



TANDEM
Diabetes Care

Code of Conduct

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We know through our engagement surveys that our values (People First, Team Up, No Shortcuts, Innovate Every Day, and Stay Awesome) resonate strongly with everyone at Tandem Diabetes Care and shape who we are as a company, but these phrases mean little without the actions to back them up.

This Code of Conduct offers a blueprint for maintaining the integrity required to live up to these concepts on a daily basis, providing guidelines to ensure we are holding ourselves accountable to our mission and values.

Trust is one of the most valuable assets our company has. Trust from our customers. Trust from our business partners and vendors. Trust from regulatory bodies, financial institutions, and shareholders. And trust in each other to always do the right thing. One careless act, intentional or unintentional, can quickly shatter our reputation and it can take years to get it back.

It is on all of us to live up to our values every day. By following this code, we can ensure that we maintain the trust required to sustain a successful business, allowing us to continue to fulfill our mission to make the lives of people with diabetes better and better, through relentless innovation and revolutionary customer experience.

Thank you for being a part of keeping Tandem the amazing organization it is and helping us all Stay Awesome for our customers and each other.



John F. Sheridan



Our mission and values

OUR MISSION: WHY WE EXIST

To make the lives of people with diabetes better and better through relentless innovation and revolutionary customer experience.



OUR VALUES: WORDS WE LIVE BY

We hold ourselves to the highest values of integrity, professionalism, and courtesy. We don't just say these words, we live by them so that we can create a positively different experience.

Innovate Every Day

We rely on new ideas, and people who keep their minds open to how to make them happen, to deliver products and experiences that can change people's lives. When faced with a revolutionary concept or simply a better way, we try to say yes (or at least maybe) before we say no.

No Shortcuts

Making things more efficient and cost-effective is great! Taking shortcuts is not. People's lives depend on us. Our partners trust us. So, we hold ourselves to the highest standards and deliver exceptional quality in everything we do. We do what it takes to get it right, and we're proud of it.

People First

Caring for the people who use our pumps is our top priority. We are fiercely loyal to them and the entire diabetes community. This starts with developing a deep understanding of their daily experiences, triumphs, and challenges. When making business decisions, we always ask ourselves and our partners, "How will this impact the people who count on us?"

Team Up

How we work as a team is as important as what we deliver. Transparency, honest communication, and partnering to solve problems are critical to our success. We bring people along to ensure we're all on the same path and create the space to respectfully challenge ideas.

Stay Awesome

We value and embrace every person at Tandem—their unique backgrounds, experiences, and perspectives. Here you can do great work and be yourself, flip flops and all. Through universal respect and genuine care, we trust one another to do what's best for all of us.



Our Code: How we stay awesome

Our Code is our guide for making decisions to keep our company positively different, doing what's right for our customers, our company, and each other.

OUR RESPONSIBILITY

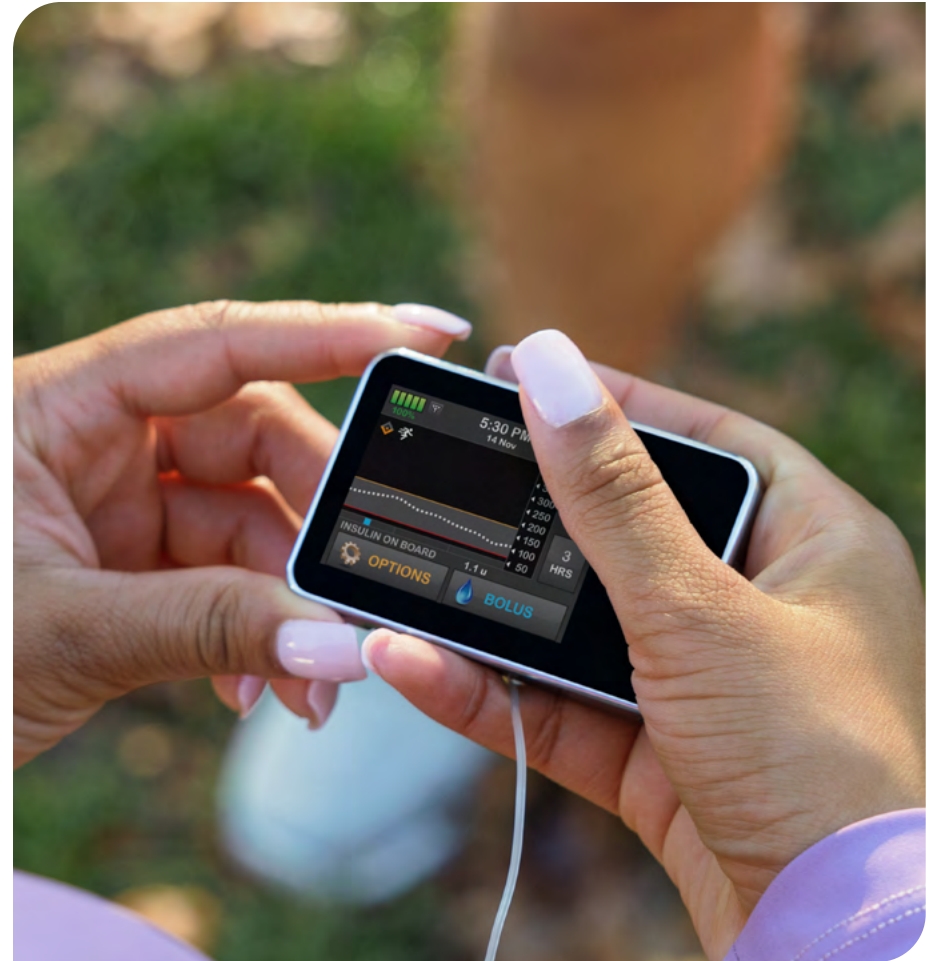
Our Code applies equally to everyone at Tandem, including our employees, officers, and Board of Directors. Regardless of role, title, or responsibility, we are all accountable for understanding and following our Code.

