



Together, **We Are** Brooks.

**BROOKS CODE OF CONDUCT**

## A MESSAGE FROM OUR CEO



We are proud to be the partner of choice for leaders within the semiconductor and lab automation industries. Our partners select us because we solve problems, collaborate closely, and focus on innovation. In short, they choose us because of what we do. However, they stay with us because of who **WE ARE**: a team of experts optimizing value while upholding our standards of integrity.

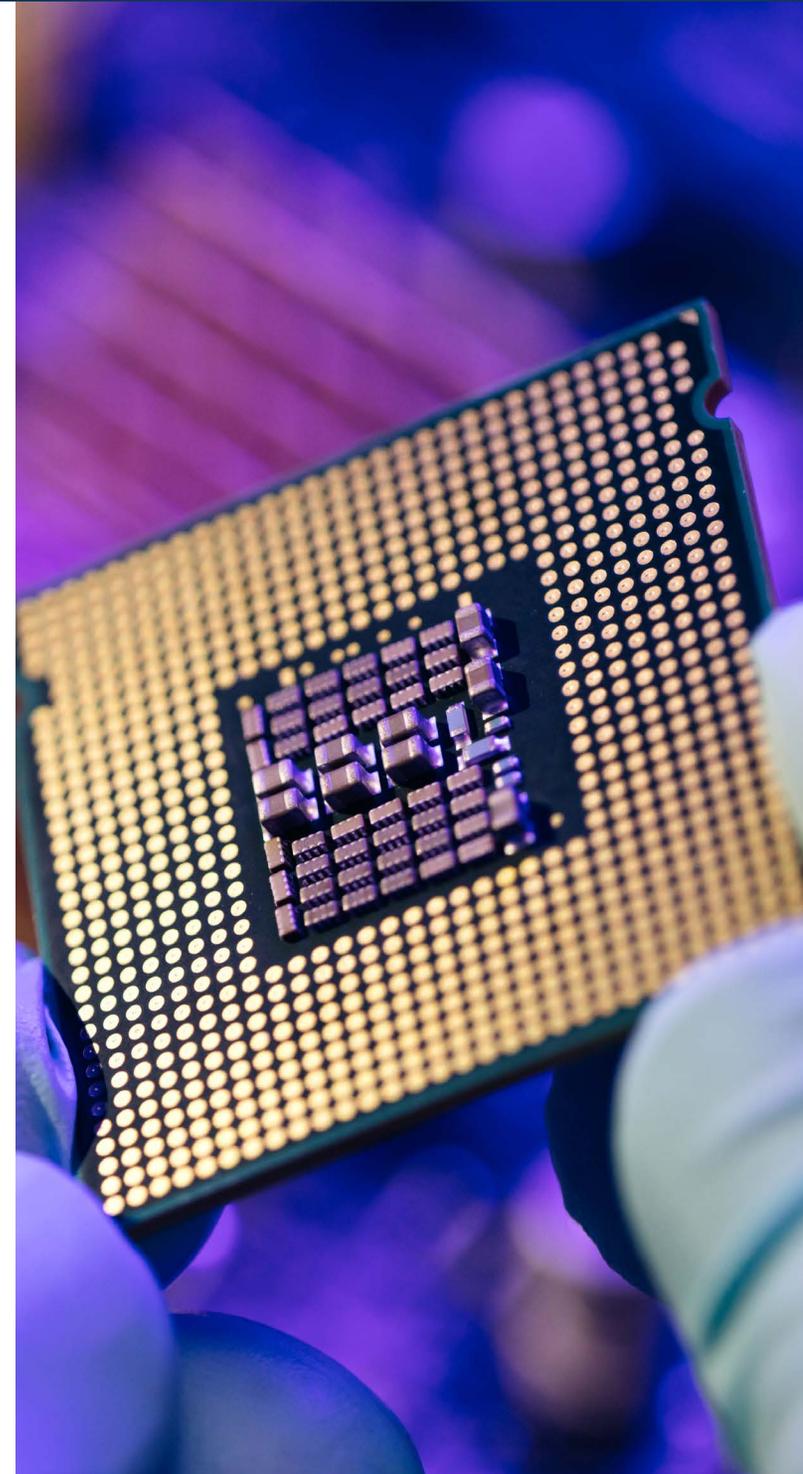
Our standards are outlined, in our Code of Conduct (“Code”). Our Code includes the foundational principles we need to understand and practice to continue to build an enriched organizational culture. Our Core Values are at the heart of our Code, which defines who we are as a team.

Together, we are **World-Class** in our customer focus and continuous improvement. We are **Empowered** to create value and innovate to overcome challenges. We hold ourselves **Accountable** and are **Respectful** to our customers and our peers, continually reaffirming our commitment to Diversity, Equity, and Inclusion for a more culturally competent organization. We remain **Engaged** always, meeting our commitments with passion, integrity, and quality.

Together, we strive to create a more valued workplace culture through our Environmental, Social, and Governance (ESG) program, which incorporates positive resources. The Women’s EDGE group, mental health and wellness initiatives, and charitable giving to promote a healthier, more sustainable community are a few of our existing programs, and we are continuing to invest in additional programs.

We wouldn’t be able to accomplish such success without your support. Thank you for joining us in bettering Brooks by upholding our Code and contributing to our ESG program. Doing so will help us all remain true to who **WE ARE** and, **Together, We Are Brooks**.

David Jarzynka  
Chief Executive Officer



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# WE ARE

## Living Our Core Values Together

At Brooks, new ideas, innovations, and ways of thinking our future. Everything we accomplish is grounded in our Core Values, and we live together.

- Living Our Core Values
- Honoring Our Code
- Supporting the Responsible Business Alliance Code
- Leading by Action
- Using Our Voice



## LIVING OUR CORE VALUES

Our Core Values underpin how we meet our objectives, from who we hire to how we behave as a company and what we deliver to our customers.

Brooks' Core Values:

# WE ARE



### World Class

We have a relentless focus on being the best in class and the partner of choice by understanding the priorities of our customers and Brooks and committing to the value of continuous learning.



### Empowered

Each of us has the ability to create value, innovate, and continuously improve through collaboration and challenging barriers.



### Accountable

Each of us owns our commitments to our customers and each other with an unwavering focus on safety, integrity, and quality of delivery in everything we do.



### Respectful

We are respectful of one another, valuing Diversity, Equity, Inclusion, and honoring our commitments, knowing our greatest strength comes from the differences and unique perspectives that everyone brings.



### Engaged

We act with pride, passion, and focus to deliver valued results to our customers, employees, global communities, and investors.

## HONORING OUR CODE

Consider our Code an outline of the standards we uphold as a company. It summarizes applicable laws, regulations, and company policies while expanding on our Core Values. We honor our Code by letting it guide our day-to-day decisions as Brooks employees.

Our suppliers, vendors, consultants, and other third parties (“partners”), comply with the spirit of this Code and with our Supplier Code of Conduct. We have a duty to communicate our standards to partners clearly, and both codes convey what’s important to us.

Remember that although it’s a comprehensive resource, our Code does not cover every imaginable scenario we may face on the job. That’s why we use good judgment and [ask for help](#) if we don’t know what to do.

At Brooks, we are strongly committed to our Code, and breaches of the Code may result in serious ramifications for employees and for Brooks. If a law or regulation is also broken, it could lead to legal proceedings, fines, or other penalties as well.

Let’s act ethically and honor our Code to protect ourselves and Brooks.



## SUPPORTING THE RESPONSIBLE BUSINESS ALLIANCE CODE

In addition to this employee Code, know that we support the Responsible Business Alliance (“RBA”), and we’re dedicated to complying with the RBA Code of Conduct (“RBA Code”). We require our partners to do the same.

The RBA Code is a set of social, environmental, and ethical industry standards for the electronics and related industries to ensure that:

- » Working conditions are safe.
- » Workers are treated with respect and dignity.
- » Business operations are environmentally responsible and conducted ethically.

Our employee Code contains information on many of the same topics covered by the RBA Code, including:

- » Labor
- » Health and safety
- » Environment
- » Ethics (including responsible minerals sourcing)

Everything in our employee Code is meant to align with, and be supplemented by, the RBA Code, and we always follow the stricter standard.

In addition to the aforementioned topics, the RBA Code contains guidance on management systems. This guidance focuses more on Brooks’ responsibilities to employees. With it, we have adopted a management system to help ensure:

- » Compliance with all applicable laws, regulations, and customer requirements.
- » Conformance with the RBA Code itself.
- » Identification and mitigation of operational risks related to the RBA Code.
- » Continuous improvement.

To learn more about the RBA Code and how it applies to our roles, contact the [Legal Department](#) for guidance. While the RBA Code is specifically mentioned, our employee Code is intended to be consistent with all applicable global codes, including those of our customers and partners.



### A CLOSER LOOK

[RBA Code](#)



## LEADING BY ACTION

Once we've familiarized ourselves with the requirements of our employee Code and the RBA Code, it's time to implement that knowledge.

