

A large purple rectangular sign with white 3D lettering for 'Insulet' and '100 NAGOG PARK' is mounted on a grey stone wall. In the foreground, there is a lush garden bed filled with red and white flowers. The background shows green trees and a building under an overcast sky.

# Insulet

100 NAGOG PARK

## Code of **Business Conduct & Ethics**

**Insulet**  
maker of Omnipod

# Table of Contents

## **3 Message from Our President and CEO**

### **4 Introduction**

- 5 Our Responsibilities
- 5 Employees
- 5 Managers and Supervisors
- 6 Ethical Decision Making
- 6 Speaking Up and Reporting Concerns
- 6 No Retaliation

### **7 Our People**

- 8 Mutual Respect
- 8 Privacy and Protection of Personal Information
- 8 Work Environment and Culture
- 9 Harassment and Discrimination

### **10 Our Company and Shareholders**

- 11 Conflicts of Interests
- 12 Corporate Opportunities
- 12 Safeguarding Company Information and Assets
- 12 Use of Company Assets
- 13 Confidential Business Information
- 13 Responsible Use of Artificial Intelligence
- 14 Insider Trading

## **15 Our Customers, Business Partners and Distributors**

- 16 Bribery and Corruption
- 16 Gifts and Entertainment
- 17 What We Expect out of Our Business Partners
- 17 Sales, Marketing, and Communications Practices
- 17 Antitrust/Competition Laws
- 17 Competitive Practices

### **18 Conclusion and Resources**

- 19 Compliance and Ethics at Insulet
- 19 How to Reach Us



# A Message From Our President and Chief Executive Officer



To Team Insulet,

For more than a quarter century, our Company has been guided by a belief in doing the right thing. As we grow and build on our strong legacy of innovation, we remain unwavering in our commitment to ethics and integrity. At Insulet, we maintain the highest ethical standards in all that we do, guided by the foundational principles of quality, integrity, and our mission to improve the lives of people with diabetes.

Our commitment to transparency, accountability, and ethical business practices fosters trust and provides our greatest competitive advantage. We ask our employees, distributors, healthcare professionals, customers, and all other stakeholders to join us in this pursuit.

Implementing Code of Business Conduct and Ethics principles is often straightforward; however, we know that decision-making isn't always simple. Occasionally, we find ourselves facing challenging situations, especially in today's dynamic and complex business environment. During these moments, I find the Code of Business Conduct & Ethics especially valuable. It provides a powerful approach on how to navigate situations where we must deal with ambiguity and gray zones and take the time to make the right decision.

Insulet's continued success depends on all employees around the world, at all levels and in all markets, doing the right thing for the customers we serve. If you see something that isn't right, including anyone acting irresponsibly on behalf of the Company, speak up and let us know. Thank you for consistently upholding the highest standards of ethics and integrity.

**Ashley McEvoy**

President & CEO

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# Introduction

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Insulet is an innovative medical device company focused on improving the lives of people with diabetes and other conditions through its proprietary Omnipod® platform. Ethics, integrity, and compliance are values embedded in our culture, and those values shape our mission to improve the lives of people with diabetes. This Code of Business Conduct and Ethics (“Code”) clarifies what the Company expects of you, and what our customers and other stakeholders expect of us. It is not an exhaustive list of every policy you may need to know in your role, but it is a valuable roadmap.



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## Our Responsibilities

At Insulet, integrity is the foundation of everything we do. Our Code serves as a guiding framework for our employees and partners, ensuring that we conduct business with the highest ethical standards. By adhering to this Code, we stay true to our core values and principles.

For over 25 years, we have fostered a culture built on honesty, integrity, and accountability—principles that have propelled our growth and success. Compliance with all applicable laws and regulations is not just an expectation, but a fundamental requirement for everyone subject to this Code. This ethical culture remains one of our strongest competitive advantages, and our Code plays a crucial role in preserving and strengthening it.