Our Code provides an overview of the laws, regulations, and company policies that support our core values and help us maintain the trust the diabetes community has placed in us. It is intended to complement other Tandem resources like our policies, procedures, and the employee handbook. It does not address every ethical issue or circumstance that may arise on the job. It is important that we all use good judgment in our actions and ask for help if we are unsure about what action to take.

To protect our customers and our business, we each have an obligation to report any misconduct or suspected misconduct, and to cooperate fully with any investigations if issues come up.

Tandem is committed to taking appropriate corrective action for employee misconduct. Failure to comply with our Code, company policies, or applicable laws may result in disciplinary action, up to and including termination of employment.

In rare cases it may be appropriate to request a waiver or amendment of a provision of our Code. To request a waiver, contact the Legal and Compliance team. A waiver must be in writing and may only be granted by the Board of Directors or the Nominating and Corporate Governance Committee.





How we stay awesome for our people

We prioritize mutual respect and a healthy, safe work environment. We are also committed to protecting privacy and personal information, avoiding conflicts of interest, and speaking up when we see any ethical concerns.



WE TREAT EACH OTHER WITH RESPECT

Through universal respect and genuine care, we trust one another to do what's best for all of us. Fostering a workplace where everyone feels supported and included helps us generate new ideas, drive innovation, and better understand our customers.

We are all at our best when we can be ourselves at work, and we are committed to creating and maintaining a safe, diverse, and inclusive work environment in which everyone can thrive.

By actively seeking different points of view and listening to others with courtesy and respect, we can all play a part in creating an environment free of discrimination, retaliation, and harassment.

WE MAINTAIN A HEALTHY AND SAFE WORK ENVIRONMENT

We are all responsible for helping to ensure our facilities are safe for employees and visitors, and that we follow all relevant environmental, health, and safety regulations. Our commitment to health and safety supports the success of individual employees and the company.

If you see any environmental, health, or safety risks, take action to help keep yourself and your coworkers injury free. Be alert to what is going on around you and speak up if you witness any threats or acts of violence, including the possession of weapons in the workplace. Working under the influence of alcohol, marijuana, or illegal drugs is also prohibited, and can impair your judgement, putting you and your coworkers at risk.



Learn More

- + [ADM-000095 Injury and Illness Prevention Program Procedure](#)
- + [ADM-000070 Drug and Alcohol Policy](#)



WE PROTECT PRIVACY AND PERSONAL INFORMATION

We respect the privacy of our employees, customers, coworkers, and partners. We are committed to protecting any personal information entrusted to us.

There are times when we need to collect, store, use, or share personal information to conduct our business. It is our responsibility to protect this information following local and international privacy and data protection laws. We are committed to upholding our promise to customers and employees to keep their personal information safe and to use it only for the specific purposes it was collected for.

Ways we do this include:

- + We only collect, share, and store the minimum amount of personal information necessary
- + We share personal details only for a legitimate purpose and take all appropriate measures to protect personal information from unauthorized use
- + We follow all applicable privacy rules and regulations wherever we operate around the world

What is personal information?

Personal information, also known as personally identifiable information (PII), is any information that can be used to identify someone, directly or indirectly.

Examples include:

- + General information such as name, date of birth, address, and email address
- + Financial information, including credit card and bank account numbers
- + Log-in credentials, including usernames and passwords
- + Government-issued identification numbers, such as passport number, driver's license number, or national identification number



Learn More

+ [ADM-0004275 Data Privacy Policy](#)



WE AVOID CONFLICTS OF INTEREST

A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do at Tandem. Even the appearance of a conflict can impact our reputation with our customers, shareholders, government regulators, and communities, so it is important to be able to identify these situations so they can be avoided completely, or disclosed and managed appropriately.

If you are considering engaging in a transaction or activity that could be considered a conflict of interest, you should disclose the matter to your supervisor or the Tandem Legal and Compliance team at compliance@tandemdiabetes.com right away so that appropriate approvals can be obtained first.

Common conflicts of interest

While it isn't possible to list every situation that could present a conflict, there are certain common situations where conflicts arise.

Situations that could create a conflict of interest include:

- + You do private consulting work that uses the same skills and background required in your role at Tandem
- + You have a second job or board position with a company that competes, does business, or wants to do business with Tandem
- + You have a substantial financial investment in a Tandem partner or competitor
- + You share an investment or property with a Tandem customer
- + You received a gift of more than a nominal value from a Tandem supplier, vendor, or customer
- + You've been invited to attend a concert, sporting event, or other entertainment activity by a Tandem supplier, vendor, or customer
- + Using a family member as a consultant



What if I'm approached to do consulting work for another company? Do I need to seek approval from Tandem before taking the position?

Yes. You should inform your manager and contact the Tandem Legal and Compliance team at compliance@tandemdiabetes.com to review the situation and receive guidance on whether you can accept the position. Sometimes, consulting projects can cause a conflict—we have to look at the type of company, the services it provides, and any impact it may have on your responsibilities at Tandem.

WE REPORT ETHICAL CONCERNS

We strive for an environment where everyone feels comfortable raising concerns.

