two elements in a compound.

If our suppliers ever make poor decisions, or worse, break the law, we may be held responsible for their actions and potentially damage our reputation. This is why we carefully and fairly select suppliers. When our suppliers act with **uncompromising integrity**, it reflects well on both of us.

Objectivity Helps Prevent Conflicts of Interest

By objectively selecting suppliers, you help avoid conflicts of interest. If you have a romantic, sexual, family, business, or financial relationship with a supplier, you must disclose that information per the policy, and remove yourself from the supplier selection process.

Expectations for Our Suppliers

We have expectations for our suppliers, just like we have expectations for our employees. All Agilent suppliers must agree to and comply with the Agilent Supplier Code of Conduct. They must also adopt sound safety, health, environmental, and human rights practices under the International Labour Organization (ILO) convention and comply with applicable laws and regulations, including those related to anti-bribery and corruption, conflict minerals, human rights, and sustainability.

KEY LINKS

Supplier Code of Conduct
Conflicts of Interest Policy

By carefully reviewing and selecting suppliers and holding them to high standards, you spark relationships that help Agilent — and our customers — succeed.

The Spark starts with YOU

TABLE OF CONTENTS
INTRODUCTION
GUIDING PRINCIPLES AND PRACTICES
INNOVATING WITH INTEGRITY
GOOD, CLEAN BUSINESS PRACTICES
ACTING AS AN AGILENT TEAM

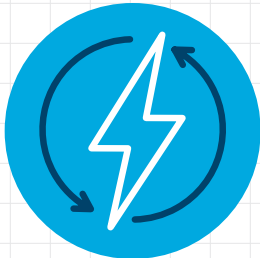
Our Commitment to the Environment



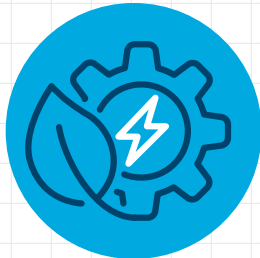
Agilent products help make the world a cleaner, healthier place — so it makes sense for us to embrace sustainable initiatives in our operations. Just like you, we take our commitment to caring for the planet seriously. We comply with all laws, policies, permits, and regulations for our business that relate to protecting the environment, conserving energy and natural resources, and reducing our environmental impact.

A Catalyst for Positive Change

Here are some ways we’re innovating with sustainability in mind:



Reducing the amount of energy needed to develop and run our equipment



Extending the life of our instruments through refurbishment programs



Decreasing the amount of material in landfills by recycling



Labeling our instruments so our customers know the contents and their impact

KEY LINKS

Environmental, Social, and Governance at Agilent

Did you know that our work touches more than 250,000 labs around the world? By taking sustainable actions here at Agilent, you help ignite positive change on a massive scale.

The Spark starts with YOU

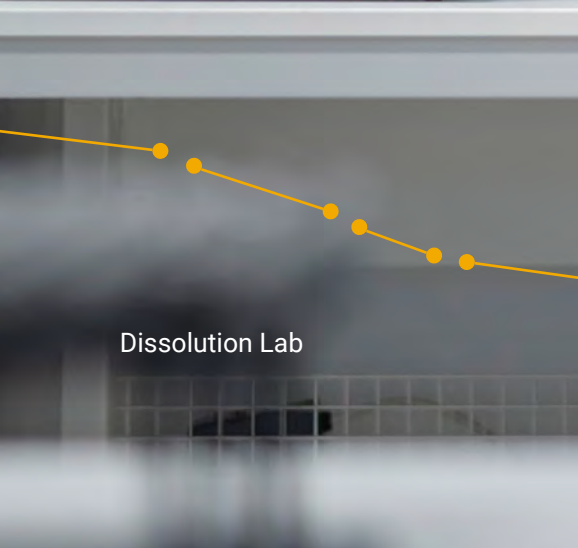
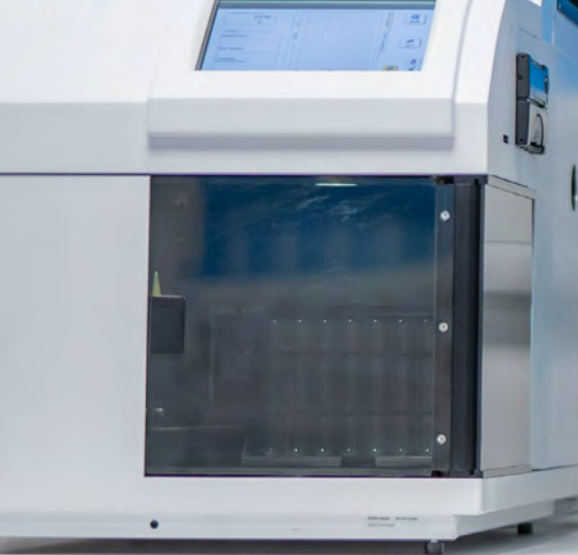