Beyond guiding ethical conduct, our Code helps protect our brand and our stakeholders. It focuses attention on areas of ethical risk, offers guidance on recognizing and addressing ethical challenges, and provides mechanisms for reporting misconduct—without fear of retaliation.

Together, by embracing this Code, we reinforce our commitment to ethical excellence and ensure that our Company continues to thrive.

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## Employees

All employees are expected to adhere to the Code in all business interactions. As an employee, you have a responsibility to:

**Read, understand and comply with the Code:** complete all required trainings and certifications on time; follow all Insulet policies and applicable laws.

**Demonstrate sound judgment:** when uncertain, seek guidance from your Manager, Human Resources, Compliance, or Legal.

**Cooperate fully** with Company-authorized investigations.

**Speak up and promptly report** any known or suspected violations of the Code, or any other Insulet policies, through the [Company's Compliance and Ethics Hotline](#).

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## Managers and Supervisors

Managers and supervisors have additional responsibilities and play an important role in upholding Insulet's ethical culture. They set the tone throughout the organization. If you are a leader, you have the additional responsibility to:

**Strengthen our ethical culture** through transparency and honesty in all business matters.

**Talk with employees about ethics and compliance** and foster a work environment that encourages colleagues to raise ethical concerns without fear of retaliation.

**Encourage open and ongoing communication** with your team.

**Respond to employee concerns** with empathy and respect, creating a safe and comfortable environment for open dialogue.



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## Ethical Decision Making

Insulet's Code is not intended to address all laws, rules, policies, or circumstances involving ethical conduct. We must all use good judgment in determining appropriate conduct. It's unrealistic to expect everyone to know everything. If you find yourself in a situation where you are unsure of the ethical implications of an action, use these simple questions as a moral compass:

- Is it consistent with the Code?
- Is it ethical?
- Am I being fair and honest?
- Are my actions legal?
- Is this the right thing to do?
- Will it reflect well on me and the Company?
- Would I want to read about it in the newspaper or on the internet?

**If the answer is "No" to any of these questions, DO NOT do it!**

If you still need guidance, talk to your Manager, Human Resources, Compliance, or Legal.

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## Speaking Up and Reporting Concerns

Avoiding violations of the Code is not just about obeying the law. We believe working with integrity and treating each other with respect fosters a culture that encourages innovation and helps us all to succeed.

We all have an obligation to report any activity that is suspected to be unlawful, fraudulent, or unethical as soon as possible.

Here is what you can expect from Insulet:

- We take all reports of potential violations seriously
- We promptly investigate all reports
- We treat all reports as confidential to the extent possible
- We make every effort to protect the anonymity of individuals who report potential violations in good faith
- We strictly prohibit retaliation against anyone who reports a concern in good faith

Nothing in this Code limits your right to voluntarily report potential legal or regulatory violations to government agencies or to make disclosures protected under the applicable whistleblower laws. This includes reporting to the U.S. Department of Justice, the Securities and Exchange Commission, or relevant law enforcement or regulatory bodies in other countries. You do not need prior approval from Insulet to make such reports, nor are you required to notify Insulet. However, if you feel comfortable doing so, we encourage you to report concerns internally so that we can address them promptly and appropriately.

Given the complexity of international operations, employees must adhere to local laws and regulatory requirements specific to their location. In situations where there is a conflict between the local laws and our Company policy, the more stringent requirements generally apply.

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## No Retaliation

Our Company prohibits and will not tolerate retaliation against anyone who, in good faith, reports an actual or apparent violation of any law, rule, regulation, or provision of this Code or any of the other Insulet policies. In this case, "good faith" means providing all the information available and believing it to be true. The [Misconduct Reporting Standard Operating Procedure](#) requires that any unethical or illegal conduct be reported immediately.

Retaliation or reprisals are considered a violation of this Code. If you believe you have suffered any form of retaliation, please do not hesitate to report the matter to your manager, or you may also use the [Compliance and Ethics Hotline Portal](#).

