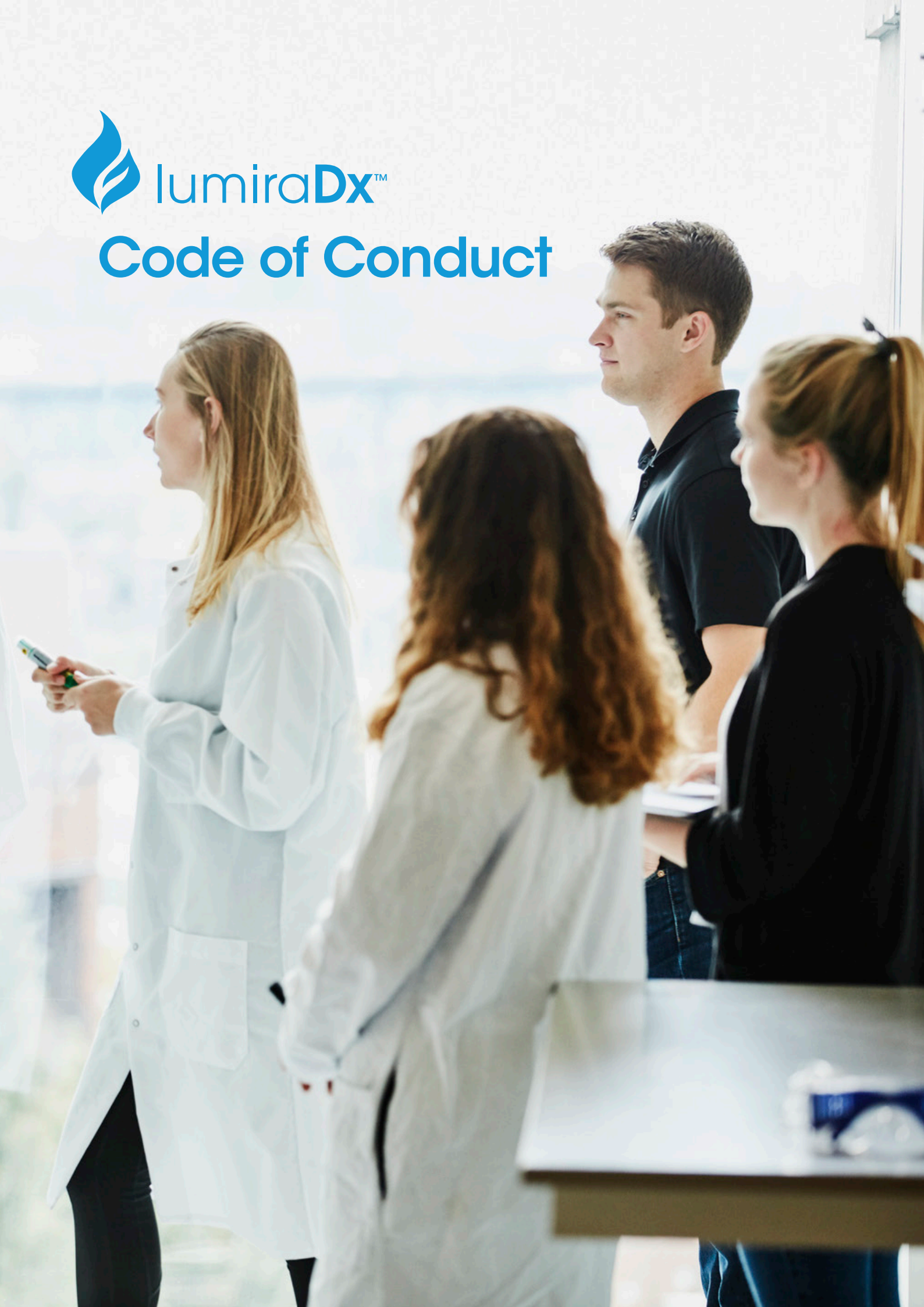




LumiraDx™

Code of Conduct



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1.0 Introduction

The LumiraDx Code of Conduct sets forth standards for business behavior that apply throughout the LumiraDx Group. It reaffirms our commitment to maintaining the highest level of ethical standards in the conduct of our business. The foundation of LumiraDx's business conduct program is this: we will do business legally and ethically in all aspects of our global operations.

