

Insulet is committed to fostering a sustainable business to support the well-being of our customers, employees, and communities. We are dedicated to improving the lives of people with diabetes through the use of our Omnipod product platform. We strive to provide engaging and rewarding work for our employees, and to always demonstrate integrity in our actions. We are committed to being a good corporate citizen and giving back to the communities in which we live and work. We believe that delivering long-term value for our stakeholders is critical to our success.



Mission and Impact

Our Mission

We are driven by our mission to enable our customers to enjoy simplicity, freedom, and healthier lives through innovative technology.

Diabetes is a global epidemic. Insulet's goal is to make diabetes a smaller and more manageable part of people's lives through our Pod therapy: a simple, smart, and discreet way to control insulin. **We're changing Podders' lives for the better.**

We are achieving this through our industry-leading, customer focused R&D, our groundbreaking business model that prioritizes customer access, and our commitment to operational excellence and safe, high-quality products.

Our Impact

Our Podders choose the Omnipod® Insulin Management System because they trust us to help them manage their diabetes so that they can live their lives to the fullest. Omnipod provides intuitive simplicity and ease of use, freedom and control to live one's life without restriction, and discretion to fit different lifestyles. We offer a product that meets our customers' needs, no matter what stage of life they are in.

When a child has diabetes, it is a stressful time for everyone in the family. Caregivers want to choose an insulin delivery method that both addresses a child's evolving health needs, while also granting him or her the freedom to be a normal kid. The Omnipod Insulin Management System was created for this very reason – to manage diabetes with as few disruptions to daily life as possible and to provide unprecedented simplicity, ease of use, and freedom.

Everything we do is with our customers in mind. Our small, tubeless, waterproof¹ Pod delivers insulin all day for up to three days, and replaces the stress and inconvenience of administering up to 14 daily injections over that same time period. Since our Pod is waterproof and attached directly onto the skin, it provides high-quality adherence and continuous insulin delivery, without the need to disconnect when showering, swimming, working out, and playing sports.

One of our Podders, Lexi Bentinganan, was diagnosed with diabetes in 2013 at the age of 8. She is now 15 years old and speaks about how Omnipod has helped her live a stress-free life: “I have been living with Type 1 diabetes since I was eight years old. I have always loved to swim and used to struggle with finding a way to do what I love while also managing my blood glucose levels. Now that I use the Omnipod System, I can swim every day because it is tubeless and waterproof. My Omnipod gives me the freedom to do what I love, without the stress of managing my blood sugar levels.”

In addition to the waterproof nature of the Pod, it can be attached almost anywhere on the body that an individual can receive an injection, keeping it convenient and out of sight.

Katie Rokes, a Podder since 2015, speaks about how Omnipod has dissipated the anxiety of being diagnosed with Type 1 diabetes as a teenager. “All that independence I thought I had gained as I entered my teenage years was gone in an instant, replaced by my mother’s constant worry. With the help of the Omnipod VIEW® app, my mom can monitor my insulin levels even when I am out on my own. Now, I am back to babysitting, heading out for pizza with friends, and playing one or two soccer games a day. The best part is that the Pod isn’t even noticeable. I tried my first demo Pod at a lake. None of my friends even noticed.”

Product Quality

We are focused on developing innovative products that reduce the work it takes to manage diabetes. To deliver that, we know we must ensure product quality, safety and simplicity for our users.

Our Quality Policy starts and ends with customer safety. We are dedicated to rigorous compliance with all laws and regulations regarding quality, safety, and performance requirements in every country where we offer our products. We set high standards and focus on achieving continuous improvement in the effectiveness of our quality processes.

Our VP of Quality Systems and Operations, a position that reports to the Executive Vice President and Chief Operating Officer, is in charge of quality and safety. Ultimate quality management oversight lies with our Board of Directors, which receives regular updates on our quality procedures and performance.

Our quality management system guides our processes. All of our manufacturing facilities are International Organization for Standardization (ISO) 13485 and U.S. Food and Drug Administration (FDA) CFR820 certified, following the quality management system standards for medical devices. Similarly, we require our contract manufacturers to be ISO 13485 and FDA CFR820 certified.

¹ The Pod has a waterproof IP28 rating for up to 25 feet for 60 minutes. The PDM is not waterproof.

100% ISO 13485 certified
for all of our manufacturing facilities and
contract manufacturing facilities

We have received approval of our Quality Management System from the BSI Group London, U.K., an accredited Notified Body for CE Marking and the ISO.