# Our People

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We succeed when our employees feel included, empowered, and have a true sense of belonging. We fulfill our values by fostering a respectful and inclusive culture where everyone feels comfortable being themselves at work every day.

We are committed to complying with all applicable employment laws worldwide. We strive to create a culture of fairness and respect, including in our hiring and advancement practices.

Respecting people also means that we share responsibility for maintaining a safe and respectful work atmosphere that is free of abusive or unprofessional conduct.





## Mutual Respect

We must respect everyone as individuals and treat them with dignity. We embrace individual differences in a spirit of inclusiveness that welcomes all people and seeks to provide them with the opportunity to unleash their potential.

By treating each other with respect, dignity, courtesy, and fairness, we can continue to succeed through effective teamwork and collaboration.

## Privacy and Protection of Personal Information

Our respect for people also means we respect the privacy of our employees, contractors, vendors, customers, and partners. This is especially important with regard to personal information, which may include names, passwords, national identification numbers, home addresses, telephone numbers, bank account information, health-related information, and other data.

Our [HIPPA Privacy Notice](#) and [Privacy Policy](#) describe the types of personal information we collect; how we use the information; with whom we share it; and the rights of, and choices available to, individuals regarding our use of their information.

We are committed to collecting, using, sharing, and protecting personal information responsibly and in compliance with applicable data privacy and security laws. Employees are required to comply with all applicable laws and Company policies on data privacy and security.

## Work Environment and Culture

As a global organization with a presence in many countries, we are united by a clear mission: to improve the lives of people with diabetes. To bring our mission to life, we are also committed to creating an exceptional employee experience. We have identified five critical behaviors—Energize, Speak Up!, Collaborate, Innovate, and Deliver—that guide our daily actions and decisions. These are our Ways of Working (WoW).

These behaviors shape how we show up every day, guiding our actions and decisions. We ask all employees to embrace the WoW as we continue building a culture that sets Insulet apart.

**One Team. One Plan. One Culture.**



## Harassment and Discrimination

Everyone has the right to a work environment that is free from harassment of any type. As part of your role with Insulet, you can expect—and are expected to help maintain—a work environment that is free from any form of harassment, bullying, hostility, and intimidation. This means that we do not tolerate any offensive or unwelcome physical, written, or verbal conduct in the office or electronically through technology, such as virtual meeting platforms, text, email, or social media. We will not tolerate conduct—whether verbal, nonverbal, or physical—by anyone associated with our business (including suppliers and customers) that harasses or creates an intimidating, offensive, abusive, or hostile work environment, including workplace violence or sexual harassment. Our employees and managers are required to comply with all anti-harassment laws in the locations where they work.

Sexual harassment occurs whenever unwelcome conduct based on sex (including sexual orientation and transgender status) affects a person's job. Such conduct includes any unwelcome sexual advances; requests for sexual favors; and other verbal or physical conduct of a sexual nature that results in an intimidating, hostile, or offensive working environment.

**“Unwelcome conduct”** may be conduct that is unwanted, uninvited, or uninitiated.

Conduct that may be acceptable for one person may be unwelcome for another (such as a joke, hug, or picture). The determination about potential harassment does not depend on the intent of the alleged harasser. Rather, it depends on the person receiving or witnessing the conduct and considering it to be unwelcome.

### Example 1

Tariq often greets female employees with a hug. Tariq is friendly to male co-workers too, but generally just gives them a slap on the back. What Tariq doesn't realize is that while some co-workers may tolerate his behavior, others feel uncomfortable with his actions. Tariq needs to understand that while he may have good intentions, his conduct could be the basis for a sexual harassment complaint because it is unwelcome to at least one co-worker.