Integrity is the key to establishing and preserving our good reputation and the delivery of quality services to our customers.

Although strong financial performance is paramount to our success, consistent and sustainable growth of the company can only be achieved by recognizing the interests of those we touch in all aspects of our business. In doing so, we take into consideration the interests of our customers, employees, shareholders, investors, and suppliers, as well as the environment and the local communities in which we operate.

This Code of Conduct aims to provide guidance and support to enable us to carry out our business with integrity and in compliance with the law. The principles and standards set out in this Code are supplemented by internal policies and procedures, which together establish a framework in which we can exercise our responsibilities. All directors, officers and employees are required to observe not only the letter but also the spirit of this Code of Conduct.

If any questions arise regarding what behaviour is appropriate in any given situation, or if you are ever concerned that our Code is not being followed, please speak up and share your concerns without hesitation.

Reporting a Concern

LumiraDx is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management if you are ever concerned that our Code of Conduct is not being followed.

Concerns can be raised in person or anonymously to your local management team, at group level, and by contacting HR.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use the LumiraDx EthicsPoint hotline. You are encouraged to submit reports relating to violations stated in this Code of Conduct, as well as asking for guidance related to policies and procedure and providing positive suggestions and stories.

The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. You have our guarantee that your comments will be heard.

You can do this via the web at lumiradx.ethicspoint.com or via the LumiraDx EthicsPoint hotline. Country specific numbers can be found at lumiradx.ethicspoint.com.

Responsibilities

Our reputation is just as valuable as our employees and company assets. It is the personal responsibility of

each of us to maintain it by putting our Code of Conduct into practice.

Our directors, officers and employees generally have other legal and contractual obligations to LumiraDx. This Code of Conduct is not intended to reduce or limit the other obligations you may have to LumiraDx. Instead, this Code of Conduct should be viewed as imposing the *minimum standards* we expect from our directors, officers, and employees in the conduct of our business.

2.0 LumiraDx Corporate Principles

LumiraDx's success is based on creating innovative, high-quality products and services. What matters to us and our customers is trust in the right information, available when and where it's most effective to direct appropriate care and deliver better outcomes. We commit to empower diagnostic-led care that delivers better health, better experiences, and better value. As such we want to enable health professionals and their patients to make more informed decisions, take more appropriate action and achieve better outcomes.

LumiraDx's principles of business conduct define the way we do business worldwide.

These principles are:

- **Compliance with laws, rules regulations.** Compliance with all applicable laws and regulations must never be compromised. Additionally, employees shall adhere to internal policies and rules as they apply in each situation. Those internal rules may go beyond what is required by law as LumiraDx desires to set the highest legal and ethical standards.
- **Commitment to Service our Customers and Patients through High Quality Delivery and Product Safety.** Our core is to deliver high quality and safe products and services. We aim to provide products and services that are accurate, reliable, timely and safe. Customer trust is key. Our reputation rests on the quality of our products and services. We furthermore aim to respond quickly and promptly to any legitimate concerns or complaints raised and employees should speak up when any quality issues are identified.
- **Respect and honesty.** LumiraDx wants to treat customers, suppliers, employees, and others with respect and courtesy. We aim to demonstrate honesty and high ethical standards in all business dealings. We tell our story simply, honestly and in clear and everyday language. This includes requiring our suppliers, agents, subcontractors, and their employees to demonstrate honesty, integrity, and fairness, and to adhere to our non-negotiable standards. In the same way we are committed to our customers.
- **Leadership and Personal Responsibility.** Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement, protect their privacy, and do not tolerate any form of harassment or discrimination. We want our people to develop their talents and make optimal use of their abilities and potential and to encourage information-sharing and open dialogue. We aim to provide recognition based on performance and contribution to LumiraDx's success.
- **Safety and health at work.** We are committed to preventing accidents, injuries and illness related to work, and to protect employees, contractors and others involved along the value chain.