How to determine if something is of concern

When faced with a situation where the right thing to do doesn't feel obvious, consider these questions:

- + Is it in line with the principles of our Code?
- + Is it in line with our mission and values?
- + Could it negatively impact the trust we've built with customers?
- + Is there someone at the company who could provide help or guidance?

Speak up and ask questions

In most cases, your manager should be your first point of contact. They are likely in the best position to understand your concern and take the appropriate action. But if you're not comfortable talking with your manager, you can also reach out to:

- + Your HR Business Partner (HRBP)
- + The Legal and Compliance team at compliance@tandemdiabetes.com
- + The Tandem Compliance Officer
- + The EthicsPoint confidential compliance and ethics hotline



EthicsPoint Confidential Compliance and Ethics Hotline

EthicsPoint provides a way to speak up if you're uncomfortable talking directly with someone. EthicsPoint is a confidential compliance and ethics line operated by an independent third party, NAVEX, where reports may be submitted anonymously.

Visit the [EthicsPoint website](#) or call 855-207-2917.

How reports are handled

We are committed to investigating all reported concerns quickly, thoroughly, and with the highest degree of confidentiality possible under the specific circumstances. Everyone is expected to cooperate fully with any investigation. If you elect to submit a report anonymously via EthicsPoint, you will be given a report key and a password to view the status of your report on the website. The Tandem Compliance Officer has full visibility into all ethics complaints submitted.

WE DO NOT TOLERATE RETALIATION

We value employee input, and everyone should feel comfortable raising concerns without fear. Engaging in any form of retaliation against an employee who has raised a concern in good faith, or who is participating in an investigation, will result in disciplinary action, up to and including termination of employment.

You won't get in trouble for reporting a concern in good faith or for providing information related to a reported concern.



Manager Spotlight

As people managers, you have an even greater responsibility in creating an environment where employees feel safe sharing ideas and concerns. What should you do if an employee speaks up?

- + Listen actively and with empathy. Don't take sides or make judgments about what the employee tells you.
- + Gather the facts from the employee speaking up to you
- + Thank the employee for speaking up
- + Remind the employee of our no retaliation policy
- + Contact Human Resources, Legal, or Compliance to communicate what has been reported to you



Learn More

- + [ADM-000074 Employee Handbook](#)



How we stay awesome for our customers

Helping improve the lives of our customers is at the core of our mission and drives everything we do. Our customers include:

- + People using our pumps and their support network and caregivers
- + Healthcare providers prescribing and/or training on our pumps, including physicians, nurses, fellows, residents, and researchers, as well as benefits managers and other decision makers in a healthcare system

WE COMMUNICATE CAREFULLY ABOUT OUR PRODUCTS AND SERVICES

Diabetes is a complex condition, and our customers must have accurate information to make the best therapeutic decisions for their individual needs. We communicate about our products in a way that's truthful, accurate, and not misleading. We also avoid any off-label promotion of our products, or pre-promotion of unapproved devices. In doing this, we uphold our reputation and continue to build trust and confidence in our products and services.

These efforts include:

- + Only promoting our products and services for their approved uses
- + Ensuring all promotional emails to customers originate from Tandem corporate
- + Only using promotional materials approved by the appropriate Tandem departments
- + Ensuring labeling, training, and promotional materials meet all regulatory requirements



Learn More

- + [ADM-0010152 Patient Interactions Policy](#)
- + [ADM-000047 Interactions with Health Care Professionals Policy](#)



What is off-label promotion?

Off-label promotion is the advertising or encouragement of use of a product that has not been approved or cleared by the FDA. For example, telling a customer or healthcare professional that our device is safe to use with someone younger than the approved age indication.

WE ENSURE PRODUCT QUALITY AND SAFETY

We strive for total customer satisfaction by delivering on their quality expectations, complying with and maintaining an effective quality management system, and through continuous improvement in all processes throughout our organization. We use this same rigorous standard when evaluating any potential supplier.

If you are made aware of any adverse events or customer complaints, or have any other concerns related to quality or safety related to our products or services, immediately report them to techsupport@tandemdiabetes.com.



What is considered a customer product complaint?

A product complaint is any written, electronic, or oral communication that alleges deficiencies related to the identity, quality, durability, reliability, safety, effectiveness, or performance of a Tandem device currently on the market.



WE PROTECT CUSTOMER PRIVACY

Our customers place an incredible amount of trust in us, which is a privilege we take very seriously. We respect and protect the personal information of all of our potential, current, and former customers by following the guidelines highlighted in this Code of Conduct, and immediately reporting any concerns we have about a potential issue.

If you have a concern that personal information has been intentionally or unintentionally shared or misused, please complete the [Privacy Incident Reporting Form](#). You may also contact the Privacy Team at privacy@tandemdiabetes.com at any time to discuss privacy concerns.

Ways to help keep customer information safe:

Any time you are about to share a customer's personal information, take a second to ask yourself the following questions:

- + Should I be sending this information to this person? (Is it their doctor? A fellow employee with a legitimate need for that information?)
- + Is ALL of the information I am about to share necessary for the recipient to do their job?
- + Have I double checked the recipient's information? (Did I type the email address correctly? Is this the current and correct mailing address?)

Taking that one extra second can maintain our customers' trust and prevent serious and costly outcomes.



What is Protected Health Information (PHI)?

PHI is any information about health status, provision of health care, or payment for health care that can be linked to a specific individual. This includes any health-related information, such as diagnosis details, medical device information, medical records, lab reports, images, and other information that Tandem collects, uses, or discloses to fulfill our obligations to our customer.