### Take Responsibility

As employees, we:

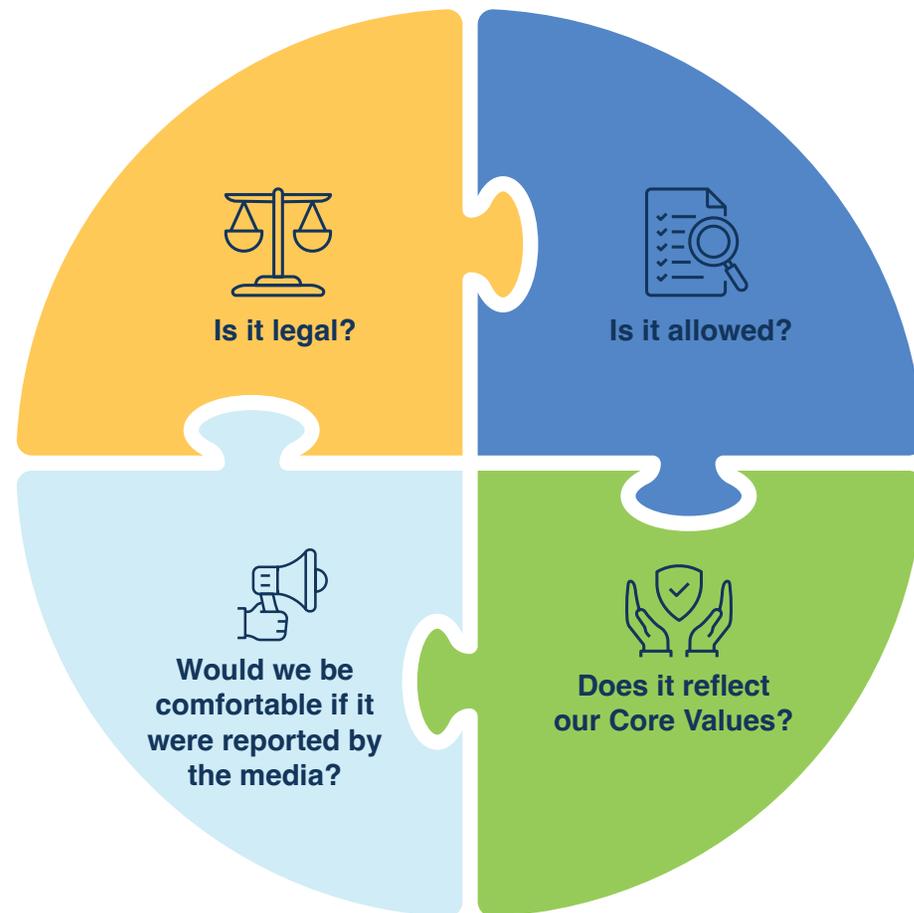
- » Live our Core Values.
- » Honor our Code, the RBA Code, our policies, and the law.
- » Commit to using good judgment and common sense.
- » Speak up if suspected wrongdoing has occurred.
- » Cooperate with the investigations and audits.
- » Encourage partners to review our Code and live our Core Values.
- » Ask questions if we don't know what to do or need guidance.

Managers have additional responsibilities and should always:

- » Set an ethical tone from the top.
- » Provide appropriate training for all employees.
- » Keep an open-door policy, and be prepared to answer employee questions about the Code.
- » Guide team members to the correct resource when they need additional guidance.
- » Report potential misconduct and escalate reports when necessary.
- » Prevent retaliation against anyone who reports a concern in good faith or participates in an investigation or audit.

### Make Ethical Decisions

Whenever we are considering whether an action would follow our Code, it helps to ask these questions:



If the answer is "yes" to all, it's probably OK to proceed. But if the answer is "no" or "I'm not sure" at any point, it's important that we stop and ask for guidance.

## USING OUR VOICE

We share a unified commitment to working with integrity, always. It's about more than following the Code. It's also about speaking up if we see, experience, or suspect wrongdoing. Even if we're unsure of whether misconduct has occurred, we speak up because it is the right thing to do.

### When should we speak up?

When we believe someone's behavior isn't in line with:

- » Our Core Values
- » Our Code
- » The RBA Code
- » Our policies or procedures
- » Applicable laws or regulations
- » Our general sense of what's right

### How do we speak up?

We contact:

- » Our manager
- » Another manager we trust
- » A member of the Human Resources organization
- » Legal Department
- » The hotline

Keep in mind, we may also provide information on a confidential basis using our [hotline](#). The hotline is staffed 24 hours a day by an independent, third-party service provider, and telephone assistance is available in multiple languages.

### What happens when we speak up?

Brooks will promptly conduct a thorough investigation. When everyone involved cooperates, we get the best results. That's why we work to preserve evidence, tell the truth, and respond swiftly to all questions and concerns.



### HOTLINE INFORMATION



Phone: [844-984-1747](tel:844-984-1747)



**International Hotline:** For a complete list of access codes, go to [Company Ethics Hotline](#).



Email: [ethics@brooks.com](mailto:ethics@brooks.com)

Those with accounting-related or financial reporting concerns who would also like to communicate directly with the Audit Committee or our Board of Directors, may call **978-262-7444**.

### What is Brooks' stance on retaliation?

We don't allow any form of retaliation (such as a demotion or firing) against those who cooperate with an investigation or speak up in good faith.

Good faith is when we raise concerns about something that we truly believe may not be in line with our Code, even if we're mistaken.

Know that when we speak up, in good faith, our honesty and courage will be protected. Let's use our voice to help ensure each one of us embodies our Core Values – because [together, we are Brooks](#).



# WE ARE World Class

**We have a relentless focus on being the best in class and the partner of choice by understanding the priorities of our customers and Brooks and committing to the value of continuous learning.**

- Valuing Our Customers
- Competing Fairly
- Marketing Honestly
- Offering World-Class Products
- Selecting Our Partners

## VALUING OUR CUSTOMERS

Prioritizing our customers has made us the global automation leader we are today. We take the time to learn what our customers want and adapt to their ever-evolving needs.

In doing so, we embrace innovation, challenge the status quo, and work tirelessly to advance science and technology in ways that enable a healthier and more connected world.

In short, giving our best to our customers brings out the best in us – which contributes to our lasting success.

### Focus on feedback.

Customer satisfaction is, and will always be, our top priority. When we learn about customers' wants and needs, we can better maximize those aspects of our offerings. When in a customer-facing role, let's make it our business to gain insight into what customers hope we keep, enhance, or improve upon. Then let's use this information to guide our continuous learning, contributions to the team, and improvements to our offerings.

### Work with integrity.

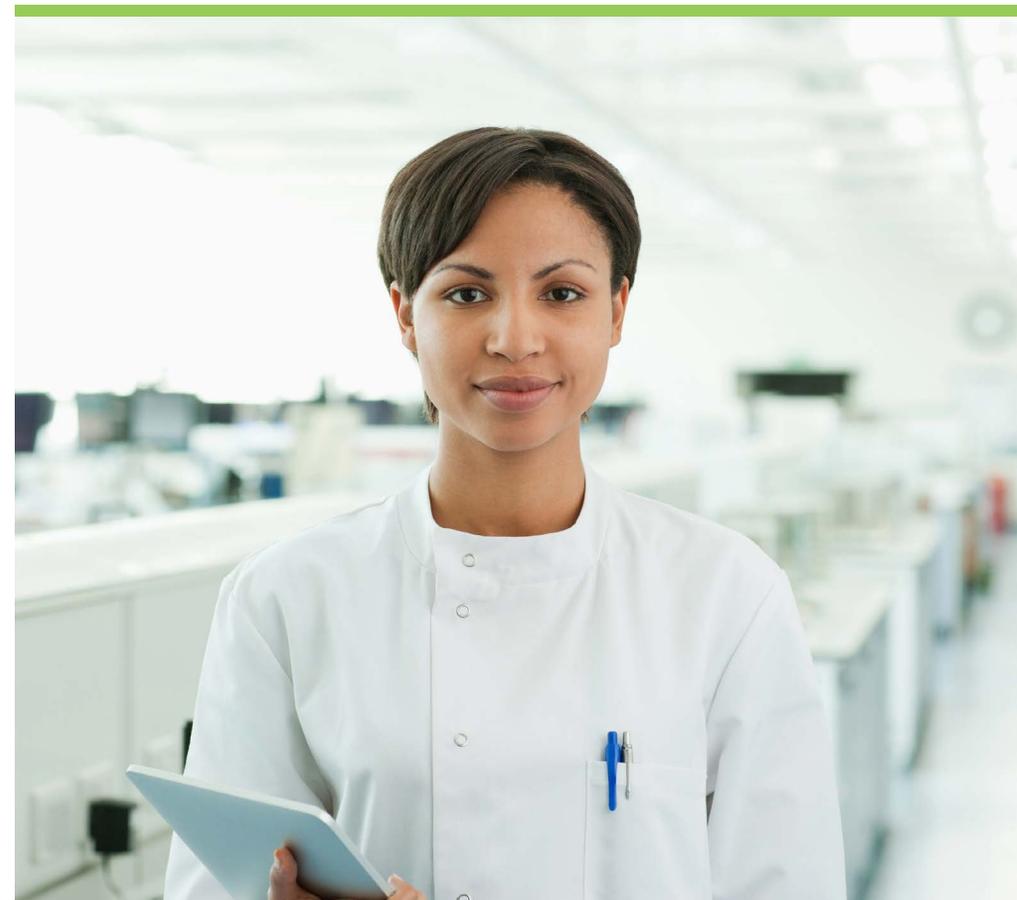
Customers are more likely to stay with brands that work in ways that align with their personal set of morals. What we do is important, but so is how we do it. At Brooks, we:

- » Promote integrity and the highest standards of ethical conduct.
- » Comply with all applicable laws, regulations, and policies.
- » Make decisions that reflect who we are and what we stand for.