- **Commitment to Innovation.** Innovation across all aspects of our business is the key to our success. We see change as an opportunity and complacency as a threat. We foster a culture of innovation and seek new possibilities and therefore encourage everywhere in the company the curiosity needed to be open to the world and new ideas. We are open to unconventional ideas and aim to recognize new trends at a very early stage.
- **Corporate Social Responsibility.** We want to maintain high ethical and social standards in our business dealings; in our efforts to protect the environment; and to ensure good citizenship. We are committed to the respect of human rights and principles of sustainability. For us, this includes the responsible – that is, the efficient and effective – use of available resources, at present and in the future. We achieve sustainability when we establish an acceptable balance between the economic requirements of our corporation and the valid expectations of all those who share in our success (the stakeholders). We conduct an open and constructive dialog with all relevant stakeholders.
- **Responsible Communication.** We are committed to responsible, reliable market and consumer communication that empowers consumers to exercise their right to informed choice and receiving better outcomes. We respect patient privacy in line with all applicable laws.
- **Confidentiality.** We aim to protect the confidentiality of LumiraDx’s information and the information of our customers, suppliers, and employees (including patient information).

3.0 Your Responsibilities

LumiraDx’s Code of Conduct and other policies and principles apply to employees, directors, independent contractors, consultants, and others who do business with LumiraDx.

We expect all our employees to:

- **Follow the policy.** Comply with LumiraDx’s Code of Conduct, principles, and all applicable legal requirements.
- **Speak up.** If you have knowledge of a possible violation of LumiraDx’s Code of Conduct or other LumiraDx policies, or legal or regulatory requirements, you must notify either your manager (provided your manager is not involved in the violation), HR, Legal, or where applicable Finance.
- **Use good judgment.** Apply LumiraDx’s principles of business conduct, review our policies, review legal requirements, and then decide what to do.
- **Ask questions.** When in doubt about how to proceed, discuss it with your manager, your Human Resources representative, or the General Counsel.

Failure to comply with LumiraDx’s Code of Conduct, or failure to report a violation, may result in disciplinary action up to and including termination of employment or the end of your working relationship with LumiraDx.

Concerns or questions regarding potential violations of the Code of Conduct, a Company policy or procedure or laws, rules or regulations relating to accounting, internal accounting controls, or auditing or securities law matters will be directed to the Audit Committee of the Board (the “Audit Committee”) or a designee of the Audit Committee in accordance with the procedures established by the Audit Committee for receiving, retaining and treating complaints regarding accounting, internal accounting controls or auditing matters. Officers and employees can also communicate directly with the Audit Committee or its designee regarding such matters by following the Audit Committee Complaint Procedures.

LumiraDx will not retaliate—and will not tolerate retaliation—against any individual for filing a good-faith complaint with management, HR, Legal or Finance, or for participating in the investigation of any such complaint.

4.0 Products and Services

Quality Standards of Our Products and Services: High Quality and Safety

Providing high quality innovative products and services is a fundamental pillar of our business.

LumiraDx's vision is to achieve better outcomes, reduce costs, and improve the experience for patients and their care team thus enhancing people's health and quality of life.

Quality, safety, and innovation are fundamental pillars of our strategy and culture. LumiraDx wants to achieve high standards of quality in everything it does.

LumiraDx's quality management is focused on regulatory compliance, being responsive to changing market situations and efficient business processes. Innovation here is seen as critical as it drives improvement and increased quality.

LumiraDx expects that its business partners also adhere to its high-quality standards.

Patient safety and timely reporting of any adverse events and customer complaints is of the utmost importance.

LumiraDx employees are expected to:

- Comply with legal and regulatory requirements as well as internationally acknowledged good practices
- Ensure that its business partners adhere to LumiraDx high-quality standards.
- Immediately report adverse events relating to LumiraDx products to the local regulatory and quality function.
- Immediately report customer complaints relating to LumiraDx medical devices to the local regulatory and quality function.