Shanghai, China

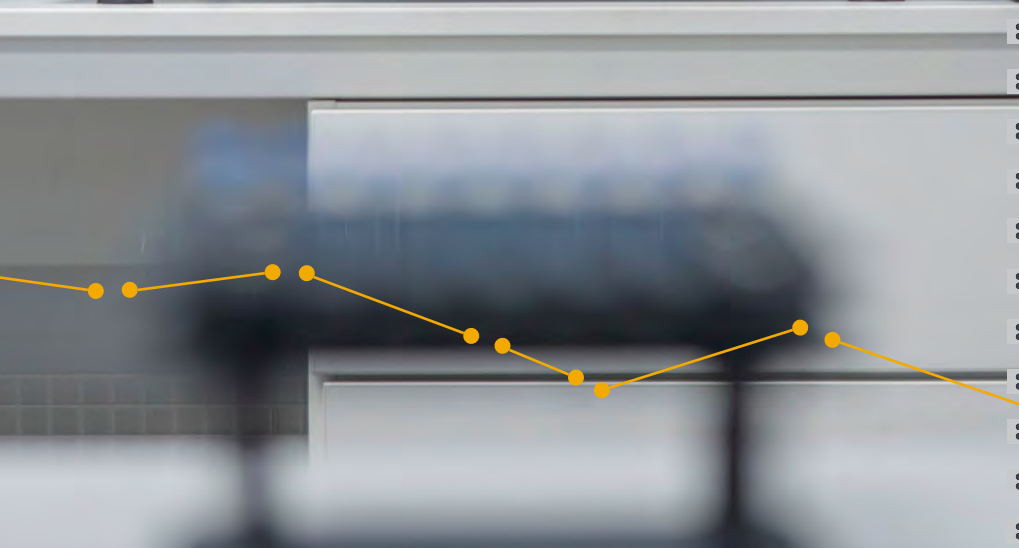
TABLE OF CONTENTS
INTRODUCTION
GUIDING PRINCIPLES AND PRACTICES
INNOVATING WITH INTEGRITY
GOOD, CLEAN BUSINESS PRACTICES
ACTING AS AN AGILENT TEAM



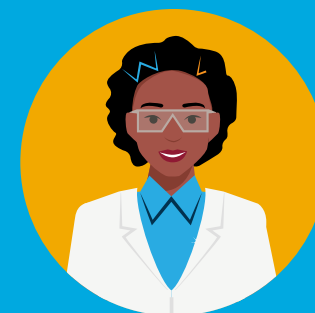
solution testing is a critical tool for development, product quality, and patient safety. Agilent's dissolution testing equipment is designed to ensure consistent results and compliance with regulatory requirements.



Dissolution Lab



Good, Clean Business Practices



Good, clean business practices are like healthy cells that grow and multiply. With every good decision you make, our business and reputation grow stronger. On the flip side, poor practices lead to decay. Our business struggles to survive, and even people outside of Agilent are affected.

the same properties, ethical sales and characteristics — honesty, transparency, and integrity — ensure we follow the strict regulations that govern medical devices — which is a top priority.