### Remember, a positive experience matters.

In addition to providing the highest quality solutions and services, we provide positive experiences for our customers. We go beyond the transactional to build connections with everyone we interact with. Ways to do so include:

- » Actively listening and focusing on solutions.
- » Communicating in ways that are personal, impartial, and clear.
- » Taking note of frequent customer praises or concerns.



## COMPETING FAIRLY

Being best in class doesn't happen by bending the rules – but by continuously improving the quality of our offerings and working in ways we can all be proud of.

As a member of our team, work with the highest standards of ethics and avoid even the appearance of anything improper.

That way it's clear our success comes from our ideas, cutting-edge technologies, and passionate teams – nothing more, nothing less.

### Promote free competition.

Competition is good. When organizations compete for customers in ways that are free and fair, it leads to increased innovation, variety, and quality. We never enter into any agreements with competitors or partners that would restrict competition.

Specifically, we avoid agreements or even conversations about:

- » Pricing strategies that would violate the law or our policies
- » Divvying up customers, markets, or territories
- » Restricting production or output
- » Preventing others from entering the market
- » Refusing to deal with a competitor or third party
- » Rigging the outcome of a competitive bid

Instead, we focus on ethical competition by:

- » Remaining objective and fair
- » Documenting interactions with customers and other third parties
- » Seeking guidance from the [Legal Department](#) when entering arrangements with outside entities



## COMPETING FAIRLY

### Protect competitively sensitive information.

Information in our industry is key. However, we must be mindful about how we gather and share it.

When wanting to learn more about our competitors and their customers and partners, we use honest methods and document the public source we received our information from.

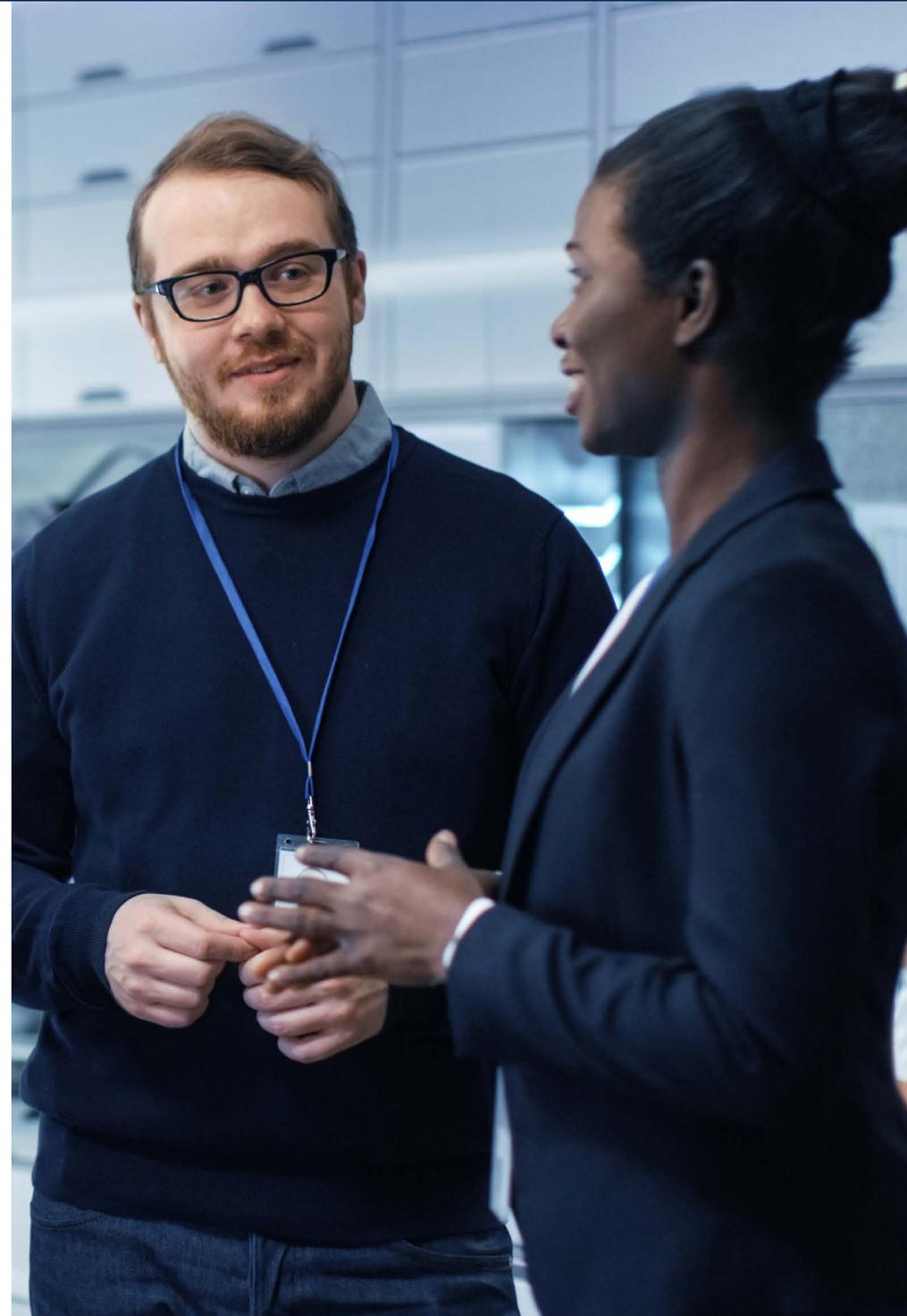
When sharing our competitively sensitive information, we get permission and put the appropriate safeguards in place. We also report any improper requests for information to the [Legal Department](#) immediately.



### LIVING OUR CORE VALUES TOGETHER

**You're at a trade show and have hit it off with one of our competitor's employees. Over lunch, you both talk about what you love about your jobs. Then your new friend asks about our pricing. Is this just business as usual?**

*No, not at all. Conversations about pricing and other topics that could restrict trade often violate our policies and the law. Tell them that you believe the discussion is inappropriate, end the conversation, and notify the Legal Department.*



## MARKETING HONESTLY

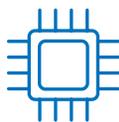
Honesty promotes trust, a fundamental building block of professional relationships, so it will always be our go-to marketing strategy. By being direct, clear, and truthful about our solutions, we set realistic expectations for those curious about our brand. When we meet (and surpass) those expectations, we provide a positive experience that keeps customers returning.

### Tell our story.

We offer amazing services and solutions, so there is never a need to deliberately mislead customers, overpromise, or use any other **bad marketing tactic**. Instead, we are passionate, but also sincere and transparent. It sparks the same in others.

**Bad marketing** tactics include:

- > *Fear mongering*
- > *Making false claims*
- > *Leaving out important facts*
- > *Exaggerating our abilities*
- > *Disparaging competitors*

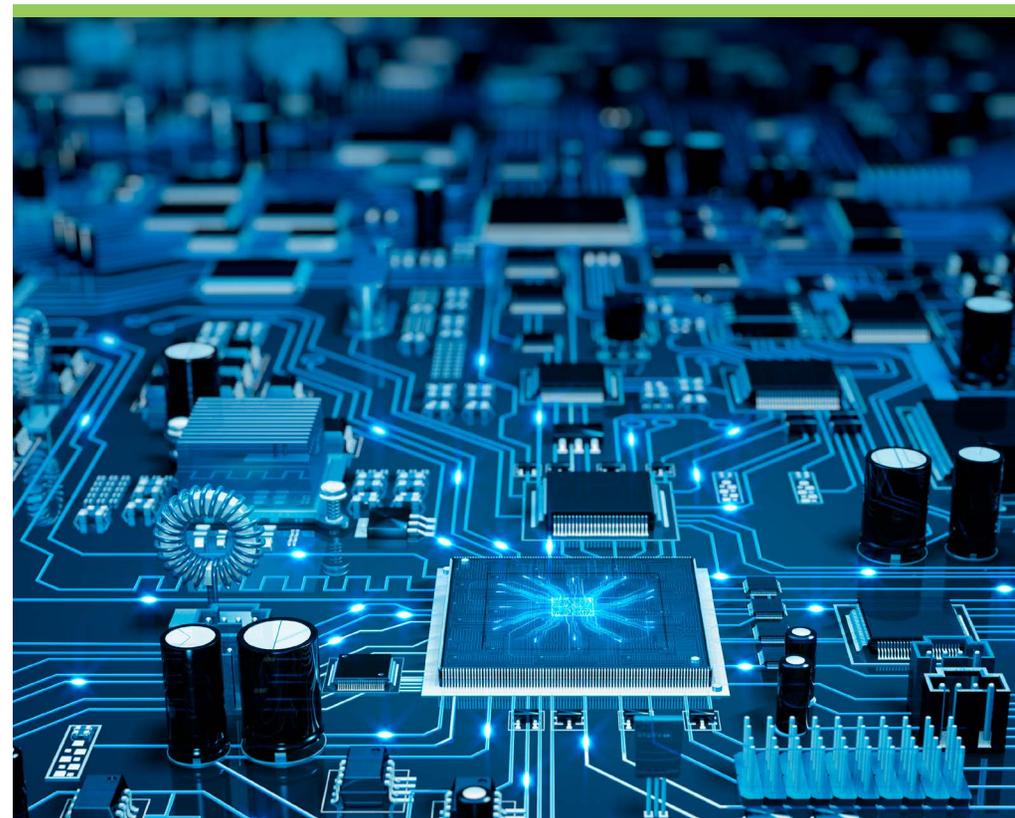


### Provide verified information.

We take pride in what we do and want to share our successes with the world. However, we must be prudent about what we share and when.