### Example 2

If a manager promises a pay raise to an employee in return for sexual favors, this constitutes harassment under the law and also violates Insulet policy. Even if the conduct occurred outside of work, it is related to work and is severe enough to create a hostile work environment or constitute quid pro quo sexual harassment.

**If you experience any form of harassment or violence** directed at you, or observe this type of behavior being directed towards another employee, it is imperative that you report the incident. You have multiple avenues for reporting, including speaking to your manager, using the Compliance and Ethics Hotline Portal, or contacting Human Resources. Each of these options provides a safe and accessible way for you to seek support, especially in sensitive situations.

# Our **Company and Shareholders**



## Conflicts of Interest

We have the responsibility to make business decisions that are in the best interest of our Company.

“**Conflicts of interest**” may arise during activity in which personal interests could compromise, or appear to compromise, our ability to make objective decisions and act in the best interest of our Company and shareholders.

If you have an actual or potential conflict of interest, you must promptly disclose it using our [Conflict of Interest Disclosure Tool](#). In situations where you are uncertain whether a conflict exists, we encourage you to contact the Legal or Compliance department for guidance.

This requirement also includes transactions, relationships, or situations involving another person that may give rise to an actual or potential conflict of interest. Notification and disclosure are crucial for resolution and help us maintain our ethical culture. Conflict of interest issues can be resolved only upon review of the particular circumstances in the context of our activities within Insulet.

### Examples of potential conflicts of interest

The list below is a sample of transactions, relationships, and situations that might cause an actual or apparent conflict of interest.

#### Example 1

Kaysha, an IT professional, starts a company that provides IT consulting services to Insulet customers while he is employed by Insulet.

#### Example 2

Sara, a staffing specialist, works part-time in the evenings and weekends for a competitor of Insulet.

#### Example 3

Mohammed, a manager and decision maker, accepts a golf trip from a potential vendor and then selects the vendor to do work for Insulet.

#### Example 4

Jackson, who is a member of a Human Resources team, fails to disclose that his brother-in-law is a candidate for a position for which Jackson is the lead recruiter.

**For each of these types of situations, it is essential that you disclose the conflict or potential conflict.**

## Corporate Opportunities

We are expected to carry out our responsibilities in a way that supports and advances the Company's legitimate business interests. We must not use Company property, information, or our position at Insulet to pursue personal opportunities or gain.

### Example

Luca, a Business Development VP at Insulet, learns through his company role that a key supplier is planning to sell a manufacturing facility that produces specialized components used in Insulet's products. This facility has unique capabilities that are difficult to replicate and would be valuable to Insulet's production process. Instead of presenting this acquisition opportunity to Insulet's leadership team, Luca creates his own investment company and approaches the supplier directly. He uses his knowledge of Insulet's needs and pricing structure to negotiate favorable terms for himself.

Luca then purchases the facility and increases the prices when selling the components back to Insulet, personally profiting from an opportunity that should have been presented to the Company first.

## Safeguarding Company Information and Assets

We have a responsibility to safeguard Insulet's assets as if they were our own. Insulet's assets are more than just money, property, and equipment. They include financial data, ideas, business plans, technologies, customer lists, personal information about employees, and other proprietary information.

The theft, misappropriation, or unauthorized use of any of these assets is a serious matter and will be treated as such.



## Use of Company Assets

We must act in a manner that preserves our Company's physical property, supplies, and equipment. Personal use of these assets is permitted only with prior approval. They must never be used for personal gain or purposes unrelated to our Company. Our [Insulet Information Systems Acceptable Use Policy](#) provides additional details around this.

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## Confidential Business Information

Confidential business information about our business strategies and operations is a valuable Company asset.

**“Confidential business information”** includes pricing and cost data, customer lists, potential acquisitions, business processes and procedures, financial data, trade secrets and know-how, personnel-related information, marketing and sales strategies and plans, supplier lists, and other information and developments that have not been released publicly.

All Company information must be used solely for the benefit of our Company and never for personal gain. We share this responsibility even after our employment and business relationships with Insulet end, subject to applicable laws.