Our policies are designed to keep our marketplace fair and transparent — and hold everyone accountable. On their part, they can reflect poorly on Agilent.

Our analysis and market conditions, competitors, and our policies are designed to keep our marketplace fair and transparent — and hold everyone accountable. On their part, they can reflect poorly on Agilent.

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Dissolution Lab

Good, Clean Business Practices

Here are the topics we'll cover in this section:

- ✓ Marketing and Selling Agilent Products
- ✓ Theft in the Workplace
- ✓ Building Ethical Business Relationships
- ✓ Corruption, Money Laundering, and Trade Compliance
- ✓ Business Gifts and Entertainment

Marketing and Selling Agilent Products



Just as two molecules of H₂O share the same properties, ethical sales and marketing practices share the same characteristics — honesty, transparency, and fairness. This consistency helps us ensure we follow the strict regulations that govern our marketing efforts — particularly for medical devices — which require clear regulatory status information.

Fair Competition Laws

Fair competition laws (sometimes called antitrust laws) are designed to keep our marketplace open and honest. It's up to every Agilent employee to follow these laws — and hold our partners accountable, too. Any improper actions on their part can reflect poorly on Agilent.

Here's how you can support fair competition.

Independently determine pricing

- Make pricing decisions based on independent analysis and market conditions, rather than agreements with any competitor.
- Avoid exchanging price information with competitors.
- Ensure discounts are offered and applied fairly and openly, and in line with policy.

Foster open communication

- Treat territories and markets as opportunities for fair competition.
- While Agilent may assign territories and product lines to channel partners, avoid agreements with competitors or between channel partners to divide territories or markets (known as market allocation).

Participate in fair and competitive bidding

- Bids should be conducted independently, based on your own analysis and strategy, and not as part of an agreement with a competitor.
- Never make agreements with competitors that set terms for bidding (such as price terms).
- Do not ensure or gather bids beyond Agilent.

Offer products on merit

- Present our products and services based on their quality and value. Let the customer decide what is best for them. Don't bundle or tie purchases of products together unnecessarily.

Marketing and Selling Agilent Products *(continued)*

Truthful Marketing Materials

In mass spectrometry, we identify the chemical properties of molecules based on their mass information. Similarly, we can identify the properties of truthful marketing by studying our materials.

Here are a few properties all truthful marketing materials have in common.

- Include features and benefits for products and services. Do not overstate product capabilities.
- Present data with appropriate citations and references.
- Do not include words or images that may mislead customers.
- Use information that is correct, reviewed, and approached through content processes governing promotional materials.
- Only promote products or services that have received the necessary approvals in your market.
- Clearly indicate the approval/regulatory status of the products discussed.

These properties should be a constant, no matter which Agilent product or service we're promoting or selling. They help us uphold our commitment to fairness, honesty, and **uncompromising integrity**, and build **trust** with our customers and in the marketplace.

All Agilent marketing materials must be reviewed and approved prior to distribution. This control helps us reduce the risk of improperly promoting our products.

Comparative Marketing Tactics

Some countries may prohibit comparative claims. For example, in the European Union, all product / service comparisons must comply with the European Directive on Comparative Advertising.

Check with our Legal Department before including any comparisons in marketing campaigns.

KEY LINKS

Discount Policy
Sales Policies
Antitrust Policy
Agilent Ad Review



Cell Analysis
Product Lineup

Theft in the Workplace

In the world of infectious diseases, viruses and bacteria steal the resources we need to stay healthy. In the same way, theft in the business world weakens companies and exposes us to risk.



Four Forms of Theft

Here are the most common types of theft in the workplace.



Stealing physical property from Agilent or another party

- Office supplies
- Equipment
- Parts/products



Stealing intellectual property from Agilent or another party

- Patents
- Trademarks
- Copyrights
- Trade secrets
- Technical data / software
- Confidential information



Falsifying financial records

- Receipts / expense reports
- Time cards
- Financial information



Plagiarizing (stealing) the copyrighted work of others

- Books
- Articles
- Images
- Videos
- Music
- Other forms of expression

KEY LINKS

Compliance Helpline
Expense Policy Portal
Brand Portal

Agilent has many policies that address theft, including several expense policies. It is important to know the policies and be on the lookout for acts of theft. If you see something, say something!

