

Code of Conduct



METTLER TOLEDO

A Message from the CEO



METTLER TOLEDO is a strong company. We have achieved our success through an unwavering focus on innovation, serving our customers' needs, and supporting our culture.

It is our valued and engaged employees who make a difference every day. Each of us contributes, and together, as One Team, we grow stronger as a Company.

Our strength is built on a solid foundation that is anchored by our purpose, core values, and principles of respect and integrity for each other and for all our stakeholders. This guides us to do the right thing and helps us enhance the business and safeguard our reputation.

Please take time to read our Code of Conduct and continue to follow the principles they contain. In this way, we can uphold what makes METTLER TOLEDO resilient and successful.

Patrick Kaltenbach,
President and Chief Executive Officer

Code of Conduct



Introduction We Perform with Integrity

“We Perform with Integrity” is a fundamental value that supports all our Corporate Values.

We build our success on our reputation for lawful and ethical behavior. We must always conduct our business ethically and legally. This enhances and protects our reputation and is the only way for us to succeed in the long run.

We define our culture of ethical and legal compliance as, “We Perform with Integrity.” This requires an uncompromising commitment to honor all relevant laws and consider values such as honesty, candor, fairness, reliability, respect, and trustworthiness when making business decisions. Our Code of Conduct further defines the way that we do business and is applicable to all METTLER TOLEDO employees, including senior management and the Board of Directors.

Responsibilities

We all have the responsibility to:

- Follow these standards. We must be familiar with the law and our Code of Conduct as they apply to our jobs. Failure to follow our Code of Conduct can result in disciplinary action, up to and including termination of employment.
- Report violations of these standards. Addressing problems early is the only way we can resolve them before they cause harm. Failure to report a violation or suspected violation and refusal to cooperate with an investigation of a violation or suspected violation are breaches of our Code of Conduct.
- Speak up if you are unsure of what is expected of you by METTLER TOLEDO or if you are unsure whether a violation has occurred. When in doubt, discuss the issue with your supervisor, human resources, Legal/Compliance, or follow the directions in **How to Get Help**.

Guidance

We will each encounter a variety of ethical and legal questions in our work. We must respond to these questions in a manner that is consistent with our core values and both the letter and the spirit of the law. Our Code of Conduct provides general guidance for resolving a variety of legal and ethical questions. You can find more detailed guidance on our specific policies in the MT Guidelines.

Applying common sense, good judgment, and integrity to all your business dealings will help ensure your decisions are consistent with our values and this document. At the same time, we appreciate that no guideline can apply in every situation, and there will be times when you have questions.



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Ethical Decision Making and How to Get Help

If a question of how to behave involves a matter of law, our course is clear and unambiguous—we always follow the law. But often questions are not so straightforward, particularly if we do not have all the relevant information. The best course of action is to methodically approach solving difficult problems. If you are unsure what to do in any situation, be sure that you understand the facts as best you can and seek guidance before you act. Start by asking yourself:

1. What specifically did you observe or are you being asked to do? This should allow you to focus on the specific issue you are facing and what alternatives you may have.
2. Can we do it? If the proposed action is not legal or not compliant with METTLER TOLEDO policies, we cannot do it.
3. Should we do it? Is it fair, ethical, and consistent with our values? If a course of action seems unfair, examine why it seems unfair and who might be harmed. Is it a customer? The Company? Other employees?
4. Is it a good idea? Will the action maintain or improve our culture, reputation, and business even if reported in the news or on social media?
5. What is your responsibility? Many situations we face involve shared responsibility. Are the other potential parties informed? By getting others involved and discussing potential issues, a good course of action usually comes to light.

If you still do not know how to proceed, discuss the problem with your supervisor. In most cases, your supervisor will have a broader perspective and will appreciate being brought into the decision-making process before it is too late. In the rare case where it may not be appropriate to discuss an issue with your supervisor, you can consider discussing it locally with your General Manager or Human Resources Manager.