Further details on the importance of quality and patient safety are implemented through the global and local regulatory policies.

Sale and Promotion of Our products

LumiraDx promotes and sells its products with honesty and integrity and for the purpose for which they are intended and approved. LumiraDx's activities conform with regulatory licenses and approvals obtained from government agencies.

5.0 Conduct in the Workplace

We foster a culture of openness, recognizing the strength of diversity

LumiraDx is committed to maintaining a work environment that respects the dignity of each person and provides the best opportunity for each person to deliver outstanding performance. LumiraDx provides equal opportunities for all LumiraDx employees. We base employment decisions on business needs, skills, experience, and relative work performance. We strive to ensure that all LumiraDx employees are supported and feel inspired to succeed. We treat everyone with respect and dignity.

Non-Discrimination and Diversity

LumiraDx is committed to providing a workplace free of discrimination and sexual harassment, as well as harassment or discrimination based on such factors as race, color, creed, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or expression, genetic information, physical or mental disability, pregnancy, medical condition, or any other basis protected by local law.

If you feel that you have been harassed or discriminated against or have witnessed such behavior, report the incident to any member of the Human Resources department, any supervisor or manager, up to, and including, the CEO, or the Business Conduct Helpline.

Respect and Dignity. No Harassment and Violent Conduct in the workplace.

The welfare of LumiraDx personnel and safe and healthy working conditions are of paramount importance to LumiraDx. We treat everyone with respect and dignity. LumiraDx does not accept bullying, or its employees being subjected to offensive, abusive, or other unwanted behavior at the workplace which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment for the victim (e.g., physical, sexual, psychological, verbal or any other form of harassment), through all aspects of the employment relationship, such as hiring, assignments, promotion, compensation, discipline, and termination.

Substance Abuse

LumiraDx is committed to providing a safe and drug-free environment to protect the health and well-being of all our employees. LumiraDx does not accept the sale, purchase, use, possession on, or being under the influence of, alcohol or any illegal substance while on the company's premises or at any company-sponsored or business-related function. LumiraDx employees are allowed to consume alcohol, in limited and reasonable quantities, if it is provided by the company at a company or other business-related function, and only if your consumption does not interfere with your duties at the function or the company's reputation. Employees are prohibited from manufacturing, distributing, dispensing, possessing, using, or being under the influence of illegal drugs in the workplace. Use of alcohol or medications on the job or before work can cause safety issues, damage customer relations, and hurt productivity and innovation. Use good judgment and keep in mind that you are expected to perform to your full ability when working for LumiraDx.

Data Privacy and Protection

LumiraDx respects people's privacy and the confidentiality of personal information. Personal information is

only acquired and kept for the purposes of operating our business effectively or complying with the law. Once collected, personal information will be kept and processed in accordance with applicable data privacy and data protection laws.

6.0 Personal Integrity

Conflicts of Interests

Personal interests must not unduly influence our professional judgment

A conflict of interest exists when an employee's or director's personal interests are inconsistent with those of LumiraDx and create conflicting loyalties.

Examples of potential conflicts of interest include:

- Engaging with a customer where close relatives are employed by the customer in relevant business areas;
- Appointing a vendor or supplier to LumiraDx where you have a financial interest in that third party;
- Hiring a relative for a position within LumiraDx;
- Investing in or otherwise providing a benefit to a competitor of LumiraDx; or
- Investing in a current or prospective vendor or supplier to LumiraDx.

At LumiraDx, employees and directors should make business decisions based on the facts, fairly and without unfair influence. Unfair influence includes influence by personal concerns and family members. You must take care not to consider personal concerns or family matters when making decisions on your job.

Wherever possible, conflicts of interest should be avoided. Where they do or may happen, they should be disclosed to the General Counsel and carefully managed, to avoid even the appearance of improper behavior.

If you are unsure whether a conflict exists concerning family members or close personal friends, you should discuss the situation with your manager, Human Resources, the General Counsel, or the CEO to avoid actual or perceived conflicts of interests.