We proactively conduct regular product risk assessments using multiple methods, including adherence to the ISO 14971 standard for risk management of medical devices. We provide regular employee training on product safety: all new employees must complete our R.I.T.E. (Respect, Integrity, Teamwork, and Excellence) Start program that includes a session on quality and regulatory safety requirements, and employees receive regular follow-up training based on their roles. There are regular internal and external product safety audits, including in 2019 two external (non-regulatory) third-party assessments and regulatory audits from Health Canada and ANSM (French National Agency for Medicines and Health Products Safety).

We have set stringent product quality targets that we monitor for conformance and investigate any incidents. Our targets include customer service targets for continuity of supply, and targets for manufacturing process and released product quality. We monitor performance through monthly cross-functional senior leadership meetings on trends and data in product performance and safety. If we identify a manufacturing defect, we give immediate feedback to the facility to correct the issue. As part of our quality management system, we have developed and maintain a dedicated Corrective and Preventive Action (CAPA) program, which states the incident investigation and corrective action procedures in the event of a product safety complaint or event. Further, we are committed to public reporting on product issues.

Clinical Trial Standards

We have established a series of policies and procedures that govern the ethics of how we conduct clinical trials. We adhere to Good Clinical Practice (GCP)², as well as country-specific regulations, for designing and conducting clinical studies, and reporting of study results to ensure accuracy and credibility of the data. These procedures ensure the rights and confidentiality of trial subjects are protected. We have regular discussions with the FDA and other regulatory bodies to align on trial design to ensure robust testing of the safety and efficacy of our products. Prior to execution, our protocols are reviewed and approved by the FDA.

Our Medical Director has responsibility for the ethical conduct of our trials. Additionally, we have an Independent Review Board (IRB), which independently monitors our ethics and has oversight and authority to approve, modify, or stop trials. The IRB serves an important role in protecting the rights and welfare of research subjects. We have a policy to publish trial results as quickly as possible in peer-reviewed scientific journals and conferences once data is available.

² GCP is an international ethical and scientific quality standard for conducting clinical trials.

No Animal Testing

We do not conduct any testing on animals or outsource testing on animals, and we have no plans to do so.

Product Accessibility

Insulet operates at the intersection of medical and consumer technology with a focus on reducing the burdens and day-to-day complexity for those living with diabetes. Ensuring customers have access to our products is a key priority.

In the United States, our pricing strategy is to encourage the affordability of our products for those people who can benefit from their use, while ensuring Insulet is able to continue to reinvest and support business operations. In the markets outside of the United States where we currently operate, the majority of our customers receive their healthcare funding from the government. In those markets, we work within the confines of the established frameworks already developed (tenders, national reimbursement for fee-for-service, etc.) and focus on the value proposition of our product line to develop pricing levels which are commensurate with the product benefits and align to the existing frameworks.

When setting prices, we focus on how we can be fair and affordable to people who can benefit from our products. We consider stakeholder (customer, healthcare provider, payor, partner, and advocacy) engagement and input, payor analysis, predicate technologies and value dossier output, as well as Health Economics & Outcomes research that quantifies improvements to diabetic population health and reduction in costs. In the United States, prices are based at a fair market price. Some of the factors that determine the fair market price are costs of goods sold, consumer and payor marketing surveys, and payor and patient value of improvements to health economics outcomes. If a price increase is to occur, it typically tracks the Consumer Price Index (CPI) for Medical Care. The medical care index is one of eight major groups in the CPI and is most appropriate for informing price increases for Omnipod since this index tracks medical care commodities such as medicinal drugs, medical equipment, and supplies.

In addition to product innovation, we consider innovation in identifying new ways to increase product accessibility to customers. For example, we worked with the Centers for Medicare & Medicaid Services (CMS) to secure Medicare coverage for Omnipod. In 2018, CMS issued guidance clarifying that Medicare Part D Plan Sponsors may provide coverage for products such as the Omnipod System under the Medicare Part D (prescription drug) program. This coverage also provided a direct pathway to secure broad Medicaid coverage. This expanded coverage increased the number of locations where an Omnipod user can obtain the product from a handful of specialty pharmacies to tens of thousands of retail pharmacy locations. By making this change, many more people have gained access to Omnipod.

We also want to help those who may have difficulty affording the Omnipod System. Insulet offers a financial assistance program (FAP) that provides support to U.S. residents who use the Omnipod Insulin Management System and meet specific eligibility criteria and income guidelines. The FAP covers Podders who are uninsured, have insurance that does not cover the Omnipod System or one of its individual components, or cannot afford their insurance out-of-pocket obligations.

Due to the Coronavirus pandemic, we expanded our FAP for our current U.S. Podders who have been negatively impacted by COVID-19. Upon meeting certain financial criteria, a current Podder may receive

up to a six-month supply of products (60 Pods) free of charge through December 31, 2020. The program addresses the unique healthcare affordability challenges in the United States. Current U.S. customers are asked to call the Insulet Customer Care team at 1 (800) 591-3455 and select Option 2 for assistance.

