



## **Business Partner Code of Conduct Effective October 2019**

Fluidigm Corporation is committed to conducting its business ethically, legally, and in a socially responsible manner. We expect all our business partners, including our distributors, suppliers, vendors, contractors, agents, and all third parties who provide products or services to us, to share this commitment.

This Business Partner Code of Conduct (the "Code") applies to all your activities that relate directly or indirectly to Fluidigm Corporation or any of our subsidiaries (collectively, "Fluidigm"), and defines the minimum standards of business conduct and practice we expect you to comply with in your relationship with us. You must also comply with all other applicable laws, regulations, and codes of the countries in which you operate. You must work with your own business partners to ensure they also strive to meet the principles of this Code or equivalent principles.

Failure to comply with the terms of this Code may result in the termination of our business relationship.

### **Environment, Health, and Safety**

We expect you to comply with all applicable environmental, health and safety laws, rules, and regulations. We encourage you to do business in an environmentally responsible manner that minimizes adverse impacts on the environment, to conserve natural resources, avoid the use of hazardous materials where possible, and engage in activities that reuse and recycle. We expect our suppliers to use materials that are environmentally safe and sourced from socially responsible suppliers.

You must be committed to creating safe working conditions and a healthy work environment for all of your workers. You must provide appropriate controls, safe work procedures, preventative maintenance, and protective measures to mitigate health and safety risks in the workplace.

You must identify and assess emergency situations and minimize their impact by implementing emergency plans and response procedures (including emergency reporting, employee notification and evacuation, worker training, fire detection and suppression equipment, and adequate exit facilities).

### **Labor and Human Rights**

You must commit to uphold the human rights of workers and employ them according to local working laws and regulations, including those concerning working hours, overtime, wages, and legally mandated benefits. We expect you to create and maintain a work environment where all employees are treated fairly with dignity and respect, and where discrimination, harassment, coercion, and retaliation are prohibited.

You must not employ under-age labor as described in the International Labour Organization's Minimum Age Convention 138 and Worst Forms of Child Labour Convention 182. You must comply with all applicable labor laws, rules, and regulations, including but

not limited to, all laws forbidding the solicitation, facilitation, or any other use of slavery, servitude, forced or compulsory labor, or human trafficking, as those terms are used in the California Transparency in Supply Chains Act of 2010 (Cal. Civil Code Section 1714.43) and the UK Modern Slavery Act 2015.

We expect you to respect, within the framework of local laws and established practices, the principles of Article 2 in the Freedom of Association and Protection of the Right to Organize Convention 87 and Articles 1 and 2 in the Right to Organize and Collective Bargaining Convention 98 of the International Labour Organization. You have the right to establish favorable employment conditions and to maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

### **Nondiscrimination**

You must not unlawfully discriminate on the basis of race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, veteran status, marital status, or any other characteristic protected by applicable law.

We expect you to provide equal remuneration and to respect, within the framework of local laws and established practices, the principles of Article 1 in the Equal Remuneration Convention 100 and Article 1 in the Discrimination (Employment and Occupation) Convention 111 of the International Labour Organization.

### **Ethical Conduct; Fair Competition**

You must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, customers, and business partners. We expect the highest standards of integrity in all business interactions. You must uphold standards for fair business, advertising, and competition. All forms of corruption, extortion, and similar practices are prohibited.

You must not offer, pay, request, or accept bribes or participate in other illegal inducements in business or government relationships. When dealing with others, including Fluidigm associates, you must exercise reasonable due diligence to ensure they will not offer, pay, request, or accept illegal inducements, including bribes. You must comply with all applicable anti-corruption laws, rules, and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, and the standards enacted under the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

### **Responsible Sourcing**

Fluidigm supports responsible sourcing practices, which includes compliance with the Conflict Minerals provision of the Dodd-Frank Act. As a result, we expect our suppliers to design and implement reasonable processes to ensure that all products supplied to us are "DRC Conflict Free," as defined under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Suppliers are additionally expected to assist us with our conflict minerals compliance by making a reasonable, good-faith effort to answer any questions and to provide all materials we may request regarding this initiative.

### **Compliance; Requests for Information**

You must comply with all applicable laws, regulations, rules, guides, ordinances and/or standards. Upon our request you will also be expected to provide us any and all information

or material required for us or our customers, to comply with all laws, regulations, rules, guides, ordinances and/or standards.

You must never engage in any activity prohibited by this Code by knowingly employing—or failing to impose appropriate corrective action upon—a subcontractor or supplier who performs the prohibited activity on your behalf.

We may request information about your compliance with this Code at our discretion or as required by law. You must provide timely and complete responses to these information requests. We also reserve the right to verify your compliance with this Code through audits or other assessment mechanisms.

### **Questions and Concerns**

We seek to promote a culture of honesty and transparency in our business. Any questions or concerns about the requirements of this Code or the conduct of a Fluidigm representative should be communicated to your Fluidigm point of contact. If the nature of the question or concern requires communication with the management of Company, you should contact us directly at [compliance@fluidigm.com](mailto:compliance@fluidigm.com).

### **Reporting**

Business partners and their associates are invited to report actions inconsistent with this Code by writing to [compliance@fluidigm.com](mailto:compliance@fluidigm.com), by using our online reporting tool at <https://www.convercent.com/report>, or calling our ethics hotline number below:

#### Ethics Hotline

- From the U.S. or Canada, call (800) 461-9330.
- From other countries, call (800) 1777-9999.

All cases of questionable activity or improper conduct will be reviewed for appropriate action. There will be no reprisal against a business partner simply for the good faith reporting of a violation or suspected violation, or for making an inquiry about the appropriateness of an anticipated course of action.

Thank you for doing your part to create and maintain an ethical business environment.