Outside Employment and Inventions

LumiraDx employees must notify their manager before taking any other employment. In addition, any employee (full-time or part-time) who obtains additional outside employment, has an outside business, or is working on an invention must comply with the following rules.

Do not:

- Use any time at work or any LumiraDx assets for your other job, outside business, or invention. This includes using LumiraDx workspace, phones, computers, Internet access, copy machines, and any other assets or services.
- Use your position at LumiraDx to solicit work for your outside business or other employer, to obtain favored treatment, or to pressure others to assist you in working on your invention.
- Participate in an outside employment activity that could have an adverse effect on your ability to

perform your duties at LumiraDx.

- Use confidential LumiraDx information to benefit your other employer, outside business, or invention.

Gifts

We neither give nor accept gifts or entertainment that could raise concerns about our personal integrity

Even when gifts or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and perceived as an improper advantage to create influence. We must not give or accept any gifts or entertainment that could raise any concerns regarding our personal integrity or LumiraDx's integrity and independence.

To avoid both the reality and the perception of improper relations with existing or potential business partners, both public and private, LumiraDx directors and employees should adhere to the LumiraDx Gifts and Entertainment Policy.

Insider Information

Employees, officers, and directors who have material non-public information about LumiraDx or other companies, including our suppliers, manufacturers, and customers, because of their relationship with LumiraDx are prohibited by law and company policy from trading in securities of LumiraDx or such other companies, as well as from communicating such information to others who might trade based on that information. To help ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, we have adopted an Insider Trading Policy, which is distributed to employees and is also available from the Legal Department.

If you are uncertain about the constraints on your purchase or sale of any LumiraDx securities or the securities of any other company that you are familiar with by virtue of your relationship with LumiraDx, you should consult with the General Counsel before making any such purchase or sale.

7.0 Compliance with Laws

LumiraDx employees are expected to act within the bounds of applicable laws, rules, and regulations of the countries where we do business. The application of these and other laws can be complex and fact dependent. If you have any questions about the applicability of interpretation of any law, rule, or regulation, you should contact the Legal Department.

If you have any questions about whether a particular course of conduct is proper or legal, please seek guidance from the Legal Department, the General Counsel, or the CEO. If you become aware of any illegal or improper conduct, you must notify the General Counsel.

Anti Corruption

We will not engage in bribery or corruption in any form, whether in the private or public sector. In all aspects of our business, LumiraDx directors and employees are expected to abide by the Anti-Bribery and Corruption Policy. This means we must never offer, solicit, promise, give or accept a bribe, kickback, or any other improper payment.

We will seek to influence the policies and actions of our other business partners so that they too meet their ethical and legal responsibilities. All business partners who act on behalf of LumiraDx must comply with applicable bribery and corruption laws.

Dealing with Public Officials

We interact with public officials in an open and transparent manner. We will ensure that any information provided to a government or a regulatory body is true and accurate.

It is never appropriate to attempt to influence a decision by offering personal benefits to a public official. Contact the General Counsel before you offer or give a gift or entertainment to a public official or pay for their travel.

A public official is an employee, official, or any individual acting on behalf of any government bureau, department, or agency of any level; a public international organization; a political party; or any company owned or controlled in whole or in part by a government. Public officials may also include candidates for political offices.

International Trade

LumiraDx employees must also comply with all applicable international trade laws and regulations. These laws and regulations apply to the import and export of goods and technical data to and from the UK, U.S. and other countries, transactions or dealings with sanctioned countries and restricted parties, and anti-boycott requests.

If you have any questions about whether a transaction involving LumiraDx complies with all applicable sanctions and trade-embargo programs, you are required to contact the Legal Department immediately.

Antitrust and competition laws

Antitrust and competition laws protect competition by prohibiting anti-competitive behavior. LumiraDx personnel must comply with antitrust and competition laws. Even in countries where we operate that have not adopted antitrust and competition laws, we do not engage in any anti-competitive behavior that would harm LumiraDx's reputation.

Antitrust laws also forbid the abuse of market power, including conduct intended to exclude a competitor from a market.