Employees

We know that our people are the source of our innovation and our success. We strive to attract and retain the best talent with competitive compensation and benefits, opportunities for professional growth and development, and a culture that emphasizes fair and equitable treatment.

Attracting, retaining, and engaging talent

Insulet has a noble mission that attracts top talent. We are focused on recruiting and motivating employees to drive our strengths at the intersection of medical and consumer technology. Benefits vary by country with full-time employees eligible for benefits including health care, retirement plans, maternity/paternity leave, and a flexible work policy.

We are proud of our Employee Stock Purchase Plan (ESPP) that is available to all full-time employees and has a participation rate of over 60%.

We conduct an annual, anonymous employee survey, supplemented by pulse surveys throughout the year, to help measure the overall engagement and satisfaction level of our team. Our senior leadership team regularly assesses engagement, as well as other metrics such as employee turnover, to understand and identify potential opportunities for improvement.

**Great Place To Work – UK
2020 Award Recipient³**

Training and Development

We are committed to fostering an environment where our employees can continuously learn and develop. Insulet offers programs to address both leadership and professional skills development. Employees undergo a robust onboarding program that includes education in diabetes, the Omnipod suite of products, business strategy, and other key functions in the organization. Employees have access to monthly learning programs and virtual and online learning programs. We offer several leadership development programs to help grow future leaders of our company. We offer several resources for new and experienced leaders including a new manager introduction to Insulet, a three-day leadership offsite,

³ www.bestworkplacesawards-uk.co.uk

and a new manager six-month curriculum that is customized to the unique needs of the relevant business function.

For all full-time employees who attend an accredited educational institution, Insulet offers tuition reimbursement of up to \$5,250 annually for courses taken in pursuit of an undergraduate degree and up to \$10,000 annually for courses taken in pursuit of a graduate degree.

All employees are asked to complete an annual personal development plan, and in 2019, 90% of employees had a development review. These plans are discussed with and supported by their leaders.

Diversity and Inclusion

Insulet's success thrives on the diversity of perspective, thought, experience, and background within our workforce. We are committed to providing equal opportunity in all aspects of employment. We provide diversity, anti-discrimination, and anti-harassment training that is required for all managers. We expect to conduct this training at least annually going forward. Leaders who complete our three-day leadership program receive instruction in subconscious bias and hiring behaviors that support diversity.

In 2019, we launched a mentoring initiative, which paired high potential employees with a senior leader mentor. Additionally, we launched Employee Resource Groups, a program designed to support various diversity and inclusion efforts in the organization. We have targeted recruitment programs for veterans and university students, including those of diverse backgrounds. As part of our commitment, we monitor gender pay equality on an annual basis.

Giving Back

In line with our mission and guiding principles, we serve as a good corporate citizen and seek to enrich and strengthen the communities in which we live and work. We do this through a variety of activities to support advocacy and educational activities and making contributions to, and participating in events sponsored by, non-profit organizations and registered charities worldwide. We also encourage our employees to get involved in their local communities and provide a number of employee engagement opportunities that range from the Tour de Cure to a Toys for Tots campaign. In 2019, we supported over 30 advocacy organizations and dozens of charitable and non-profit organizations.

Environment

We promote sustainability throughout the lifecycle of our products from the design stage, through manufacturing processes, to end-of-use recycling. Our Innovation design centers consider processes such as using lighter plastics and eliminating certain metals. During manufacturing, we focus on running efficient operations that minimize our impact on the environment. In 2019, we began installation of solar panels on our Acton, MA manufacturing facility to help reduce our energy costs and carbon footprint. In France, we fund collection and recycling programs for our Omnipod devices where they are collected, disassembled, and recycled, including testing and re-use of batteries if they have remaining life. In Europe, we provide an option for all markets not run by distributors to return products where they are then incinerated with energy recovery.

Promoting sustainability in our supply chain, our public tenders include questions that award points for supplier sustainability practices and programs.

Integrity

We know the reputation of our company and our products is critical to our success. Insulet is committed to improving the lives of people with diabetes through innovative and high-quality products manufactured and delivered in the most ethical manner.

Ethics and Compliance

We are guided by our [Code of Business Conduct and Ethics](#) (Code of Conduct) that applies to all directors, officers and employees of the company. All employees are trained on our ethics program when they join the company, receive regular training on our policies periodically thereafter, and must certify annual compliance with our Code of Conduct.