Business Partners

Our third-party relationships are important: they allow us to meet our customers' expectations, and our third parties' actions affect our reputation. We choose our third parties carefully and strive to partner only with third parties that share our values and operate their businesses responsibly. Employees should communicate our **Business Partner Code of Conduct** to third parties to inform them of their responsibilities in upholding our values. The Business Partner Code of Conduct applies to all our business partners, including our sales channel partners and our supply chain partners, and compliance is a condition of doing business with us.

Variations

In certain circumstances, local variations to our Code of Conduct may be necessary to take into account differing regulatory and business environments. If a local law conflicts with our Code of Conduct, you must comply with the law. Local policies may not otherwise be less strict than our Code of Conduct.

Employment Practices, Inclusive Workplace, and One Team Culture

Our employees are the lifeblood of our Company. We work together with fellow employees worldwide towards common goals and are a team of many thousands of people around the globe. We foster an inclusive One Team culture and believe in treating each other with respect and fairness at all times. We value the differences of diverse individuals from around the world and want to leverage the diverse thinking, skills, experience, and working styles of our employees. As such, we aspire that our workforce also reflects the mix of people and communities in which we operate.

METTLER TOLEDO is an equal opportunity employer. We base all employment decisions on business reasons, such as qualifications, talents, and achievements, and must comply with local and national employment laws. To help us meet our goal of being an equal opportunity employer, we follow an open-door policy and a complaint resolution process within each of our Business Units. You can find more details in our **Equal Employment Opportunity** policy.

We are committed to providing a working environment that is free of unlawful harassment and discrimination. Abusive, harassing, or offensive conduct is unacceptable, and we will not tolerate it, including, but not limited to, derogatory comments and unwelcome sexual advances. If you feel that you have been harassed or discriminated against, please speak out and immediately report the behavior (see **How to Get Help**).

Human Rights

We acknowledge and are guided by the principles outlined in the International Labour Organization Declaration on Fundamental Principles and Rights at Work and are committed to promoting human rights in our operations and in the operations of our business partners. We must not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced labor, or human trafficking.

Conflicts of Interest

We must base business decisions and actions on the best interests of METTLER TOLEDO, and we must not allow our personal considerations or relationships to motivate our decisions. A conflict of interest can arise when you take an action or have interests that affect your judgment or divide your loyalty between METTLER TOLEDO and another party (including yourself). Relationships with potential or existing employees, suppliers, distributors, customers, or competitors must not affect your independent and sound judgment on behalf of METTLER TOLEDO. We also must avoid the appearance that a conflict of interest may exist.

The best policy is to avoid any direct or indirect business connection with our suppliers, customers, or competitors, except on our Company's behalf. You or a member of your family may not receive any improper personal benefit by virtue of your position in our Company. If you have, or are unsure if you have, a conflict of interest you must immediately report it to your supervisor, human resources, or Legal/Compliance. To help you make informed decisions, we address some common types of conflicts here.

Assisting a Competitor

While you are employed by METTLER TOLEDO (part-time or full-time), you may not provide assistance or information to an organization that markets products or services in competition to our Company or which may harm our Company.

Personal Financial Interests

You and your immediate family members may not have a financial interest in any organization that we do business with or compete with if that financial interest would give you a conflict of interest, or the appearance of a conflict of interest, with METTLER TOLEDO.

Conflicts of interest are not always obvious. Consult with your supervisor if questions arise. You are also encouraged and expected to report suspected conflicts of interest to your supervisor, human resources, or Legal/Compliance, as appropriate (see **How to Get Help**).

Corporate Opportunities and Assets

You must advance our Company's legitimate interests when the opportunity to do so arises. Unless you have the Company's consent, you are prohibited from:

- taking for yourself opportunities that are discovered through the use of corporate property, information, or position;
- using corporate property, information, or position for personal gain; and
- competing with our Company, whether directly or indirectly.