Before including information in an advertisement, we ensure all claims have been vetted and verified. Conducting appropriate studies, tests, and research are all examples of ways we can ensure we stand on what we say.

Also, if a competitor makes a claim about us that is not accurate, we notify the [Brooks Legal Department](#) to determine how to respond.



## OFFERING WORLD-CLASS PRODUCTS

At Brooks, the quality and safety of our offerings remain unmatched. We go beyond legal requirements and safety specifications, to consider customers' current and emerging needs as well as industry trends.

Our focus on solutions over transactions is what drives us forward. We then measure our success by our ongoing relationships with customers. Their loyalty is evidence of our world-class position in the market.

### Work as a team.

We succeed in continuously improving our performance and quality by empowering our colleagues, customers, and communities. As Brooks employees, we:

- » Focus on data-driven decision-making and rapid problem resolution.
- » Collaborate effectively and efficiently with colleagues, partners, and customers alike.
- » Comply with Brooks' processes and safety requirements as well as applicable laws, standards, and regulations.

### Take individual responsibility.

Offering world-class products is the responsibility of every Brooks employee. That's why we each:

- » Take accountability for every customer's satisfaction.
- » Personally ensure partners meet or exceed our requirements.
- » Continuously check and improve upon equipment and processes.
- » Complete all required trainings and certifications.
- » Report any safety issue or defect to your manager immediately.



### LIVING OUR CORE VALUES TOGETHER

**You realize that one of the product tests that we perform is repeated further down the production line, so you skip the first test to speed up delivery. Smart thinking?**

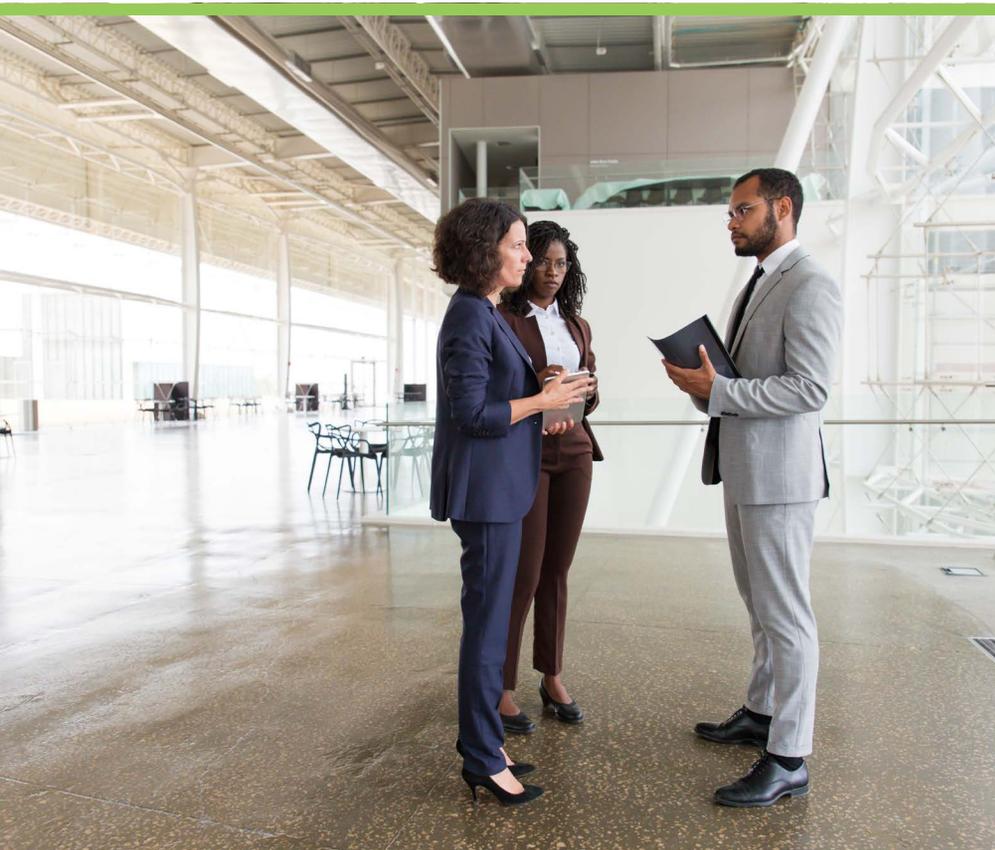
*Not at all. Skipping a required test is never OK. If you have ideas for speeding things up, share them. But until your ideas are approved, stick to the plan. Otherwise, you risk the safety of our customers.*



## SELECTING OUR PARTNERS

As we continue to expand our product portfolio and infrastructure, strong relationships with vendors, suppliers, contractors, and other partners remain vital.

However, we don't work with just anyone. Because our partners are often seen as a reflection of our company, we choose wisely, monitor closely, and only maintain relationships with those willing to uphold our Core Values and high standards.



### Set partners up for success.

Once we've begun working with a new partner, we make sure they have everything they need to fulfill ethical and legal requirements. We do so by:

- » Putting in place proper controls to manage risk
- » Ensuring that they understand our Supplier Code of Conduct
- » Ensuring their compliance with our [Supply Chain Social and Environmental Responsibility Policy](#), which addresses the following areas:
  - » Ethical behavior
  - » Legal and regulatory compliance
  - » Environmental, health, and safety
  - » Conflict minerals
  - » Labor and human resources, including employment practices, child labor, forced labor, and freedom of association
  - » Management systems
  - » Information access
- » Providing clarity in contractual agreements
- » Maintaining an open-door policy and monitoring performance

If a partner fails to uphold the standards set out by our team, depending on the severity of the situation, we may need to find a better fit for our company.



# WE ARE Empowered

Each of us has the ability to create value, innovate, and continuously improve through collaboration and challenging barriers.

- Committing to a Culture Free of Bribery and Corruption
- Gifting Appropriately
- Avoiding Conflicts of Interest
- Understanding Inside Information
- Following Global Trade Regulations

## COMMITTING TO A CULTURE FREE OF BRIBERY AND CORRUPTION

When customers see the Brooks logo, we want them to think of a team of people who are dedicated to keeping their promises, a team that not only delivers world class products and services, but does so professionally, fairly, and with integrity.

Together, we believe in conducting business the right way, based on the quality we provide, and never engage in bribery, corruption, or other illegal activities.

Our zero-tolerance policy ensures we comply with the law, of course. But it also helps us maintain the trust of our customers and the communities we serve every day.

### Learn how to identify a bribe.

One of the best ways to prevent bribery is to understand what a bribe is. We often think of it as a cash payment, but a bribe can take many other forms such as:

- » Favors
- » Lavish gifts
- » Business opportunities
- » Costly hospitality
- » Loans
- » Charitable or political donations

Although types of bribes can vary, there is only one message we must keep in mind: Anything of value that is offered to encourage or reward someone for doing something improper is a bribe and not the way we do business.

### Avoid bribes.

A reputation like ours takes years to build and thousands of dedicated employees to preserve. It's important to remember that in every conversation and every transaction, we are representing Brooks. A single dishonest act can raise questions about our integrity and harm our good name, so we:

- » Never offer, promise, or give a bribe.
- » Never request, agree to, or accept a bribe.
- » Don't let others bribe on our behalf.
- » Avoid even the appearance of something improper.
- » Maintain accurate records of anything given or received.
- » Never self-blind or ignore red flags of possible bribery – if you suspect something, report it.

### Deal carefully with public officials.

We never offer anything to a government employee or representative unless we have received approval in advance. Even small payments to speed up routine, administrative tasks (“facilitation payments”) are considered bribes, and we don't pay them. We stay alert and raise any requests for these types of payments to management.

### Select partners wisely.

We can be held liable for bribes made by those who work on our behalf. For those of us who make decisions about our partners, we should consider their reputation for operating with integrity. Any organization we engage must always uphold our Core Values.

## GIFTING APPROPRIATELY

Exchanging gifts and hospitality can play an important role in business relationships. A company lunch can facilitate conversation, flowers – an expression of gratitude, and promotional items may remind a vendor to reach out when needed.