Examples of conduct that can raise competition law concerns include:

- Agreements with competitors on prices, allocating customers, limiting output, or otherwise limiting competition.
- Agreeing with others not to use a particular product or deal with a particular company (often called a "group boycott").
- Agreements requiring a purchaser to resell a product at or above a particular price.
- Agreements with suppliers or customers that impose exclusivity obligations; and
- Requiring customers to purchase one product to get access to another product (also called "tying").

Human Trafficking and Slavery

LumiraDx does not engage in human trafficking or slavery in its workforce and requires that its employees take reasonable precautions to avoid buying from suppliers who engage in human trafficking or slavery. LumiraDx is an ethical manufacturer of medical devices and associated products. As part of our business operations, we maintain a list of approved vendors, only these approved vendors can be used by any part of our business. Before any vendor can be listed on the LumiraDx Approved Vendors List, the vendor shall be evaluated to ensure they meet LumiraDx's quality and ethical compliance requirements.

These include:

- Only selecting suppliers with a good business reputation
- Including language in every contract requiring suppliers to abide by all relevant local laws (which would include human trafficking and slavery laws), obtain annual certifications from suppliers.

Environmental Health and Safety

We promote and provide a safe, secure and healthy workplace as well as a clean environment

LumiraDx is committed to complying with environmental, health and safety (EHS) laws and regulations in the workplace and in the communities where we operate.

LumiraDx is committed to ensuring the health, safety, and security of the workplace in compliance with the applicable laws and regulations wherever we operate. LumiraDx personnel are expected to comply with and observe the prescribed personal protection equipment and safety rules. We encourage LumiraDx personnel to raise HSE related concerns and expect transparent reporting. Covering up incidents is considered a breach of this Code of Conduct.

Every LumiraDx employee is personally responsible for safety, security, health, and environmental protection at the workplace to the full extent required by his/her duties to the best of his/her knowledge, ability, and experience. We are all encouraged to identify areas for improvements and continuously work towards a better environment. As part of our commitments towards sustainable development we proactively seek to employ new, more sustainable technologies and processes to minimize our impact on the environment.

Political Activity and Donations

LumiraDx does not engage directly in party political activities, nor do we make any political contributions (either in cash or in kind).

Money Laundering

LumiraDx will always comply with anti-money laundering laws and regulations wherever we operate. Money laundering is the process of concealing the criminal origin of money or other property and making them look as though they are legitimate.

We will strive to minimize money laundering risks through our compliance measures which are designed to avoid receiving or being involved in an arrangement or transaction that relates to funds that may have a criminal origin.

8.0 Company assets

Intellectual property rights and confidentiality are key to our business

Intellectual Property

LumiraDx is dependent on intellectual property rights and their efficient protection to enhance the further discovery, development and delivery of innovative medical diagnostics and IT health services.

Whenever our intellectual property rights are violated, LumiraDx defends its rights. Violation of intellectual property rights does not only harm the assets of LumiraDx, but in many cases is also a threat to the health and safety of patients, e.g., counterfeit diagnostic products are illegal and pose a significant global public health problem. LumiraDx undertakes appropriate measures against counterfeits within the sphere of its influence.

LumiraDx is also committed to respecting the intellectual property rights of third parties. We expect that all employees take the intellectual property rights of third parties into due consideration in their daily work.

LumiraDx's practice is to consider patenting the inventions of its employees, regardless of whether the inventions are implemented in actual products. If you are involved in product development, you should contact the IP department regarding the patentability of your work. Be alert to possible infringement of LumiraDx's patents and bring any possible infringements directly to Legal.

Confidential Information

We respect and safeguard confidential information, including personal information.

One of LumiraDx's greatest assets is information about our products and services, including future product offerings. Never disclose confidential, operational, financial, trade secret, or other business information without verifying with your manager that such disclosure is appropriate. Typically, disclosure of this information is very limited, and the information may be shared with vendors, suppliers, or other third parties only after a non-disclosure agreement is in place. Even within LumiraDx, confidential information should be shared only on a need-to-know basis. The agreement respecting intellectual property you signed when you joined LumiraDx defines your duty to protect information.