Learn More

- + [ADM-000042 Acceptable Use Policy](#)
- + [ADM-0004275 Data Privacy Policy](#)

WE ARE TRANSPARENT IN OUR INTERACTIONS WITH HEALTHCARE PROVIDERS

We are required to track and disclose certain payments and transfers of value made by Tandem to healthcare professionals and healthcare organizations, which provides visibility to our ethical interactions and relationships with healthcare providers.

It is important to accurately report any expenses involving healthcare professionals. This means we submit detailed receipts in a timely manner and identify all individuals in attendance. Remember we have limits in place for meals with healthcare providers, and corporate credit cards should be used whenever possible.

We do not offer anything of value to our healthcare providers or customers to get them to use Tandem products. The penalties for violating Anti-Kickback laws can be severe. It is important that we follow all internal policies and procedures on interacting with our HCPs and that we document our interactions accurately and transparently.



WE PROHIBIT BRIBERY AND CORRUPTION

The trust of our customers, as well as our partners and shareholders, is critical to our business. To maintain this trust, we do not do business with anyone who undertakes corrupt business practices, and we don't offer or accept anything of value to improperly influence or gain an unfair advantage.

In some countries, healthcare professionals can be considered government officials if the healthcare system is government run. Other examples of government officials include government employees, someone acting on behalf of a government, an employee of a state-owned hospital, a public international organization like the World Health Organization, or elected officials or candidates. We do not bribe government officials or employees to win business or influence an act or decision and must avoid any action that could be perceived as a bribe.

Examples of items that could be considered a bribe include:

- + Gifts, meals, travel, or entertainment
- + Employment or consulting opportunities
- + Donations, sponsorships, or grants
- + Free products or special discounts
- + Cash and cash equivalents



An inspector said they would move up a timeline if we gave his nephew a free pump. He says his nephew really needs it and it would be good for us too. Is this OK?

No, a bribe is never OK. If someone ever offers or requests a bribe, contact the compliance officer and the legal department immediately.



Learn More

- + [ADM-000047 Interactions with Health Care Professionals Policy](#)

WE COMPETE FAIRLY FOR BUSINESS

Part of our commitment to the diabetes community and our customers is to compete for business fairly and ethically. Fair competition in the market ultimately results in more innovation, greater choice, and higher quality products for people with diabetes. By continuing to innovate and provide products and services that customers love, we will continue to set ourselves apart from our competitors.

What are antitrust and fair competition laws?

These laws, which vary by geography, are designed to maintain free and open competition. They determine how we can compete and interact with other companies, and generally address things like pricing practices (including predatory pricing, price fixing, and price discrimination), exclusive dealerships or distributorships, discounting, and collusion among competitors.

What we can do:

- + Deal fairly and honestly with customers, healthcare providers, employees, and anyone else you have contact with while performing your duties
- + Protect our confidential information, which may include pricing, contract terms, or business strategies
- + Don't illicitly seek out proprietary information, trade secrets, or other confidential information from employees of our competitors

- + Don't make false or misleading claims about Tandem or our competitors
- + Follow both the letter and spirit of antitrust, consumer protection, and fair competition laws wherever we do business around the world