One of our core values is, "We Use Resources Wisely." Protect our assets and ensure their efficient use: theft, carelessness, and waste have a direct impact on our Company's profitability. Without prior approval, you may not perform work for anyone other than METTLER TOLEDO while on Company time or premises. Full-time employees may not have employment with any third party without obtaining prior written approval from their supervisor. Without prior written approval, you are not permitted to use METTLER TOLEDO property, including computers, telephones, or other resources, to perform work for anyone other than METTLER TOLEDO.

Communications with the Public

We have a responsibility to make timely and accurate disclosures of our financial results and other significant corporate information. At the same time, we are subject to strict rules regarding all such disclosures. Our policy is to make full, fair, accurate, timely, and understandable disclosures in all public communications, including filings and submissions to the Securities and Exchange Commission.

The only people authorized to speak to the public on behalf of METTLER TOLEDO regarding our financials and other Group matters are the Chief Executive Officer, the Chief Financial Officer, and the Head of Investor Relations. All inquiries concerning METTLER TOLEDO from the media, financial analysts, or the general public must be referred without comment to the Head of Investor Relations. More details can be found in Guideline **MT 011**.

Insider Trading Policy

Insider trading laws prohibit people from trading in securities based on nonpublic, material information. These laws also prohibit passing on such information to anyone else. We share a common interest in avoiding insider trading liability and keeping such information confidential. You may not trade in the securities of any company based on inside information learned during the course of your work for METTLER TOLEDO. Guideline **MT 022** contains the full insider trading policy applicable to all employees within the METTLER TOLEDO group.

Directors and officers of METTLER TOLEDO International Inc. and certain other designated employees identified by the Legal Department are subject to additional restrictions on their ability to trade in METTLER TOLEDO securities. More details can be found in Guideline **MT 023**.

Environmental Compliance

METTLER TOLEDO is committed to doing business in an environmentally responsible manner that minimizes adverse impacts on the environment. All employees are responsible for ensuring that we conduct our business in compliance with applicable laws and in a manner that is protective of the environment.

We strive to use resources in our operations wisely and reduce emissions in all areas. We encourage the conservation of natural resources, avoid the use of hazardous materials where possible, and engage in activities that reuse and recycle materials. Employees are required to notify management if hazardous materials come into contact with the environment or are improperly handled or discarded.

Health and Safety

We strive to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety rules and practices and promptly reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Product Quality and Safety

We have earned a strong reputation for quality, and our customers associate our METTLER TOLEDO brand with quality and innovation. We must always strive to provide safe, reliable, and high-quality products to our customers. We follow all applicable laws and regulations regarding product safety and are committed to manufacturing our products in compliance with required specifications and applicable regulations. Employees must report any concerns regarding product safety or compliance to their supervisor, General Manager, GMC line management, or Legal/Compliance.



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Competition and Antitrust

It is our policy to abide by competition and antitrust laws. We are committed to succeeding while maintaining the highest standards of responsibility and ethics. We support free enterprise and will compete fairly and ethically within the framework of applicable competition and antitrust laws. Although these laws vary from country to country, their common purpose is to prohibit certain business practices and conduct that prevent or unreasonably restrain fair competition. The following activities are examples of potentially problematic behavior between competitors: agreeing to market prices, dividing customers or markets, and setting limits on production.

Unlawful practices can result in criminal and civil penalties applying to our Company and the involved individuals. Because of the complexity of competition and antitrust rules, legal counsel must review any agreements with a competitor, or any agreements with other parties that may have a potential negative effect on competition. More details can be found in Guideline **MT 025**.

Fair Competition

We must each endeavor to deal fairly with our customers, suppliers, competitors, and employees. Employees may not take unfair advantage of anyone including, but not limited to, through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. We may legitimately collect information on customers and markets, but we will not seek business intelligence by illegal or unethical means. Stealing proprietary information, obtaining trade secret information without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. It may also be unethical to use information obtained accidentally or provided to us by unknown sources. We must uphold standards for fair advertising and be fair, factual, and complete in our marketing, sales, and promotional materials.

Intellectual Property

Our intellectual property helps us deliver the amazing solutions that separate us from our competition and make us market leaders. Intellectual property is a Company asset found in the creative ideas that lead to innovations and advancements in our products and technologies. We think of intellectual property most commonly as our inventions, patents, trademarks, and copyrights.

