

Miltenyi Group Antitrust and Fair Competition Policy

Purpose	Scope
<p>Within the Miltenyi group, we are committed to fostering a business environment rooted in fairness, integrity, and compliance with all applicable antitrust laws. This policy reflects our dedication to upholding fair competition, ensuring ethical conduct, and maintaining trust with all stakeholders while avoiding any practices that could improperly harm market competition.</p>	<p>This policy applies to all employees, business units, and operations globally, outlining the standards for compliance with applicable antitrust and competition laws. It addresses interactions with competitors, customers, and partners, and sets clear guidelines to prevent anti-competitive practices, ensuring fair dealings across all markets we operate in.</p>

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1. Key principles

1.1 Put Patients and Research First

Our decision-making prioritizes the advancement of science, patient benefit, and safety. We strive to provide innovative solutions that enhance global healthcare standards while complying with applicable competition laws and ensuring access to our products and services.

1.2 Compete on the Merits

Companies of the Miltenyi group competes based on the quality, price, and innovation of its products and services. By fostering healthy competition, we drive innovation and deliver value to customers, healthcare systems, and society.

1.3 Make Decisions Independently

All business decisions are made independently, avoiding any form of collusion with competitors. Interactions with competitors are limited to legitimate, procompetitive purposes and require consultation with Legal department when necessary.

1.4 Safeguard Commercially Sensitive Information

Protecting commercially sensitive information (“CSI”) is critical. CSI must not be shared with competitors unless legally permissible and approved by Legal department, especially in collaborations or industry discussions.

1.5 Communicate Responsibly

Clear, accurate, and responsible communication is essential. Internal and external communications should align with legitimate business objectives, avoid misleading statements, and comply with applicable competition laws and ethical standards.

1.6 Prohibited Anticompetitive Agreements

In compliance with applicable antitrust laws, the Miltenyi group prohibits and does not condone agreements with competitors that harm market fairness, including but not limited to price fixing, market sharing, bid rigging, or collective boycotts. If approached regarding such matters, employees must consult Legal department immediately.

1.7 Information Sharing

Companies of the Miltenyi group do not share or solicit CSI with competitors. Legitimate competitive intelligence may only be gathered from public sources. Unintentional sharing of CSI must be rejected, not circulated, and reported to Legal department.

1.8 Industry Associations

Participation in industry associations must not involve discussing CSI or entering into anticompetitive agreements. Employees should consult Legal department before participating in such meetings and shall protest and exit immediately if improper discussions occur.

1.9 Agreements with Purchasers and Suppliers

The Miltenyi group prohibits and does not condone agreements that fix resale prices, limit customer territories, or otherwise inadmissibly restrict competition. Legal department must review any exclusive agreements or resale restrictions before implementation.

1.10 Abuse of Dominance

Employees must avoid practices that exploit market power to restrict competition, such as predatory pricing or exclusive contracts. Strategies involving intellectual property must not exceed legal limits and require consultation with Legal department.

1.11 Mergers, Acquisitions, or Collaborations

Proposed mergers, acquisitions, or collaborations must be reviewed by Legal department to ensure compliance with antitrust laws. Notification to competition authorities may be required.

2. Conclusion

The Miltenyi group is committed to upholding antitrust and fair competition laws, fostering innovation, and delivering value to society. Compliance with this policy is essential to maintain our ethical standards, protect our reputation, and ensure long-term success. Employees are encouraged to consult Legal department whenever in doubt to align with these principles and avoid potential violations.

3. Policy Approval

Version	Date	Approved by
1.0	28.02.2025	Dr. Boris Stoffel (Managing Director)