However, anything too lavish or given too frequently could be perceived as a bribe. That is not how we do business. We gift in ways that make everyone we work with feel appreciated, but never pressured. We also avoid anything that could even appear improper.

### Know where the line is.

It can sometimes be difficult to know when a gift is appropriate or inappropriate. We always keep in mind that reasonable offers often include the infrequent exchange of:

- » Low- or no-cost promotional items
- » Modest gift baskets
- » Simple meals
- » Souvenirs with no cash value
- » Small bouquets



### LIVING OUR CORE VALUES TOGETHER

**One of our Suppliers sent me an inexpensive scarf to thank me for expediting the signing of their contract with Brooks. Would it be OK to accept?**

Beyond these examples and similar items of nominal value, it's important that we use good judgment and never offer or accept a gift that:

- » Isn't given for a legitimate business reason
- » Creates an obligation in return
- » Comes in the form of cash or a cash equivalent
- » Inappropriately benefits a loved one
- » Has not been accurately recorded
- » Could harm our reputation
- » Could appear improper regardless of intent
- » Violates local laws, customs, gift policies, or guidelines

### Seek approval for health care professionals and government officials.

We are extremely careful when dealing with health care professionals and government officials. There are very strict rules about what we can offer to (and accept from) both groups. Seek approval in advance before giving or receiving *anything* of value in these instances. For more information, look at our Gifts Policy.

*No, not in this instance. Although its value may be nominal, the scarf is being offered as a reward in connection with the way we conduct business and is therefore inappropriate. You should return the gift with a note explaining our policies.*

## AVOIDING CONFLICTS OF INTEREST

At Brooks, we never allow personal interests or relationships to affect our professional judgment. When that happens, it's a conflict of interest, and even the appearance of a conflict damages our brand and our business.

### Maintain our reputation for fairness.

Conflicts of interest undermine the trust others have in us. Our shareholders, partners, colleagues, and customers should feel confident that the decisions we make are in their best interests.

To avoid conflicts, we must first know how to spot them. It's not possible to list every scenario. However, we always watch out for:

- » Personal investments – investing in our partners (or those who wish to be).
- » Outside employment – working a second job that conflicts with our responsibilities or takes our full-time attention and commitment away from our work with Brooks.
- » Personal relationships – supervising a friend, romantic partner, relative, or other loved one without approval.
- » Acting as an intermediary – benefiting from a transaction involving Brooks, by acting as a broker, finder, or other intermediary.
- » Business opportunities – taking opportunities for our own personal gain that we discovered through our work here.
- » Serving other organizations – taking on an advisory role, such as a board member or consultant, for another organization without authorization.

Perception is key. Even if there is no actual conflict of interest, if it could appear as one then we avoid it.

### Disclose conflicts and potential conflicts.

We disclose all conflicts and potential conflicts to management, immediately. That way they can properly address any actual conflicts or work to eliminate the perception of one.



## UNDERSTANDING INSIDE INFORMATION

We play fair in all that we do, and we never use our position at Brooks to gain an unfair advantage – including when buying or selling stock or other securities (“trading”).

If, in the course of our jobs, we learn of nonpublic information that could impact the price of a security (“inside information”), we never trade on that information. We also do not disclose it to others so they may trade (“tip”).

These acts are considered illegal forms of insider trading, and they go against our Core Values and everything we stand for.

### Learn how to spot inside information.

Inside information is both:

- » Material, meaning it could influence someone to buy, hold, or sell securities in a company
- » Nonpublic, meaning it has not been intentionally released to the public yet

Common examples include nonpublic information about:

- » Mergers, divestitures, or acquisitions
- » Changes in leadership
- » New solutions or services
- » Financial projections
- » Pending litigation

The only time it’s OK to share inside information is if the recipient has a legitimate business need to know the information. Our managers can provide guidance if needed. Inside information applies to any company you could receive inside information about.

### Respect restriction periods.

We never trade if we have been made privy to inside information, or if we are subject to additional trading restrictions. Before buying or selling any securities, we check for any periods during which trading is generally prohibited.



### LIVING OUR CORE VALUES TOGETHER

**I have inside information about a new product our Supplier is manufacturing. This morning, one of my coworkers said that the information went public already. Would it be a good time to buy stock?**

*Possibly. However, it’s not enough to rely on what your coworker shared. Double-check with your manager and view the press release yourself first. Insider trading is a criminal offense, so you can never be too cautious.*



## FOLLOWING GLOBAL TRADE REGULATIONS

Our ideas and technologies are transforming the future, and we are poised to make these advancements worldwide. Although our position as a global market leader allows for many exciting pathways, it also requires increased care and attention.

Wherever we do business, we stay on top of all applicable import, export, and other trade compliance laws. That way we can continue our global operations and provide the best experience for our customers.

### Follow the law.

We take global trade regulations seriously. If a particular import or export is not compliant with all relevant rules, regulations, and protocols, it can be delayed, confiscated, or destroyed. Trade violations can result in reputational damage, fines, and other penalties. In severe cases, the organization or individual responsible could also be heavily fined or face jail time.

Follow Brooks' processes and procedures for all shipments and information transfers. Do not bypass Brooks' logistics processes and trade checks by shipping outside of Brooks' approved methods or by hand-carrying goods from one country to another. Check with the Trade Department or Legal Department whenever you have questions or doubts.

### Provide accurate information.

Regardless of your role, entering accurate data in Oracle® and other databases is important. Information entered into Oracle is often used for government declarations and internal compliance checks. Be especially careful to enter proper legal entity names for customers and vendors, and accurate countries of origin and prices for parts and other items.

### Follow Brooks' procedures.

Always follow Brooks' policies and procedures – this protects you and the company.



# WE ARE Accountable

Each of us owns our commitments to our customers and each other with unwavering focus on safety, integrity, and quality of delivery in everything we do.

- Delivering to Our Investors
- Keeping Accurate Records
- Protecting Confidential Information
- Safeguarding Physical and Electronic Assets
- Cooperating With Government Audits and Investigations



## DELIVERING TO OUR INVESTORS

We want Brooks to be on our planet forever. That's why we aim to create long-term value both for our communities and for those committed to and invested in us – our investors.

We relish their comprehensive feedback and never take for granted the differing experiences, backgrounds, and regional perspectives they offer as we create solutions.

In addition to the personal passions that drive our works, we know that the most successful business strategies require looking outward. We look to our investors regularly as they help us continue to evolve in the ways that best serve our customers and remain rooted in our Core Values.

### **Drive transparency.**

Transparency reigns supreme for one important reason – it builds trust. When we consistently earn the trust of our investors, we also garner ongoing cooperation and support which is critical for our success. We ensure communication with the necessary stakeholders in ways that are direct, open, and honest.

### **Ensure integrity in everything we do.**

To best deliver to our investors, we live by certain standards of conduct that are the underpinnings of our current and future success. Our values – honesty, integrity, accountability, and respect for one another and the many constituencies that we serve – always remain at the forefront.



## KEEPING ACCURATE RECORDS

In addition to manufacturing world-class products, we hold ourselves to the highest standards when it comes to conducting business as well.

We require accurate recording and reporting of information because it helps us make responsible business decisions.

Also, being honest and direct builds a foundation of trust with our customers and community and keeps them investing in our company.