The Spark starts with YOU

Building Ethical Business Relationships



Our products provide trusted answers in a variety of industries — from cancer research to energy, and even food and beverage testing. Each of these industries employs different people — including doctors, nurses, government officials, and research scientists. If we want to do good, clean business, we need to understand each group and how to work with them.

USING OUR KNOWLEDGE WISELY

Knowing our **partners** means that we...

Conduct appropriate, risk-based due diligence, and use our standard agreements. Ensure that they understand and agree not to engage in improper or illegal activities.

Knowing our **suppliers** means that we...

Ensure that they agree to our Supplier Code of Conduct and follow ILO conventions and applicable laws and regulations.

Knowing our **customers** ensures that we...

Don't do business with parties or entities subject to trade restrictions or involved in illegal acts.

Holding Our Partners to a High Standard

While it's simple to be accountable for your own actions, Agilent and its employees may also be responsible for those we do business with. If they offer or make corrupt payments or bribes on behalf of Agilent, we're responsible. This could lead to lawsuits, fines, and even jail time.

Who we do business with:

- Channel partners/intermediaries
- Agents
- Consultants
- Suppliers
- Other third parties

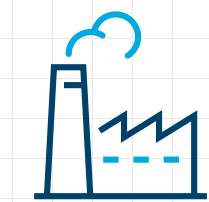
What we need to know about them:

- Who they are
- What their reputation is for operating honestly and ethically
- Which business practices they employ

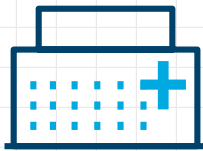
Building Ethical Business Relationships *(continued)*

Sensitive Customer Categories

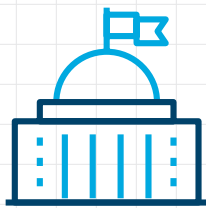
When we think about Agilent customers, we can put most customers into three categories: General Commercial, Healthcare Organizations and Professionals, and Government Entities and Officials. Interacting with our customers in healthcare and government requires special treatment to ensure we are in compliance with applicable laws and regulations.



General Commercial



Healthcare



Government

Healthcare Professionals and Organizations

Whether they're our customers or our suppliers, the key ingredient in our relationships with healthcare professionals (HCPs) and healthcare organizations (HCOs) is **respect** — for their occupation, their business transparency, and most importantly, their patients. It's our goal to help them choose products based on their patients' needs (free from industry influence) and to disclose our interactions with them as required for transparency.

Government Officials and Entities

We work with government entities (GE) and government officials (GO) in many aspects of our business. They may participate in bids and tenders, help us secure licenses and regulatory approvals, or be the recipient of our marketing materials. No matter how we work with them, it's vital that we're transparent, fair, and ethical.

To learn more about interactions with our sensitive customer categories, reach out to Global Legal Compliance for questions and additional resources.

KEY LINKS

Supplier Code of Conduct
Standards of Business Conduct Hub



By understanding who you're working with and how to collaborate effectively, you improve our reputation and our performance.

The Spark starts with
YOU

Waldbronn, Germany

Corruption, Money Laundering, and Trade Compliance



In science, corruption can degrade a sample and negatively impact our results. Business corruption works the same way. Illegal and unethical practices like bribes and money laundering undermine the integrity of our business and the world economy. That’s why it’s so important to combat corruption when we see it — and uphold Agilent’s processes that ensure honesty and transparency.

Agilent has a no tolerance policy for bribes and money laundering.

Bribes Corrupt Our Relationships and Reputation

You’re probably familiar with the concept of a bribe. It’s an attempt to unfairly influence decisions by offering something valuable in return. Bribes can lead to corruption, which erodes **trust** and damages our reputation and relationships. We’re committed to keeping Agilent a place of **uncompromising integrity**.