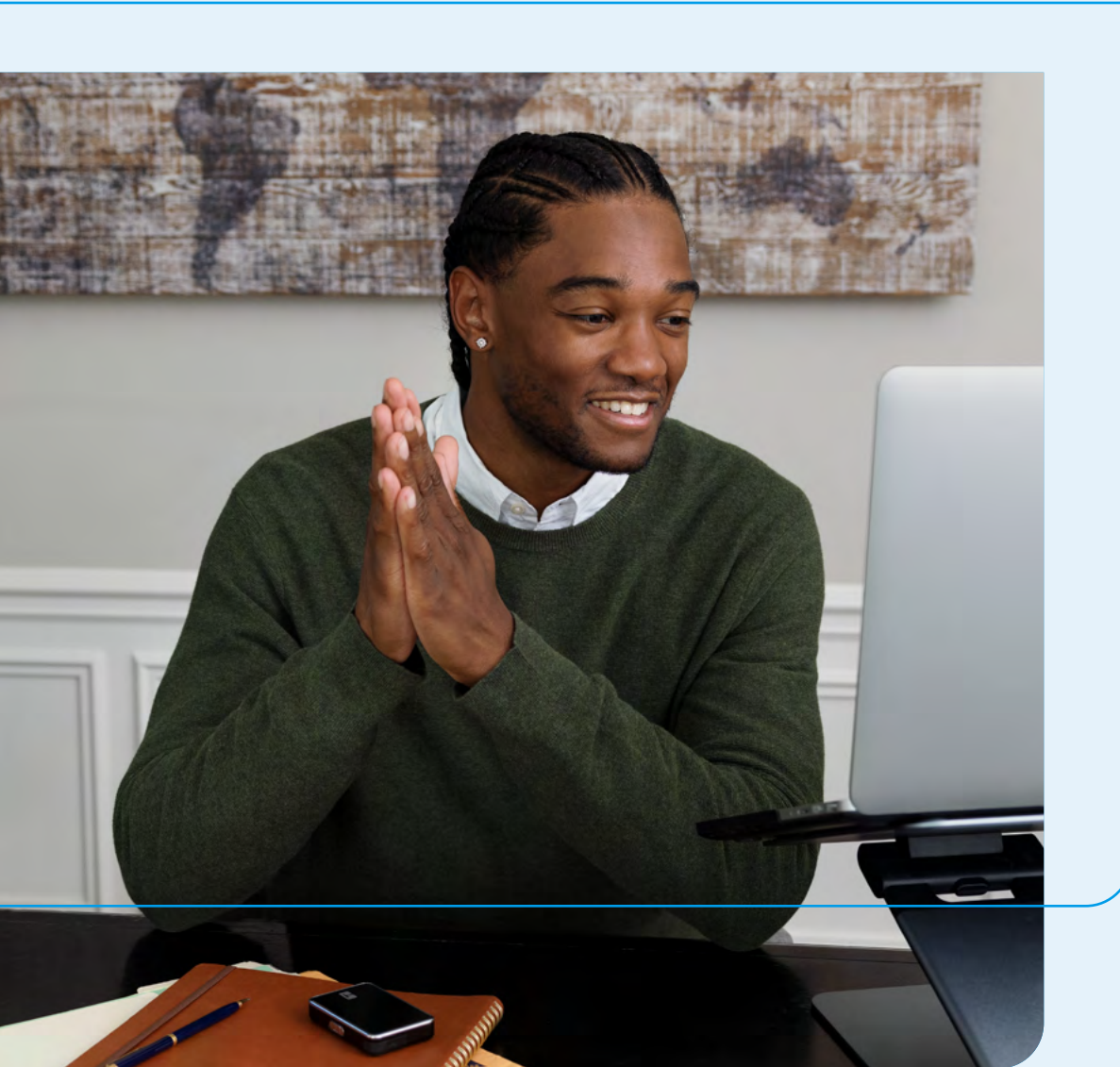


WE COMPLY WITH INTERNATIONAL TRADE LAWS

As a global company, it is critical that we adhere to international trade laws, including those related to import and export controls and trade sanctions. Following these laws allows us to maintain our integrity and deliver our products in a timely manner to help improve the lives of people with diabetes around the world.

If you are involved in the movement of products, services, information, or technology across borders, ensure that you accurately classify and report the value, quantity, and country of origin for all imports and exports. Make sure that you are always following our standards and external regulations related to import, export, and distribution.





How we stay awesome for our company and shareholders

It is critical to our business that we protect our company's reputation, assets, and trade secrets, so that we can continue to innovate and deliver on our mission to help improve the lives of people with diabetes.



WE PROTECT CONFIDENTIAL INFORMATION AND TRADE SECRETS

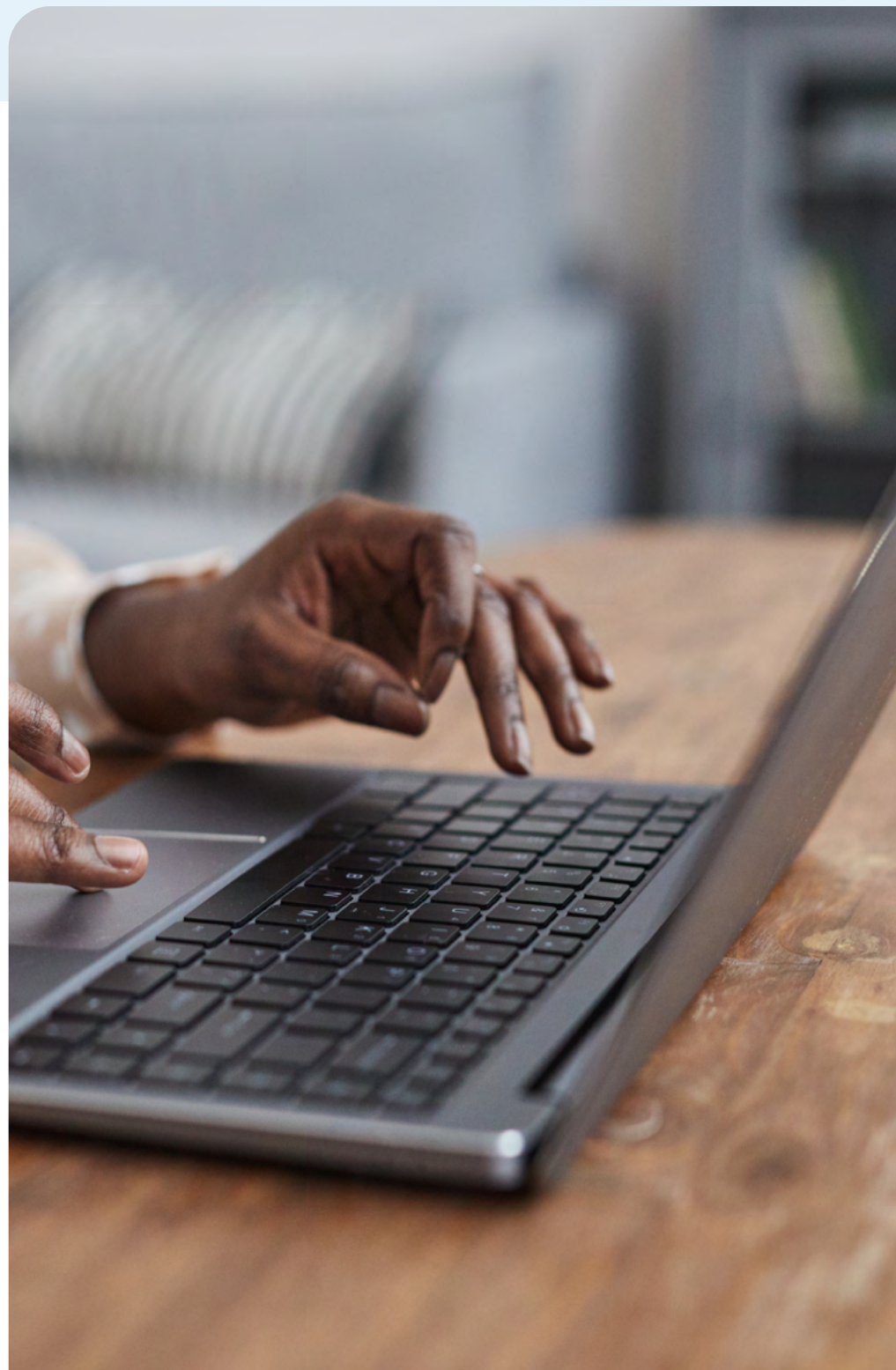
We depend on confidential information and trade secrets to maintain our competitive advantage and ensure that we can continue to further our mission to improve the lives of people with diabetes. We are all responsible for protecting confidential information from disclosure or misuse to ensure we continue to drive innovation and achieve our business goals.