In addition, nothing in this Code prohibits you from voluntarily reporting possible violations of law or regulations to a governmental agency or making other disclosures that are protected under “whistleblower” statutes or regulations. See our [Speak Up](#) page for additional information and guidance.



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## Responsible Use of Artificial Intelligence

At Insulet, we are committed to the responsible use of Artificial Intelligence (AI) and [Generative AI](#) to enhance our business operations and improve our customers' experience. By augmenting human intelligence with artificial intelligence, we aim to develop innovative products that improve the lives of people with diabetes and serve our customers' needs. We also foster the use of AI by our employees, agents, and contractors to enhance productivity and create a supportive work environment. Our [AI Council](#) is dedicated to high standards of AI deployment, adhering to applicable laws and regulations. We prioritize good governance and responsible risk management to harness the benefits of AI while maintaining ethical standards and long-term efficiency.

## Insider Trading

Your work at Insulet may give you access to material non-public information.

**“Material non-public information”** includes any information that would impact a reasonable investor’s decision to trade a company’s securities and that is not generally available to the investing public.

It is illegal to trade in Insulet securities, or the securities of any other company, based on material non-public information. Trading in this situation is called *insider trading*. Insider trading laws also prohibit you from passing on such information to others who might then trade in Company stock.

Any information, whether it is positive or negative, that could be expected to affect a company’s stock price should be considered material. Examples of possible material information include but are not limited to: corporate earnings or earnings projections; sales results; strategic plans; significant cybersecurity incidents; important personnel changes; marketing initiatives; mergers or acquisitions; major litigation; significant borrowings or financings; or other significant developments. Anyone with access to such information must keep it confidential. You may not discuss confidential information with anyone outside our Company, including non-Insulet business contacts, family members, or friends.

Please refer to the [Insulet Insider Trading Policy](#). We are expected to fully comply with this policy. If you want to buy or sell our stock, but are not sure about these requirements, you should contact our Legal Department.



Our  
**Customers,  
Business  
Partners, and  
Distributors**



## Bribery and Corruption

Bribery occurs when things of value (e.g., cash, cash equivalents, or gifts) are provided directly or indirectly to individuals, including government officials, business partners, customers, or prospective customers to influence a discretionary decision. We are responsible for complying with all applicable anti-bribery and anti-corruption laws in the countries and territories in which we do business. A few well-known statutes include the Foreign Corrupt Practices Act in the U.S., the U.K. Bribery Act, and the Sapin II Act in France. These anti-corruption rules also apply to anyone who works on Insulet's behalf.

A “**facilitating payment**” is a small sum of money paid to a government employee for more quickly performing a routine, non-discretionary duty that would otherwise be delayed, such as obtaining a passport or phone service.

Facilitating payments are illegal under the laws of most countries around the world. In keeping with our policy of compliance with all applicable laws, we do not permit facilitating payments. If you receive a request for a facilitating payment or have questions, please contact the Legal Department.

## Gifts and Entertainment

We must always conduct our business with high standards to maintain our reputation for fair and honest dealings. We recognize that providing or receiving gifts, entertainment, or travel benefits can be a legitimate part of doing business, especially in certain parts of the world. To mitigate the risk of misconduct associated with offering or receiving such benefits, you must adhere to Company policy at all times.

Our [Gifts and Entertainment Policy](#) provides general rules that our employees should follow when receiving gifts or entertainment from actual or prospective business partners including country specific and global limits for meals and gifts.

Gifts to healthcare professionals, healthcare organizations, and/or government officials are generally prohibited. For further information, please see Insulet's [Sales and Marketing Code of Ethics](#); Insulet's [Code of Practice Regulating Interactions with HCPs, HCOs \(Europe and Middle East\)](#); and also Insulet's [Foreign Corrupt Practices Act and Bribery Act Policy](#).