Any intellectual property that we develop while doing our jobs for METTLER TOLEDO belongs to our Company. We must be alert in identifying our intellectual property, taking appropriate steps to protect our intellectual property, and making sure that our intellectual property is used only for the benefit of METTLER TOLEDO. More details can be found in Guideline **MT 030**.

Confidential Information and Information Handling

In addition to our intellectual property, we have a wide variety of confidential information that is not known or available outside the Company and would be valuable to our competitors or other third parties. Some examples include technical know-how, research and development data, manufacturing methods, cost figures, business plans and strategies, employee information, marketing strategies, installed base data, customer and prospect data, contact information, financial information, and software source code. In the course of business, we also sometimes receive the confidential information of a third party.

We must take proper steps to protect information and keep it secure according to its proper classification (see Guideline **MT 050**), including confidential information, whether ours or that of a third party. Our Company will vigorously pursue any unauthorized disclosures of confidential information. Your obligation to protect our confidentiality of information (including our intellectual property) continues even after your employment with METTLER TOLEDO ends.

In special cases, we may share our confidential information with an outside party, including service providers. In all such cases, an appropriate agreement must be signed in advance, ensuring the partner treats the information confidentially, keeps it secure, and only uses it for our legitimate business purposes. Sample agreements are available on the Legal WIKI under Contracting/MT Standard Agreements.

You may also have access to information as part of your job that may not be shared even within METTLER TOLEDO. Personal information regarding other employees or job applicants and information concerning Company strategy may only be shared with those who have a business need to know and can only be used for legitimate and authorized purposes. More details can be found in Guideline **MT 050**.

Data Privacy

We must comply with all relevant data privacy and protection laws. These laws may be broad, and often include restrictions on collecting, storing, processing, using, and transferring certain types of information. These laws usually relate to personal information (e.g., information relating to individuals, like employees and customer contacts), but what information constitutes personal information is broad and not always obvious. You should consult with the Legal Department if there is any uncertainty. More details can be found in Guideline **MT 052**.

Records and Record-Keeping

We require honest and accurate recording and reporting of information in order to make responsible business decisions and to enable us to properly inform our investors.

We must maintain all of the Company's books, records, accounts, and financial statements in reasonable detail, appropriately reflecting the Company's transactions, and in conformance both to applicable legal requirements and to the Company's system of internal controls, including the Controller's Manual. Unrecorded or "off the books" funds or assets may not be maintained.

All employees involved in the preparation of public disclosures, including of the Company's financial statements and the periodic reports required to be publicly filed by the Company, must seek to ensure that these disclosures are full, fair, accurate, timely, and understandable.

Business records and communications often become public, and employees should avoid exaggeration, derogatory remarks, guesswork, and inappropriate characterizations of people or companies that could be misunderstood. Employees have a responsibility to manage documents and make decisions on document retention, but you may never alter or destroy records that might relate to any pending investigation, legal claim, or legal proceeding.

Use of Email, the Internet, and Other Technologies

We provide employees with computer systems and access to other technologies, including email, access to the Internet, and other emerging technologies like generative artificial intelligence. These Company-provided technologies, whether internally created or externally sourced, are business tools that are to be used responsibly and for business purposes only.

Employees must be mindful of the potential for cybersecurity threats associated with their use of various technology tools and ensure heightened cybersecurity awareness. Employees should also remain vigilant regarding cyber threats that utilize artificial intelligence to automate, accelerate, or enhance a cybersecurity attack. Employees must take all required cybersecurity trainings provided by the Company and timely report cybersecurity threats or incidents in accordance with Guideline **MT 027**. Improper use of technology tools may have legal or security implications for the Company and for employees personally.

The content of email messages, Internet postings (including on social media), as well as the data we access over the Internet, must always be appropriate. Employees also may need to use their personal devices, such as mobile phones, to perform Company work from time to time, and Company policies may, in accordance with applicable laws, apply to use of these personal devices, as appropriate. METTLER TOLEDO reserves the right to monitor use of these systems or technologies at any time. More details can be found in Guideline **MT 055**.