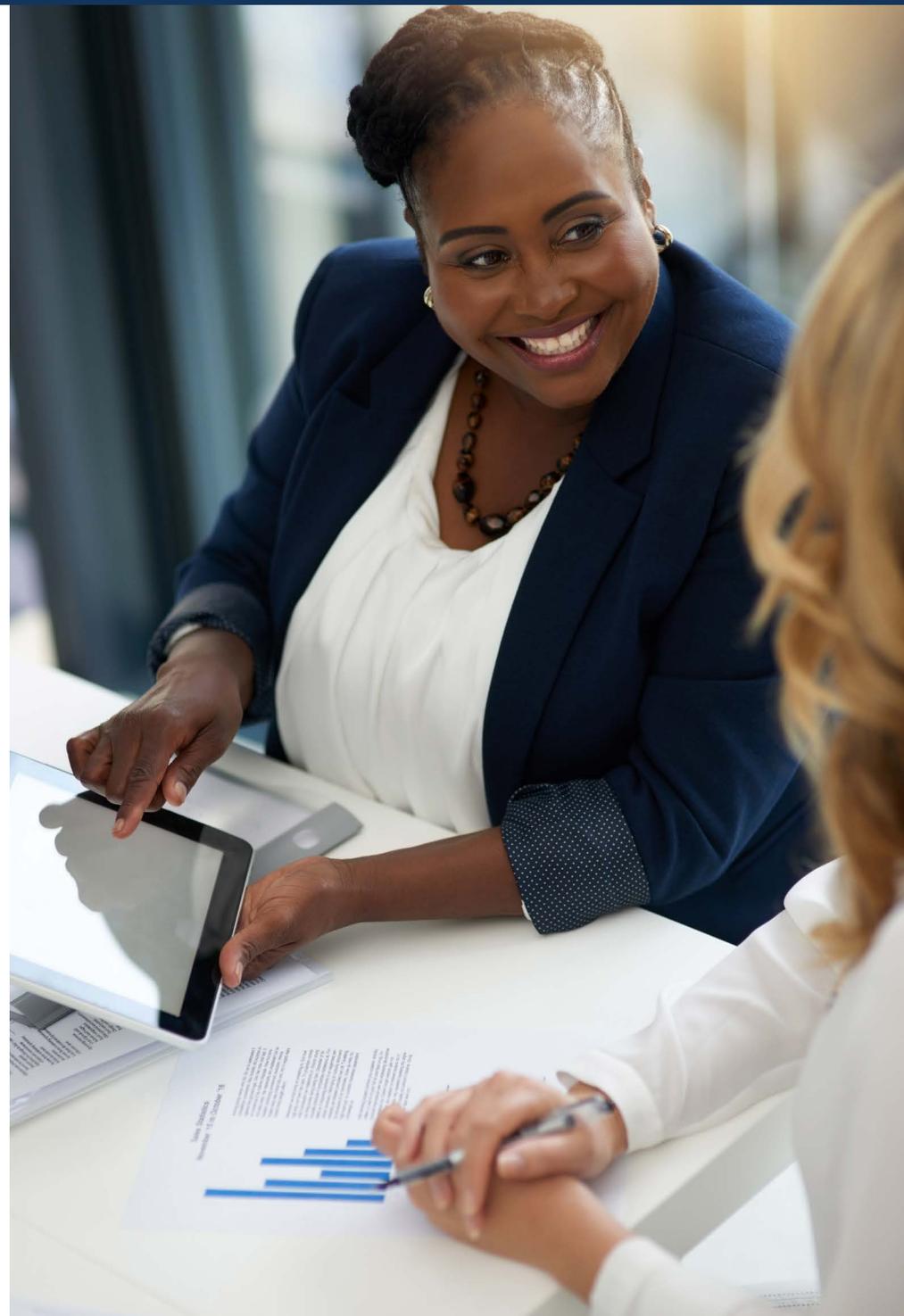
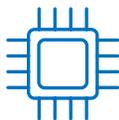
### Record accurately.

To keep our **business records** as accurate as possible, we:

- » Record carefully, completely, honestly, and in ways that are easy to understand.
- » Keep pertinent and relevant documents in accordance with our policies.
- » Never let anyone pressure us into recording something that's not true.
- » Report any suspicions of fraud or other wrongdoing right away.

**Business records** can include documents regarding any aspect of our operations, including data on:

- > **Quality**
- > **Personnel**
- > **Safety**
- > **Finances**



## KEEPING ACCURATE RECORDS

### Comply with our policies and the law.

In addition to recording accurately, we make sure to:

- » Comply with required accounting principles and internal controls, when applicable.
- » Never establish any undisclosed, unrecorded, or off-the-record accounts for any purpose.
- » Only sign and approve documents when authorized to do so.
- » Record as if all documents and communications will become public one day, by avoiding:
  - » Exaggeration
  - » Colorful language
  - » Guesswork
  - » Legal conclusions
  - » Derogatory remarks
- » Follow our records retention policies.
- » Never destroy or discard anything connected to litigation or another legal proceeding.



### LIVING OUR CORE VALUES TOGETHER

**I saw a team member sign off on an inventory count that they didn't complete. It's not my department, so should I just stay out of it?**

*No. Falsifying records is never OK, and although it wasn't your department, keeping accurate records is everyone's responsibility. Speak up.*



## PROTECTING CONFIDENTIAL INFORMATION

Our customers trust us to deliver solutions that work – the first time and every time. A reputation like this doesn't develop overnight. It comes from years of prioritizing the customer journey in ways that build trust.

One way in which we build trust is by protecting the **confidential information** in our care. When we prevent the loss, damage, unauthorized use, disclosure, and modification of confidential information, we send the message that we work with integrity, always.

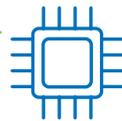
### Know what's considered confidential.

Confidential information plays an important role both in our personal lives and in our business success. With it, we can cater to our customers, promote and protect our colleagues, and keep our competitive edge. Safeguarding it is paramount, so we make sure we know how to spot it.

We also take precautions before disclosing anything confidential and assume that all nonpublic information is confidential until confirming otherwise.

**Confidential information** includes anything that has not been released to the public that is intended to be protected from disclosure, including:

- > *Personal data (e.g., name and address)*
- > *Intellectual property (e.g., copyrights and trademarks)*
- > *Business data (e.g., budgets and pricing information)*
- > *Personnel files (e.g., home address and medical records)*



## PROTECTING CONFIDENTIAL INFORMATION

### Know how to protect what's considered confidential.

At Brooks, we only share confidential information (whether it's about individuals, our company, or that of a third party) with those who need it to perform their jobs. To keep confidential information protected, we:

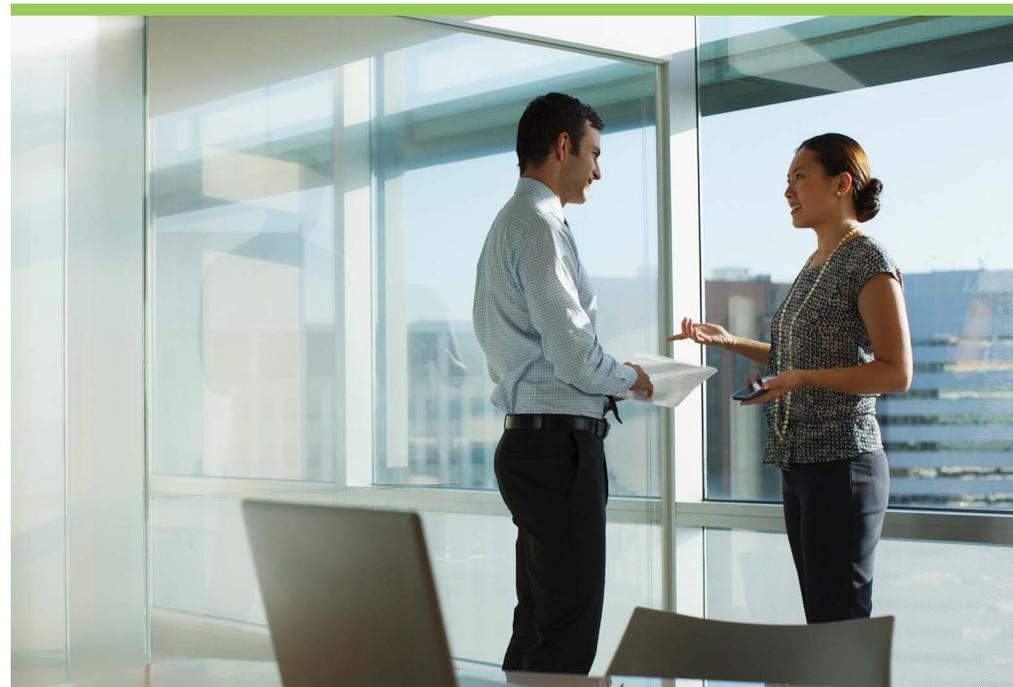
- » Comply with all applicable laws in the countries and regions in which we do business, including the General Data Protection Regulation.
- » Follow all records management policies so information is labeled, handled, stored, and disposed of appropriately.
- » Are careful not only about what we share, but where we share it. Specifically, we avoid:
  - » Leaving confidential information in plain sight
  - » Discussing private matters in public places
- » Work vigilantly to avoid falling victim to phishing and other cybersecurity attacks.
- » Ensure any third parties who have a business need for confidential information sign a non-disclosure agreement before handling it.
- » Remember to protect our private and confidential information even if we leave Brooks.



### LIVING OUR CORE VALUES TOGETHER

**Based on blueprints my team put together, I developed a design idea for a toy robot. It would in no way compete with Brooks' business and the design is my own. Could I potentially sell it?**

*No. We honor our intellectual property and never use Brooks' copyrights (like blueprints in many instances) for personal commercial use.*



## SAFEGUARDING PHYSICAL AND ELECTRONIC ASSETS

Our assets and IT systems (everything we own and use for work) deliver great value. From facilitating our productivity to driving growth, our assets are essential to our success.

To keep our operations running optimally, we protect all physical and electronic assets from theft, misuse, loss, and damage. We only use them for approved business purposes and in legal and ethical ways. By safeguarding our assets, we're also helping to safeguard our company, our customers, and each other.

### Handle physical assets with care.

Physical assets include everything we can see and touch – for example, our computers, phones, office supplies, and furniture. To care for them, we:

- » Keep inventory of everything in our care.
- » Maintain the assets assigned to us.
- » Report any operational issues or assets needing repair.
- » Never borrow, lend, sell, or gift without authorization.

### Safeguard electronic assets.

We take the appropriate measures to keep our electronic assets, such as servers, emails, internet access, and voicemails safe. We:

- » Follow company guidelines.
- » Protect user IDs and passwords.
- » Never open suspicious emails or click suspicious links.
- » Never install unauthorized software.