At its core, Agilent’s stance is this: *Bribery is illegal. We do not tolerate bribery in any form.*

Our Expectations for Employees

1. Do not give, or promise to give, anything of value to gain a business advantage to the customer or a customer’s interested party. For example, donating to a preferred charity.
2. Do not accept any gifts or promises meant to influence business decisions.

Spotting a Possible Bribe

We trust that you would never willingly accept or offer a bribe, but bribes can be tricky to identify. In your work, you may encounter them in many different forms. Look out for hard to identify bribes, including:

- Favors
- Free or heavily discounted products
- Kickbacks
- Donations
- Offers of entertainment or travel

If you are unsure whether the offer of the gift or item of value is a bribe, check with your manager or contact the Legal Compliance Team.

Preventing Money Laundering from Contaminating the Global Economy

Have you ever wondered how individuals or organizations disguise the proceeds of their criminal activities? The answer is money laundering. Criminals “clean” their profits through legitimate business transactions. It’s as devious as it sounds, and you can help prevent it from happening by ensuring we properly vet our customers and end users.

You can help prevent money laundering by...



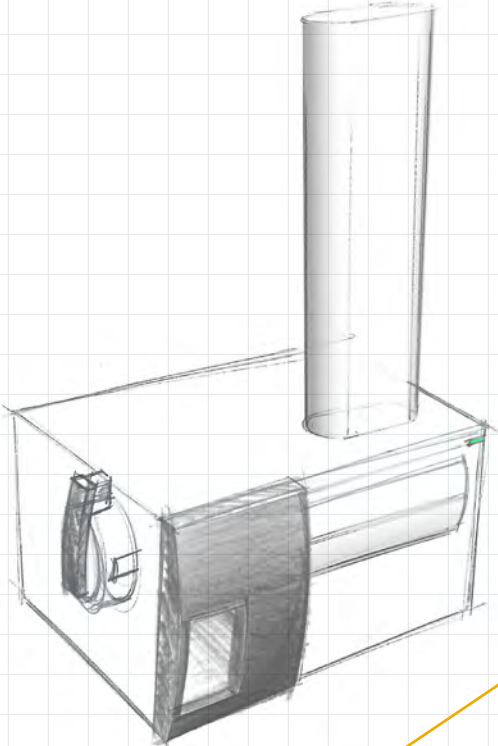
Doing business with reputable people and organizations



Watching out for suspicious activities like large cash payments or strange fund transfers



Reporting any suspicious activities you see or suspect



6470 TQ and 6530 QTOF preliminary design sketch

Corruption, Money Laundering, and Trade Compliance *(continued)*

Import and Export Laws

Agilent operates all over the world, so we need to follow U.S. and international trade laws. We also need to ensure our partners understand and follow these trade laws. You can do your part by taking Agilent’s Import and Export Training and contacting the Global Trade team for more information.

Meet your trade experts

Agilent’s Global Trade team is here to answer your questions and help you follow all laws and regulations.

Accurate Accounting and Financial Reporting

In science and business, one wrong number can lead to a lot of headaches. At Agilent, we have controls and processes that support proper accounting and financial reporting. We know one of the most powerful ways we can foster trust with our customers, business partners, and shareholders is by providing honest, accurate, and complete financial data. Plus, seeing a clear picture of our transactions helps us spot risks like corruption, money laundering, and others more easily.

KEY LINKS

Global Anti-Corruption Policy
Global Trade Teams
Compliance Helpline

By reporting suspected bribes and money laundering, you give us the opportunity to stop harmful behaviors, such as forced labor, before they get worse. With your help, we can make the world a safer place for everyone.

The Spark starts with YOU

GC 8890 preliminary design sketch

Business Gifts and Entertainment



Like two atoms swapping electrons, gift giving and receiving can be a tricky business. Ignoring the rules could lead to conflicts of interest, or, at worst, violations of the law. We’ve broken down what you can accept and what you can give, so there’s no confusion when it comes to expressing your gratitude (or receiving thanks).