Political and Charitable Contributions

We are supportive of individuals who volunteer and give back to their communities. Unless it is a Company-sponsored activity, such activities should not interfere with your work for METTLER TOLEDO or give the impression that such activity is performed on behalf of or sponsored by METTLER TOLEDO. Charitable contributions may never be used to illegally influence a business decision on behalf of METTLER TOLEDO.

METTLER TOLEDO does not participate in or contribute to political campaigns, individuals, or groups, and does not take positions in public policy debates. Employees may engage in political activities on their own time as private citizens but may not do so as a representative of METTLER TOLEDO. Employees should not feel pressure from the Company or their colleagues to contribute to, or perform tasks in support of, a political campaign.

Gifts and Entertainment

We are committed to a high standard of ethical conduct and choose to avoid even the appearance of impropriety in the conduct of our affairs. Accordingly, we may not make gifts of cash on the Company's behalf.

We may give or accept noncash gifts, entertainment, meals, and travel only infrequently, and only if of moderate value and in furtherance of a definite and legitimate business purpose. More details can be found in Guideline **MT 013**.

Antibribery

We conduct our business fairly, relying on the merits of our products, services, and employees. It is not appropriate, and may be illegal, to try and influence a customer or supplier to make a business decision in our favor by offering a payment or gift. Even if not illegal, such payments may create the appearance of impropriety and damage the Company's reputation.

No employee or representative of METTLER TOLEDO (including our business partners) may, directly or indirectly (e.g., through a third party), offer or provide a bribe to any person regardless of the amount. If there is any uncertainty, you should consult with Legal/Compliance. More details can be found in Guideline **MT 013**.

International Trade Considerations

We must comply with all relevant international trade laws. These laws include restrictions on exports of certain products, software, and technology to certain countries, individuals, and companies. What laws are applicable is not always self-evident: the rules are complex and highly fact-specific. For specific questions, employees should contact their supervisor or Global Trade Compliance. More details can be found in Guideline **MT 005**.

Reporting Violations, Accounting and Auditing Concerns

Employees must report suspected violations of laws, rules, regulations, our Code of Conduct, or the MT Guidelines to their supervisor, General Manager, Legal/Compliance, or the Head of Internal Audit. Making a report that is knowingly false or untrue is a violation of our Code of Conduct and may result in termination of employment.

Retaliation for reports made in good faith is strictly prohibited. Retaliation will result in disciplinary action, up to and including termination of employment.

Employees must cooperate fully in any investigation and keep their knowledge and participation confidential (in accordance with applicable laws) to help safeguard the integrity of the investigation.

Employees must submit complaints regarding accounting, internal accounting controls, or auditing matters, as well as concerns generally regarding questionable accounting or auditing matters. More details can be found in Guideline **MT 027**.

All submissions may be made confidentially and/or anonymously using the reporting channels described below. Employees should be aware that anonymous reports may be more difficult to investigate. The Company will strive to maintain confidentiality and may need to disclose certain information associated with a report that is necessary to investigate the matter or facilitate resolution.

- (a) Call +1 (800) 916 3542
(or the additional international phone numbers listed at [Reporting Hotline](#));
- (b) submit a webform at <https://mettlertoledo.navexone.com/intake>; or
- (c) contact the Board of Directors or Internal Audit, as listed below.

Lead Director
Mettler-Toledo International Inc.
1900 Polaris Parkway
Columbus, OH 43240
USA
Email: LeadDirector@mt.com

Head of Internal Audit
Mettler-Toledo International Inc.
1900 Polaris Parkway
Columbus, OH 43240
USA
Email: Ombudsman@mt.com

Waivers of Code of Conduct

Any waiver of our Code of Conduct for executive officers or directors of METTLER TOLEDO International Inc. may only be made by the Board of Directors or a committee of the Board of Directors and must be promptly disclosed by the Company to its shareholders.

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