What is confidential information?

Confidential information includes any non-public information that might be useful to competitors or harmful to our customers, employees, or our company if disclosed. This includes information in spoken, printed, electronic, or other formats.

Examples include:

- + Proprietary information, such as device designs and manufacturing processes
- + New product information and marketing plans
- + Customer, distributor, and employee lists
- + Non-public financial information, such as pricing, projections, and sales data
- + Trade secrets and other intellectual property
- + Potential mergers, acquisitions, and investments
- + Patents and patent applications



Confidential information includes all non-public information that, if disclosed, might be useful to competitors or harmful to the company or its customers. It also includes information that suppliers and customers have entrusted to us.

You are prohibited from sharing confidential information with anyone outside the company unless it is permissible under company policies, the appropriate agreements are in place, and the Legal team has been consulted. You should only share confidential information with fellow employees who have a legitimate need for access. You should not transfer confidential information to an external device, a personal cloud storage server, or a personal email address without approval of a supervisor.

You should also avoid discussing confidential information in public places such as elevators, public transportation, restaurants, and social media. And most importantly, speak up when you have concerns about breaches of confidential information.

Nothing in this Code prevents anyone from reporting illegal workplace conduct to or cooperating with government or law-enforcement agencies, as allowed by law. Any agreement that conflicts with this is automatically modified to comply. Please see 18 U.S. Code § 1514A and this Code's back page for more information.

Best practices for protecting confidential information:

- + Follow Tandem password security procedures and don't share passwords for Tandem networks or devices
- + Secure documents, data, and devices when not in use, including personal mobile devices used to conduct Tandem business
- + Limit confidential information to individuals who have authorized access
- + Do not download Tandem files on external devices or drives without authorization from your supervisor
- + Indicate that documents contain confidential information when appropriate, through watermarks, document headers and footers, and email copy



Learn More

- + [ADM-000074 Employee Handbook](#)
- + [ADMF-000017 Confidentiality and Proprietary Rights Agreement](#)
- + [ADM-0004667 Password Security Procedure](#)

WE SECURE COMPANY ASSETS

Our assets include everything our company owns or uses to conduct business. These assets include the physical, electronic, and informational items we use every day to do our work and deliver innovative products and services to our customers. We are all responsible for being proactive about safeguarding our assets from loss, damage, theft, waste, and improper use.

Examples of company assets:

- + Computer equipment, facilities, products, and materials
- + Information and data
- + Money, investments, loans, and deposits
- + Ideas, intellectual property, designs, and trade secrets

How we protect our assets:

- + Treat Tandem assets with care and avoid waste, damage, and loss
- + Responsibly manage Tandem funds and resources
- + Be alert to phishing scams or other attempts to uncover sensitive information
- + Follow security protocols when allowing visitors into Tandem facilities
- + Be familiar with all procedures that relate to protection of company assets
- + Speak up when you have concerns about the misuse of company assets



What do I do if my mobile device or laptop is lost or stolen?

Immediately contact the IT Service Desk and report any lost or stolen devices that connect to Tandem systems and/or are used to conduct Tandem business. Lost or stolen devices are one of the easiest ways for bad actors to compromise our systems and data.



Learn More

- + [ADM-0004701 Physical and Environmental Security Procedure](#)
- + [ADM-0009567 Information Security Management System Training and Awareness Policy](#)

WE MAINTAIN ACCURATE RECORDS

We keep accurate and complete records so we can make responsible business decisions, meet financial and regulatory obligations, and maintain the confidence of our customers, shareholders, and other stakeholders.

As a public company, we are required by securities laws to maintain accurate records. Proper recordkeeping and oversight allow us to maintain a reputation based on reliability and trust.