What You Can Accept

In many parts of the world, you can accept gifts of reasonable value from those we do business with. Any gift you accept should not be intended to sway your decision making. Gifts you can accept include:



Modest meals



Appropriate entertainment



A gift basket

What You Can Give

The rules for giving gifts are similar to those for accepting gifts, including Agilent promotional items or other non-Agilent branded gifts. Gifts should only be given occasionally, and they should be of reasonable value. However, the rules may be different depending on the recipient of the gift (e.g., HCPs and GOs).

Philanthropy

At Agilent, we are proud of the volunteer and philanthropic activities of our business and our employees. Our Agilent Foundation supports corporate giving in our areas of focus. We also have programs such as volunteer time off and matched giving for employees who want to give back.

KEY LINKS

Expense Policy Portal
Standards of Business Conduct Hub
Philanthropy at Agilent

You must timely and accurately record any gift, meal, or entertainment you give in connection with your job, and use the correct expense code when filing your expense report.

The Spark starts with YOU



High-performance
Liquid Chromatography Lab

Acting as an Agilent Team

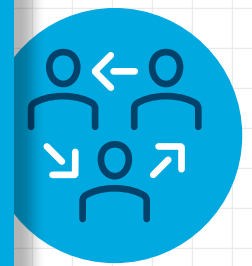


What does it mean to be a member of our Agilent team? That's what we'll dig into in this next section of our SBC. Every subject we discuss can be applied to your daily work— and they all rely on the same principle: *do the right thing*. Every time you choose to do right, you strengthen our team.

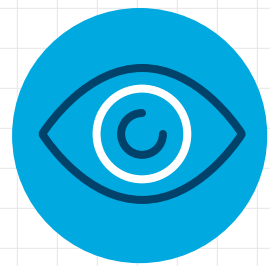
Working with people from all over the world. Experiences, perspectives, and ideas. It's all about **teamwork**, free from harm and hostility, and **respect**.

Business thrives when we bring together team members from all over the world. It's not enough to have a diverse team—we need to

Conclusion at Agilent:



Consider diverse perspectives
Embrace new ideas and perspectives. Be willing to learn from people with different experiences.



Recognize your unconscious biases
Be aware of your personal assumptions. Let the words and actions of others define their character.

Be the elements of safety and respect to everyone for all. Employment decisions are based on qualifications.

TABLE OF CONTENTS

- INTRODUCTION
- GUIDING PRINCIPLES AND PRACTICES
- INNOVATING WITH INTEGRITY
- GOOD, CLEAN BUSINESS PRACTICES
- ACTING AS AN AGILENT TEAM



High-performance
Liquid Chromatography Lab

Acting as an Agilent Team

Here are the topics we'll cover
in this section:

- ✓ Diversity and Inclusion
- ✓ A Safe Workplace

Diversity and Inclusion



At Agilent, we have the privilege of working with people from all over the world. Each person brings their own unique experiences, perspectives, and ideas. It's our goal to foster a supportive culture of **teamwork**, free from harm and hostility, where everyone is treated with dignity and **respect**.

The Power of Diversity and Inclusion

Diversity is the catalyst that drives innovation. Our business thrives when we bring together team members from varying backgrounds. But it's not enough to have a diverse team — we need to make sure every person feels included.

Here are a few ways you can promote diversity and inclusion at Agilent:



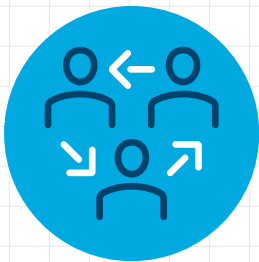
Keep an open mind

Not everyone shares the same life experiences. Approach every work interaction with empathy and curiosity.



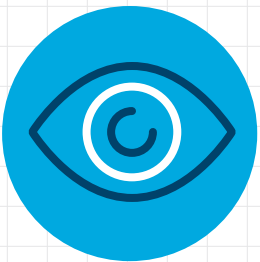
Listen before you speak

Give yourself time to consider other viewpoints. Reflect on all aspects of the discussion so you can respond thoughtfully.