Company Assets

It is the responsibility of everyone at LumiraDx to make sure that company assets are treated with due care and respect, not misused, or wasted. Company assets include property, proprietary information and intellectual property, business opportunities, company funds, company equipment and company time. Company assets should not be used for personal purposes without approval from your local management team.

Records Management

Accounting and financial records.

LumiraDx's accounting and financial records must:

- Record in an accurate, complete, and timely manner, in reasonable details, all assets, liabilities, revenues and expenses of the company.
- Appropriately reflect the company's transactions; and
- Conform to applicable accounting and financial reporting laws, rules, and regulations and LumiraDx's policies, procedures, and system of internal controls.

Falsifying records or misrepresenting facts can never be justified. LumiraDx does not tolerate any form of fraud.

Records retention

Unauthorized destruction of or tampering with any records (whether written or in electronic form) is prohibited, where LumiraDx is required by applicable law to maintain such records or where such records may be relevant to pending or threatened investigations or disputes.

9.0 Communications

Business communications

All business communications on behalf of LumiraDx should be lawful, truthful, professional and in good taste. The same standards apply to written and oral communication. Business communications include communications with customers, counterparties, brokers/dealers, intermediaries, fellow offices and third parties using mail, email, instant messaging, proprietary news IM systems (e.g., Bloomberg), fax, telex, and telephone.

Public communications

Communications with the public in respect of LumiraDx matters, such as making public statements or giving comments to the media, whether orally or in writing, should only be made by authorized personnel and through LumiraDx's PR/Communications Manager in accordance with the LumiraDx Corporate Communications Policies and Procedures.

All press and media inquiries should be referred immediately, without comment, to LumiraDx's PR/Communications Manager.

Communications with authorities

LumiraDx is committed to communicating with governmental and regulatory authorities wherever we operate in an open and transparent manner.

If you are contacted by someone from the police or a regulatory authority, a governmental department, or a law enforcement authority, you should refer to the General Counsel.

10.0 Non-compliance

We will consider non-compliance of the Code of Conduct as a serious matter warranting disciplinary action up to and including dismissal.

In some instances, non-compliance may result in a violation of the law, which can result in monetary fines for LumiraDx, or individuals involved as well as imprisonment.

If you become aware of any information that leads you to believe that this Code of Conduct has been breached, you should contact your line manager or HR.

11.0 Communication of Code

All current directors, officers and employees are supplied a copy of this Code of Conduct. Future directors, officers and employees will be supplied a copy of this Code of Conduct when beginning service at LumiraDx. All directors, officers and employees will be expected to review and sign an acknowledgment regarding this Code of Conduct on a periodic basis. Updates of this Code of Conduct, when adopted, will be promptly supplied to directors, officers, and employees. Directors, officers, and employees also can obtain a copy of this Code of Conduct by requesting one from the human resources department or by accessing our website at lumiradx.com/uk-en/code-of-conduct

12.0 Miscellaneous

If you have any questions about this Code of Conduct, please contact General Counsel.

No waiver of any provisions of this Code of Conduct for the benefit of a director or an executive officer (which includes, without limitation, LumiraDx's principal executive, financial and accounting officers) shall be effective unless (i) approved by the board of directors or, if permitted, the Audit Committee, and (ii) if required, the waiver is promptly disclosed to LumiraDx's securityholders in accordance with applicable U.S. securities laws and the rules and regulations of the exchange or system on which LumiraDx's shares are traded or quoted, as the case may be.

Any waivers of this Code of Conduct for other employees may be made by the General Counsel, the board of directors or, if permitted, the Audit Committee.

All amendments to this Code of Conduct must be approved by the board of directors and, if required, must be promptly disclosed to LumiraDx's securityholders in accordance with United States securities laws and Nasdaq rules and regulations.

Adopted September 25, 2021, subject to closing of the Company's merger with CA Healthcare Acquisition Corp.