Avoid any actions that create a perception that favorable treatment was sought, received, or given in exchange for personal or business benefits.



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## What We Expect out of Our Business Partners and Distributors

We can be held legally responsible for the conduct of a business partner when it occurs in the course of their work for the Company. Accordingly, it is essential that we do business with business partners who demonstrate high standards of ethical business conduct.

As a multinational corporation with a growing global footprint, Insulet's geographic expansion strategy often relies on distributors to assist in getting our products to certain markets.

We must be mindful of the fact that Insulet could be liable for the activities of its Distributors who interact with Government Officials or Healthcare Providers in connection with the sale, promotion, or other activities involving Insulet's products. We, therefore, have a role to play in driving best practices in key areas, such as anti-bribery and corruption.

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## Sales, Marketing, and Communication Practices

We take pride in the quality of our products and conducting our business with integrity, competing fairly and ethically in every market we serve.

We will commit to present only accurate and truthful information about our products in presentations, discussions with customers, our advertising, promotional literature, and public announcements. When asked to compare ourselves to the competition, we will present all information fairly.

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## Antitrust/Competition Laws

Insulet is successful in competitive and open markets. Our success is built on excellence in all areas of our business. The U.S., the European Union, the Organization for Economic Cooperation

and Development, and other countries and groups of countries have adopted antitrust and competition laws intended to preserve competition and promote open markets. We intend to fully comply with these laws and regulations which prohibit agreements that interfere with fair competition. Our Company will not tolerate any conduct that violates these requirements.

It is not permitted for anyone in our Company to direct, participate in, approve, or tolerate any violation of antitrust or competition laws. Managers are responsible for the conduct of their teams. Because the laws are not identical in every country, it is important that you understand the antitrust/competition laws that are relevant to your market.

Prevention is key, so if you have questions about applying the antitrust or competition laws to past, present, or future conduct, consult with our Company's Legal Department.

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## Competitive Practices

We compete openly and fairly. We have a responsibility and a right to obtain information about other business organizations, including our competitors, through appropriate ethical and legal means. Such information may include analysts' reports, nonproprietary marketing materials, advertisements, public journals and magazine articles, and other published and spoken information.

We will not obtain such information through unethical and illegal means, such as industrial espionage, wiretapping, or by misrepresenting our identity. We will not accept or read any competitors' documents known to us to have been improperly obtained.

Insulet respects all legal obligations you may have with a prior employer, including a confidentiality agreement and/or an agreement that prohibits soliciting former colleagues or customers. If you are subject to such an agreement, you must disclose it to your manager, or to Human Resources, so that Insulet can ensure compliance with its terms.

# Conclusion and Resources



## Compliance and Ethics at Insulet

We believe that integrity is the foundation of our culture and critical to our long-term success. We work to inspire and enable Insulet employees to act with integrity in all we do. We are committed to complying with the laws and regulations that apply to our business operations. For us, compliance is more than just following rules. It includes considering the broader implications of the actions we take, and adapting to new challenges and situations, always guided by our values. Our Compliance team is here to help you. Please contact us if you have questions about the topics covered in our Code.

### Remember: Speak Up

Insulet Compliance and Ethics Hotline Portal is operated by an independent third party, and is available 24 hours a day, seven days a week with operators available in multiple languages. Anyone within or outside the Company can use the hotline to raise an anonymous concern.

## How to Reach Us

### Compliance and Ethics Hotline Portal

1-855-409-9992

(call from United States)

Click [here](#) for information on how to call from outside of the U.S.



### Compliance Department

1-978-600-7000

[Compliance@insulet.com](mailto:Compliance@insulet.com)

### Legal Department

1-978-600-7000

[Legal@insulet.com](mailto:Legal@insulet.com)

[Global Compliance Page](#)

### Human Resources Department

1-978-600-7000

[ER@insulet.com](mailto:ER@insulet.com)

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[Global Policy Hub](#)