Consider diverse perspectives

Embrace new ideas and perspectives. Be willing to learn from people with different experiences.



Recognize your unconscious biases

Be aware of your personal assumptions. Let the words and actions of others define their character.

The Chemistry of Equal Opportunity

Agilent is an equal opportunity employer. We combine the elements of safety and respect to create business practices that ensure fair treatment for all. Employment decisions are based on our business needs and each candidate's qualifications.

Diversity and Inclusion *(continued)*

Discrimination and Harassment

A cell's health depends on its environment. If a virus invades, the cell will struggle to survive. It's no coincidence that people are the same way. Harassment and discrimination are toxic to everyone — which is why we don't tolerate them in any form in or around our work environment.

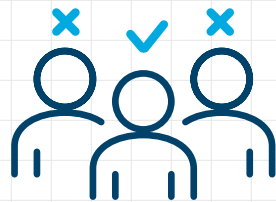
Harassment

When someone repeatedly makes you feel uncomfortable or unsafe through their words or actions



Discrimination

When someone treats you differently because of a protected characteristic like your race, gender or age



If You Notice Something Wrong, Speak Up

You help create a fair workplace for everyone by speaking up when you suspect discrimination or harassment. Here are some things to look out for:

- Abusive language or visuals
- Discriminatory language or actions
- Threats or intimidation
- Improper touching
- Bullying and/or harassment

Retaliation is Never Allowed

When you're deciding whether to report a concern, you might be fearful that it could lead to retaliation against you. We have a strict anti-retaliation policy at Agilent. *This means we prohibit retaliation against anyone who makes a report in good faith and against anyone who assists as a witness in any investigation.*

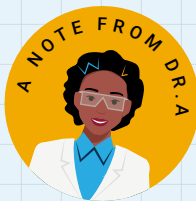
KEY LINKS

Harassment Prevention Policy
Anti-retaliation Policy



A Safe Workplace

Just like our Insight200M Liquid Explosive Detection System keeps people safe by detecting explosives through opaque barriers, Agilent is also committed to keeping our employees safe in our workplace. By ensuring we treat people with **respect**, we can achieve our goal of maintaining a healthy work environment.



A Violence-free Workplace

Agilent has zero tolerance for actions that threaten or have the potential to threaten the safety of our employees, customers, suppliers, or others in our workplace. We rely on you to promptly report any violent or potentially violent acts, including behavior that:

- Is verbally threatening or intimidating
- Suggests the destruction of company property
- Threatens the use of firearms, bombs, or weapons

Substance Abuse

Substance abuse harms job performance and safety for you and your colleagues. Unauthorized use, possession, distribution, purchase, or sale of drugs or alcohol on company property, time, or at events is prohibited.

Alcohol may be allowed during company business if compliant with laws and policies, done in moderation, and does not impair performance or judgment. Never operate machinery or vehicles under the influence.

You can report concerns of safety and violence to the Agilent Compliance Helpline or to Agilent Global Security.

KEY LINKS

Global Security
HR Hub
Compliance Helpline

We are all **accountable** for ensuring we have a safe and violence-free workplace. If you see something of concern, say something.



As we come to the end of our SBC, I encourage you to take a moment and reflect on what you've learned – and the impact you can make.

As one of about 17,000 Agilent employees across the globe, it can be easy to feel like your actions aren't that important. But trust me, they are.

Your everyday decisions spark a chain reaction that leads to some of humanity's greatest achievements. Cutting-edge treatments for cancer. New vaccines. Improvements in identifying genetic diseases. Quality air, food, water, and energy. Science that changes lives for the better, every day.

That's what we mean when we say, **the spark starts with you.**

Use our SBC to guide your decision making, but don't forget about the other resources you have here at Agilent. Our internal SBC site can serve as your central hub for related policies and resources. Your leaders can answer your questions, address your concerns, and help you act with **Uncompromising Integrity**. So don't be afraid to reach out.

Together, we can help Agilent provide trusted answers to our customers and improve the quality of life across the globe.

Dr. A