Also, we keep in mind that Brooks has a responsibility to monitor company systems and devices, including personal devices used for work purposes. We keep personal use to a minimum and know that anything we write, download, store, or transmit could be reviewed in accordance with applicable laws.



## COOPERATING WITH GOVERNMENT AUDITS AND INVESTIGATIONS

We are fortunate enough to have offices all over the world, and we know the importance of building honest and transparent relationships with the governments located everywhere we operate. Occasionally, we may be asked to participate in government audits or investigations. In these circumstances, we work swiftly and cooperatively to ensure a full and fair process.

### Work with integrity, always.

Although we can't always predict government audits and investigations, we can always be prepared for them. That's why we:

- » Identify risk areas and provide or take on additional training when needed.
- » Conduct internal audits – finding and correcting issues as we work.
- » Know and follow all relevant standards, such as the [RBA Code](#).

### Seek guidance.

If we ever receive an inquiry from a representative of the government, whether in person, via mail, over the phone, or electronically, we immediately notify management and the legal department to oversee the response. They will help ensure that we communicate in ways that are knowledgeable and helpful.

### Fully cooperate.

If we have been authorized to directly respond to a government request, we:

- » Provide accurate and complete information.
- » Never obstruct or attempt to improperly influence an audit or investigation.
- » Never lie or make false or misleading statements – verbally or in writing.
- » Never attempt to persuade someone else to provide false or misleading information.



### LIVING OUR CORE VALUES TOGETHER

**I recently saw on the news that one of our suppliers is under investigation. None of it is tied to their work with us. Is there anything I need to do?**

*Yes, share the information (and the source) with management. Our partners are seen as a reflection of us, and we need to make sure they're upholding our Core Values.*





# WE ARE Respectful

**We are respectful of one another, valuing Diversity, Equity, Inclusion, and honoring our commitments, knowing our greatest strength comes from the differences and unique perspectives that everyone brings.**

- **Fostering Diversity, Equity, and Inclusion**
- **Respecting Each Other**
- **Promoting a Safe and Healthy Workplace**
- **Upholding Human Rights**
- **Caring for Our Environment**

## FOSTERING DIVERSITY, EQUITY, AND INCLUSION

As a global leader in automation, we strive for an employee base that represents the diverse backgrounds, perspectives, and experiences of those we serve. Our diversity strengthens us as an organization, so we work hard to not just attract the right talent, but to develop and keep them.

We each do our part by helping to ensure every member of our team feels valued, included, and respected. We observe fair employment practices, never tolerate discrimination, and promote an environment where everyone remains motivated to be their best self.

### Value all forms of diversity.

As members of Brooks, we commit to a workplace that's inclusive of every age, gender, gender identity, race, sexual orientation, physical capability, neurological difference, ethnicity, belief, and perspective.

We uncover and challenge any privilege or bias (implicit or otherwise) we may have so that we make employment-related decisions on objective criteria. We also reach out to, work with, support, and advance others because they are qualified, not because of unfair assumptions or generalizations.

### Value your own individuality.

We recognize what sets us apart and the unique value that we bring. When we sharpen our individual skill set and take advantage of both personal and professional development, not only do we advance our career, we set an example for those around us to do the same. Diversity and inclusion thrive when we do.

### Swap the Golden Rule for the Platinum Rule.

We have all been told to treat others the way we want to be treated. What if we treat others the way THEY want to be treated instead? When individuals have differing standards and belief systems, they don't always want the same treatment or outcome in a situation. Let's make it our business to find out how those around us wish to be treated, and if it aligns with our Core Values, act accordingly.



### LIVING OUR CORE VALUES TOGETHER

**Your team is interviewing two candidates with similar qualifications. Someone suggests picking the applicant whose personality is a better fit. Smart move?**

*Not necessarily. Implicit bias may be steering your colleague in the wrong direction. It would be better to focus on objective criteria, such as knowledge, skills, and abilities, while remaining open to hiring someone with a more unique temperament or perspective.*

## RESPECTING EACH OTHER

We can accomplish more together than we ever could alone or in conflict. Let's each work to promote a collaborative and inclusive work environment free of harassment, bullying, and abuse. We may do so by treating everyone with dignity, respecting others' opinions (whether we agree with them or not), and finding ways to empower everyone to be their best self. This level of respect is the foundation of a healthy, productive workplace.

### Start with self-respect.

We are clear about our personal standards and boundaries and instruct others on how we'd like to be treated. Communicating our needs improves our sense of well-being and increases our chances of being met with the appropriate care.

### Learn how to identify disrespectful behaviors.

We have a zero-tolerance policy when it comes to harassment and other forms of disrespectful behavior, such as bullying and abuse. To put a stop to such conduct, we must be able to recognize it first.

Harassment is considered intimidating, hostile, or offensive conduct that:

- » Interferes with someone's ability to work, or
- » Creates a hostile work environment

This is particularly the case with mistreatment based on a characteristic protected by law, such as race, age, gender, or sexual orientation.

Of course, some abusive and bullying behaviors are not tied to a protected characteristic. However, they still violate our policies and our sense of what's right. These types of behaviors have no place at Brooks.

### Stay alert for sexual harassment and other forms of unlawful harassment.

At Brooks, we create and maintain an environment that is safe for all. We each have a responsibility to speak up if we see, experience, or suspect any form of sexual harassment including:

- » Sexual advances or requests for sexual favors
- » Inappropriate touching
- » Sharing of sexual materials
- » Continuing to make sexual advances after being told "no"



## PROMOTING A SAFE AND HEALTHY WORKPLACE

Good health is central to who we are and what we do, and it is among our highest priorities. That's why we regularly implement safety trainings, policies, and procedures and swiftly respond to all reported health and safety concerns. To support company efforts, we each need to actively champion the behaviors and attitudes necessary to prevent work-related injuries, illnesses, and property damage.

### Be vigilant.

Taking proper precautions is the best way to protect everyone from harm. To ensure we all have a safe place to work, we:

- » Complete all required training and only operate equipment on which we are trained.
- » Wear personal protective equipment whenever and wherever required.
- » Follow all posted warning signs and restrictions as well as the safety requirements applicable to our jobs.
- » Keep our workspaces tidy, and free of clutter and spills.
- » Keep equipment properly maintained and in good working order.
- » Never work under the influence of illegal drugs or alcohol.
- » Speak to our managers about any legally prescribed drugs that could affect our performance.
- » Report all workplace dangers and hazards, including threats, violence, or **potentially violent behavior**.
- » Immediately contact emergency services if anyone is in immediate danger.



### LIVING OUR CORE VALUES TOGETHER

**Lately I have been feeling overwhelmed by work and family responsibilities. I don't want to discuss the matter with my manager. Is there anyone else I can talk to?**

*Yes, contact another manager you trust or a member of the Human Resources organization. You can speak confidentially and find out about resources available to discuss your workload and help you manage and prevent stress.*



## UPHOLDING HUMAN RIGHTS

We strive to improve the lives of our customers, but we don't stop there. We work to protect the rights and freedoms of Brooks employees and others within our supply chain. We speak up about any potential human rights breaches, treat others with dignity and respect, and work with partners who commit to doing the same.



### Value your time as much as we do.

The time and talent we bring to our company go a long way. We want to ensure that during our tenure here, we are compensated fairly and that we maintain balanced lives. That's why we:

- » Take the breaks and days off we're entitled to.
- » Accurately record any time worked if required by law.
- » Never exceed maximum working hours as set by local law.
- » Balance the needs of our work lives with those of our personal lives.
- » Speak up if we have questions about pay, benefits, or working conditions.

### Watch out for each other.

We prioritize the protection of human rights by upholding prohibitions on:

- » Modern slavery
- » Human trafficking
- » Child labor
- » Physical punishment
- » Forced labor
- » Inhumane treatment

We also find ways in our day-to-day interactions to promote diversity, respect, and fairness.

### Reject conflict minerals.

We work closely with suppliers of raw materials, parts, and components and communicate our expectation that our partners will comply with all applicable laws, including laws aimed at providing conflict-free minerals.

### Monitor partners closely.

We never knowingly do business with any company that violates human rights laws or engages in human rights abuses. We watch our partners closely and make sure they watch their partners as well.

## CARING FOR OUR ENVIRONMENT

As a global company, we understand the broad impact of our operations and our potential to affect the world. We are committed to evaluating ways to reduce our environmental footprint while continuing to expand our business. Let's each work to protect the natural environment and conserve natural resources by complying with all applicable environmental policies, programs, and laws.