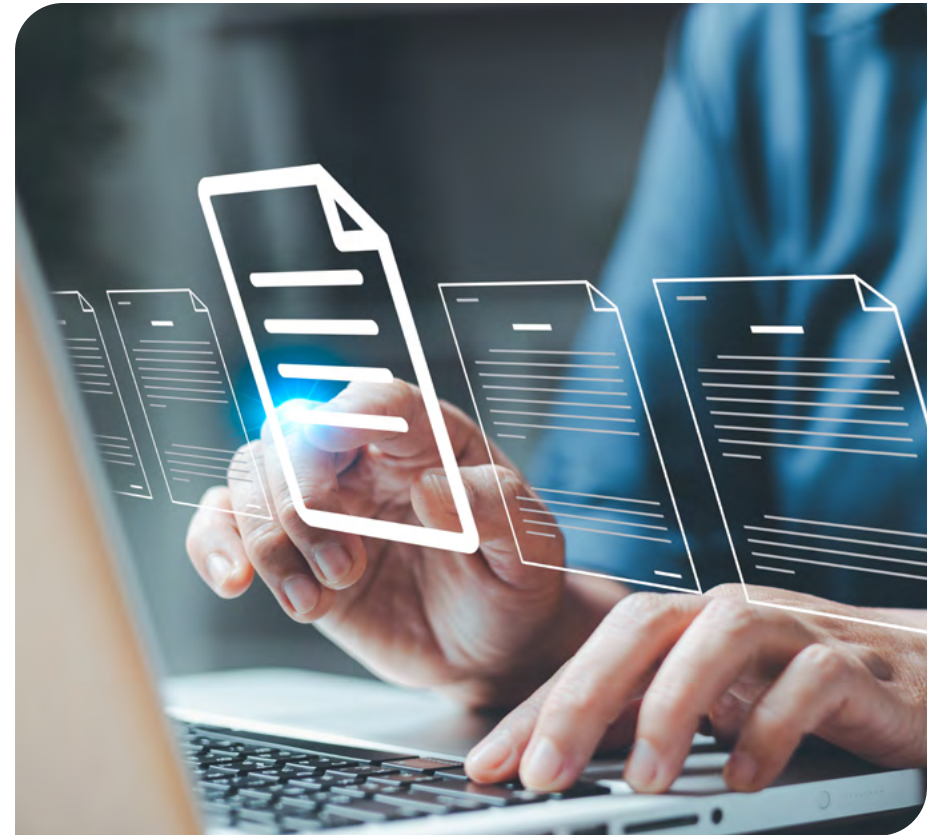
To do this we:

- + Follow our financial standards and external regulations wherever we operate around the world
- + Record business transactions accurately, transparently, and in a timely manner
- + Maintain clear and accessible records of financial transactions
- + Provide complete, fair, timely, and understandable disclosures in public communications and documents submitted to regulators

Records retention is critical

Our records include electronic and paper documents and information that contain company information, including contracts, purchase orders, expense reports, marketing materials, and policies. Records also include internal communications, such as emails, voicemails, and meeting recordings.

Records should be retained according to our document retention and destruction policy.



Learn More

- + [ADM-000048 Financial Policy](#)
- + [ADM-0013955 Information Retention and Destruction Policy](#)

How we stay awesome for our company and shareholders



WE PROHIBIT INSIDER TRADING

As a Tandem employee, you may have access to information that hasn't been made public ("material non-public information" or MNPI). Using confidential or non-public information for personal gain or to benefit someone else is unfair, creates an uneven playing field for investors, and erodes the trust of our customers and shareholders.

The purchase or sale of company stock or other securities while possessing material non-public information or the disclosure of inside information ("tipping") to others who may trade in such stock or securities is referred to as "insider trading" and is prohibited by federal and state securities laws. The penalties for violating insider trading laws are significant and the laws are extensive.

Examples of potential material information

Material information is anything a reasonable investor would find important enough to make a decision to buy, hold, or sell stock.

If information has not been widely disclosed to the general public through press releases or filings with the Securities and Exchange Commission (SEC), it should be considered non-public and confidential.

Examples include:

- + Financial results, projections, and forecasts
- + Product approvals and launches
- + Regulatory, legal, or compliance inquiries and investigations
- + Planned mergers and acquisitions
- + Market strategies



What if I'm not sure if I have insider information?

Always be cautious when discussing Tandem business and reach out to preclearance@tandemdiabetes.com with any questions or concerns regarding insider trading.



Learn More

+ [ADM-0003488 Insider Trading Policy](#)

WE COMPLY WITH THE LAW

Not following applicable laws, rules, and regulations can carry heavy penalties and may pose a serious risk to our business and to our customers. It is a privilege to work within health care and we recognize the responsibility we have to the communities we serve.

As a Tandem employee, it is critical that you know and understand the legal and regulatory requirements that apply to Tandem for your specific area of responsibility. While you are not expected to have complete mastery of the legal requirements, it is expected that you be able to recognize situations that could potentially violate these requirements and contact your supervisor or the Legal team.

We conduct our business and perform our job duties in compliance with all applicable laws, rules, and regulations of the jurisdictions in which we operate. The fact that in some countries certain laws are not enforced or that violation of those laws is not subject to public criticism is never an excuse for noncompliance.

If compliance with the law should ever conflict with this Code, you should comply with the applicable law and speak to your supervisor immediately.

A sample list of some of the laws, rules, and regulations that apply to Tandem can be found in the Resources section at the end of this Code of Conduct.



WE SAFEGUARD OUR REPUTATION

We have worked hard over the years to build and maintain a reputation of trust and integrity with our customers, partners, regulators, shareholders, and the media. It is critical that the information we provide is complete, truthful, fair, and accurate. To help ensure this, only authorized employees should be communicating company information to the press, investors, or on social media.



I was contacted by a journalist asking questions about a recent announcement. What do I do?

Never respond to any media inquiries on behalf of Tandem. Please ask them for their name, contact information, and specific questions, and forward the request to our Media Relations team at media@tandemdiabetes.com.



Interacting on social media

Social media is a powerful tool that can both help and harm a company. As a Tandem employee, it is important to be aware that some of your interactions could be seen as company statements and not just your personal opinions.

For example, a Tandem employee liking a customer's post about their experience with the product could be viewed as an endorsement of that content by the company, which could be a big problem if the customer has mentioned anything considered off-label use of the product.

We must be careful how we use social media to post content, interact with customers (including "liking" content, private messages, or public posts/reactions), and share content from Tandem or other people and companies.



What Tandem content is OK for me to post on social media?