We seek to conduct our business in compliance with applicable laws and regulations, and our Code of Conduct mandates that directors, officers, and employees must deal ethically and fairly with the company's suppliers, competitors, and customers in all business dealings. Among other things, our Code of Conduct addresses:

- Anti-Corruption. All employees must comply with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and all other applicable anti-bribery/anti-corruption and anti-kickback laws and regulations. The company's policies and procedures for compliance with anti-corruption laws are memorialized in our FCPA and Bribery Act Policy.
- Anti-Harassment & Anti-Discrimination. Insulet is committed to maintaining a respectful workplace. We maintain a strict policy prohibiting discrimination and harassment against employees and job applicants based on: veteran status, race, color, religion, sex, sexual orientation, gender identity, age, national origin or ancestry, physical or mental disability, genetic information or other consideration protected by law.
- Political Contributions. Company funds may not be used for political contributions without the approval of the company's Compliance Officer.
- Employment Conditions/ Human Rights. The company adheres to all applicable laws and regulations regarding labor and employment. We support fundamental human rights and are committed to a work environment that is free from human trafficking and slavery. We do not allow child or forced labor by the company, and we do not knowingly work with business partners that employ children or forced labor.

We use technology and automated tools to augment our staff capabilities to monitor and report on compliance matters. In addition, to help ensure compliance, we maintain a whistleblower program. It offers anonymous, 24/7 reporting of any ethical concern with information and contact details provided in our Code of Conduct and on our company intranet. Employees may contact the Compliance and Ethics Hotline anonymously at (866) 456-3746. All reported incidents are investigated until resolved.

Responsible Marketing

Insulet is committed to exchanging information with healthcare providers in an ethical and responsible manner, and with the best interests of customers always in mind. The Company has established mandatory standards that all employees, consultants, contract workers, and temporary staff must follow when interacting with healthcare professionals and other customers.

We maintain collaborative relationships with healthcare professionals where appropriate in order to develop new products; determine appropriate and beneficial uses for products; support medical research and other educational, scientific and charitable activities; provide healthcare professionals and the public with information regarding the benefits and risks of Insulet's products; and obtain feedback and advice about our products from medical experts. In addition to requiring that all interactions with healthcare professionals and other customers comply with applicable laws, we seek to ensure that our interactions with healthcare professionals consistently meet or exceed industry guidelines.

Product marketing responsibility lies with both our Regulatory Affairs (for product labeling) and Legal departments. The designated Senior Director of Regulatory Affairs and Senior Director of Legal must review and pre-approve all marketing materials. All expense reimbursements paid to healthcare professionals are pre-approved by Insulet's Compliance department. In addition, all payments to healthcare professionals are reviewed retrospectively to ensure compliance with our policies. All promotional materials are reviewed and tracked via our web-based review and approval process.

All sales and marketing employees receive training on our ethical marketing policies and processes upon hire, and receive periodic continuing education including an annual training requirement. To ensure compliance, we conduct periodic reviews and internal audits to ensure adherence to our policies. Any identified issues or incidents are investigated and resolved following our CAPA program.

All payments made to healthcare professionals are disclosed as required at the U.S. national and state level, as well as in compliance with other national reporting requirements where we operate. Additionally, we are a Corporate Member of MedTech Europe and follow the MedTech guidelines.

Cybersecurity

The safety and security of our customers, customer data, and products is paramount in everything we do. Throughout the entire product lifecycle, from design, to manufacturing to customer use, Insulet's team of engineers, specialists and partners strive to make the most secure products possible. We have established a dedicated, global product security team and coordinated product disclosure program to supplement our robust product security practices. We align our cybersecurity oversight and management based on the International Electrotechnical Commission's (IEC) 27000 series (ISO/IEC 27000) and to the NIST "Framework for Improving Critical Infrastructure Cybersecurity" (NIST CSF).

In 2019, Insulet extended its ISO 27001:2017 Information Security Certification scope to include its global products and services. Insulet's leading Omnipod DASH™ Insulin Management Systems is accredited with both the ISO 27001 certification and the DTSec (Diabetes Technology Society) Cybersecurity Standard for Connected Diabetes Device Security certification.

ISO 27001 is the recognized standard for information security best practices that adheres to the highest international data security standards. DTSec leverages ISO/IEC 15408 to provide a framework for risk-based, multi-stakeholder definition of security requirements.

The BS EN (British Standard and European Standard) ISO 27001:2017 incorporates the requirements of BS ISO 27001:2013 to confirm that Insulet's information, processes, and controls are safe and secure.

We have audited compliance and development programs in place for the devices, systems, and services we sell consistent with applicable medical device regulatory requirements. Throughout the lifecycle of our medical devices, we continuously monitor for security risks. We assess and test vulnerabilities based on global standards, engage regulators, and communicate appropriate mitigations to key stakeholders. All employees receive at least annual training certification on cybersecurity and privacy, with supplemental micro-training targeted to employees in specific roles.

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