### Prevent waste.

We manage and reduce waste and hazardous waste production through ever-expanding reuse and recycling activities. Development of waste metrics is helping us track progress at each facility and drive continuous improvement. We recycle:

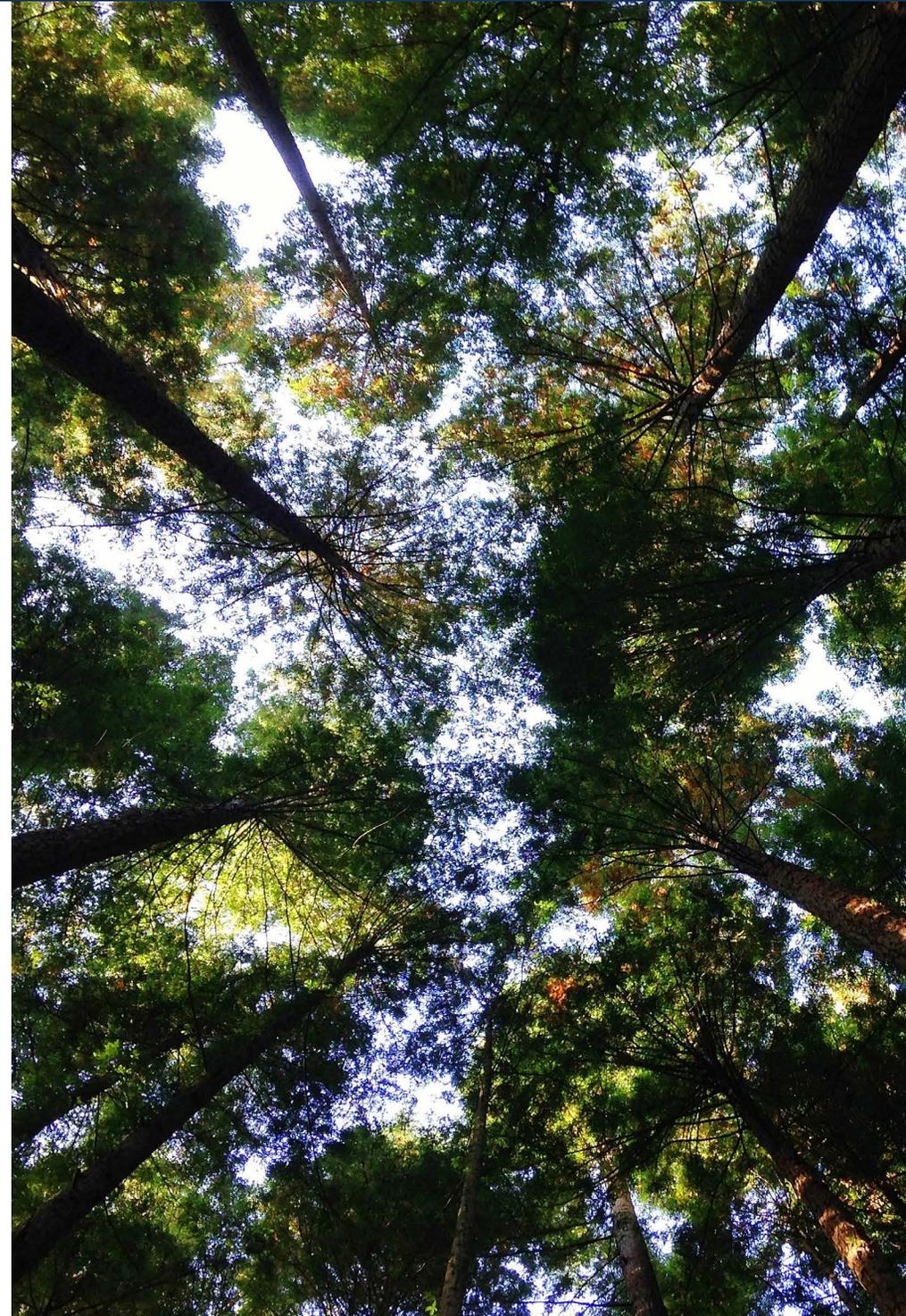
- » Office paper
- » Wood
- » Scrap metal
- » Corrugated cardboard
- » Lamps
- » Bottles
- » Cans

### Reduce emissions and hazards.

We recognize the importance of eliminating hazardous substances from our products and dangerous emissions from the air. We need every member of our team to comply with all applicable laws and cooperate with routine monitoring of our air emission control systems.

### Properly manage energy and water use.

We work proactively to reduce our overall energy consumption and increase the energy efficiency of our operations. Our efforts include evaluation of renewable energy options across facilities and installation of electric vehicle chargers.





# WE ARE Engaged

**We act with pride, passion, and focus to deliver valued results to our customers, employees, global communities, and investors.**

- Engaging Employees
- Communicating Responsibly
- Giving to Our Communities
- Performing Civic Responsibilities



## ENGAGING EMPLOYEES

At Brooks, we aim to create a high-performing workplace where everyone has pride in what we do, how we do it, and whom we do it for. That's why we make it our mission to engage every employee's mind and heart – supporting their purpose, considering their feedback, and creating a path within our organization that will satisfy them for years to come.

### Understand our vision.

Our company exists to build a better future, and it's important for each of us to consider how that aligns with our personal goals. As we continue to embrace innovation and challenge the status quo, let's each evaluate and reevaluate how our skills will be best applied. We strive to empower our employees in maximizing career potential at Brooks.

### Motivate and inspire others.

Passionate teams are comprised of more than managers and employees. They're comprised of coaches, confidants, and cheerleaders. At Brooks, we bring out the best in each other and work together to create an environment where everyone feels connected, empowered, and included. Doing so cultivates confidence and motivates all of us to perform our best work.



## COMMUNICATING RESPONSIBLY

At Brooks, there are thousands of us who form one team, and we want our collective voice to be heard. To better communicate important information about our company, we have designated specific employees to speak on our behalf and respond to questions from the media, public, and others.

### Forward requests

Unless we've been authorized to speak on Brooks' behalf, we forward all inquiries to [Global Communications](#).

### Seek approval.

Our employees are often invited to participate in activities such as keynote speeches, panel discussions, podcasts, and more. We must ensure that any messaging about our company is clear, accurate, and aligned with our Core Values and brand. That's why we seek approval before representing Brooks in any capacity.

### Use social media responsibly.

It's important to remember that no matter how personal social media feels, it is still a public platform. What we say as individuals matters and can, at times, be seen as a representation of Brooks. That's why:

- » If posting about Brooks, we always disclose our relationship with the company and label posts as personal and purely our own.
- » We never share confidential business information, including any nonpublic information that is financial, operational, or legal in nature.
- » We avoid posts that are malicious, obscene, threatening, or bullying, or that could contribute to a hostile work environment on the basis of a protected characteristic.

Nothing in our Code or our policies is intended to interfere with our right to speak publicly about matters of public concern or to engage in protected concerted activities related to the terms and conditions of employment.



### LIVING OUR CORE VALUES TOGETHER

**A reporter called to ask for a comment in connection with my work. I know the answer to her question. May I tell her what she wants to know?**

*No. You should not answer any questions from reporters unless you are authorized to do so or receive approval first. Forward their inquiry to [Barbara Culhane](#) instead.*



## GIVING TO OUR COMMUNITIES

We are committed to making a positive impact on society, particularly in the regions where we are located and serve customers. Together, let's make meaningful contributions through community outreach, charitable giving, and our employee volunteerism programs.

### Give with us.

When we pool our time, talent, and resources together as a team, we can do more. That's why we focus on giving back to our communities – leading in robotics, automation, and STEM (science, technology, engineering, and math), and building for the future.

### Give on your own.

Because we are such a diverse group, we understand that we may differ in our support of charitable causes as well. If giving on a personal basis, we make sure to:

- » Avoid conflicts of interest.
- » Use our own time and resources.
- » Never pressure coworkers.
- » Make it clear our views are our own.



## PERFORMING CIVIC RESPONSIBILITIES

We are a global company with a uniquely cohesive and collaborative culture. No matter where we are situated, we come together as employees of Brooks to accomplish great things for our communities.

Brooks supports and encourages each of us to exercise our individual civic responsibilities. However, we ask that everyone show respect to our team in the process and keep personal activities just that – personal.

### Keep it personal.

Whether donating time or money or providing an opinion, let's make sure it's clear that our political activities do not involve Brooks.

In this effort to keep politics separate from profession, we also avoid using Brooks resources (e.g., email or facilities) for our own political activity or pursuits.

### Follow the law.

We follow all applicable laws, rules, and regulations as they relate to Brooks political contributions and expenditures. Also, we:

- » Seek approval before interacting in ways that could be viewed as lobbying.
- » Never pressure employees to support a political candidate or party.
- » Avoid conflicts of interest and the appearance of such.



### LIVING OUR CORE VALUES TOGETHER

**I have a good friend who is running for political office and has asked if I would endorse her at a rally being held outside work hours. Is that a problem?**

*No, generally this should not be a problem, but if your association with our company is known, make it clear that your endorsement has nothing to do with your connection to Brooks.*



## WE ARE HERE TO HELP



For more information on what's required of us as Brooks employees, look to our [Policy Library](#).



If you see, experience, or suspect wrongdoing, contact the hotline.



Policy Library: [Company Policies](#)



For any questions or concerns about the Code, contact the [Legal Department](#).



Phone: [844-984-1747](tel:844-984-1747)



To better understand our obligations under the Responsible Business Alliance, look to the [RBA Code](#).



**International Hotline:** For a complete list of access codes, go to [Company Ethics Hotline](#).



Email: [ethics@brooks.com](mailto:ethics@brooks.com)



Those with accounting-related or financial reporting concerns who would also like to communicate directly with the Audit Committee or our Board of Directors, may call [978-262-7444](tel:978-262-7444).