You are welcome to share anything Tandem has already posted on social media, as long as you don't add additional details in your post that go beyond the details shared by the company. You may have information at your disposal about that topic that we have not made public.

Other content that is OK to share includes:

- + Content that has been pre-written by a Tandem Social Media Representative specifically for employees to post, likely provided via internal email or the intranet
- + Content you've submitted and that has been pre-approved by a Tandem Social Media Representative



Learn More

+ [ADM-000073 Social Media Policy](#)



How we stay awesome for our communities

We are committed to understanding and minimizing our environmental impact, engaging with our communities, and sourcing responsibly to ensure our partners uphold the same standards to which we hold ourselves accountable.

WE PROMOTE CORPORATE RESPONSIBILITY

We have a focused effort on understanding the environmental impact of our business, both the direct impact as an employer and manufacturer, as well as the impact on people using the products we offer.

Product-related efforts

- + All of our products are rechargeable, keeping millions of disposable batteries out of our landfills every year
- + The software on our pumps can be updated remotely by customers, allowing us to bring new features to our users without shipping new hardware
- + Our pump refurbishment program allows us to reuse key components of returned products to help reduce electronic waste

Community outreach and impact

Our capacity to do good extends beyond our daily work. We seek opportunities to invest in and support our communities, while also helping to address broader challenges in health care. To this end, we work with a wide range of people and organizations, from local to international, to help provide peer support and education in the diabetes community.



Learn More

+ [ADM-000092 Purchasing Policy](#)

Protecting human rights with responsible sourcing

Treating people with dignity and respect is core to doing what's right. To do this, we conduct our business in a manner that respects the rights and dignity of all people and expect our business partners to do the same. We source from reputable third parties that share our commitment to protecting workers and communities, and our supplier agreements warrant that products sold to us comply with all applicable anti-slavery and human trafficking laws and regulations. If we suspect a supplier hasn't complied with applicable regulations, we develop a strategy for resolution and will terminate any business relationship if our standards are not upheld.





Conclusion

As Tandem employees, each of us has a responsibility to act ethically, follow the Code, policies, and laws, and speak up if something doesn't seem right. We have an obligation to protect the health and safety of each other, to work together to protect the interests of the company, and to always ensure that we do what is right for people living with diabetes.



Remember this Code is not the sole source of information. Contacts are listed below and policies can be found on Agile. When in doubt, reach out!

Laws That Impact our Business

Listed below is a sample of just some of the laws, rules, and regulations that apply to Tandem.

Healthcare Laws

Regulate how we talk about our products and the information we are allowed to provide about our products, how we interact with customers and healthcare professionals, and how we handle and protect private information. Some examples are:

- + The Anti-Kickback Statute
- + False Claims Act
- + Food, Drug and Cosmetic Act
- + The Federal Trade Commission
- + Centers for Medicare and Medicaid Services

Trade Laws

Regulate how we do business globally and who we may do business with. Some examples are:

- + The Foreign Corrupt Practices Act
- + U.S. Embargoes
- + U.S. Export Controls
- + Antiboycott regulations
- + UK Bribery Act

Data Privacy Laws

Regulate how we collect, use, and disclose personal information that we maintain.

- + Health Insurance Portability and Accountability Act (HIPAA)
- + California Privacy Rights Act (CPRA)
- + Children's Online Privacy Protection Act (COPPA)
- + General Data Protection Regulation (GDPR)
- + Personal Information Protection and Electronic Documents Act (PIPEDA)
- + Various state and local privacy regulations

Policies

- + HR
 - ADM-000074 Employee Handbook
- + Patient and provider interactions
 - ADM-000047 Interactions with Health Care Professionals Policy
 - ADM-0010152 Patient Interactions Policy
- + Other applicable policies
 - ADM-000042 Acceptable Use Policy
 - ADM-000073 Social Media Policy
 - ADM-0009567 Information Security Management System Training and Awareness Policy
 - ADM-0004667 Password Security Procedure
 - ADM-0004701 Physical and Environmental Security Procedure
 - ADM-0004275 Data Privacy Policy

- ADM-0010617 Hybrid and Remote Workforce Policy
- ADM-0011524 IT Security Remote Working Policy
- + Business policies
 - ADM-0003488 Insider Trading Policy
 - ADM- 000048 Financial Policy
 - ADMF-000017 Confidentiality and Proprietary Rights Agreement
 - ADM-0013955 Document Retention and Destruction Policy

Contacts

- + Legal and Compliance team
 - Email: Compliance@tandemdiabetes.com
- + EthicsPoint Confidential Ethics Hotline (operated by NAVEX)
 - Online: [EthicsPoint Website](#)
 - Phone: 855-207-2917
- + Privacy Team
 - Email: Privacy@tandemdiabetes.com
 - Online: [Privacy Incident Reporting Form](#)
 - Phone: 858-224-6484
- + Human Resources
 - Email: HRSupport@tandemdiabetes.com
 - Online: [HR Support Portal](#)



Nothing contained in this Code limits or otherwise prohibits any individual (including any current or former employee) from discussing or disclosing information about unlawful acts in the workplace, such as harassment, discrimination, retaliation, or any other conduct that you have reason to believe is unlawful, or communicating with, filing a charge or complaint with, or otherwise participating in any investigation or proceeding with any U.S. federal, state or local governmental or law enforcement branch, agency, entity, or commission, including providing documents or other information, without notice to Tandem, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or otherwise. Any agreement (including without limitation any confidentiality agreement, nondisclosure agreement, employment agreement, separation agreement or similar employment or compensation arrangement) in conflict with the foregoing is hereby deemed amended by Tandem to be consistent with the foregoing.

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