

CORPORATE GOVERNANCE DECLARATION 2012

Declaration of Conformity of the Board of Management and the Supervisory Board of STRATEC Biomedical AG with the German Corporate Governance Code pursuant to § 161 of the German Stock Corporation Act (AktG).

STRATEC Biomedical AG has complied with the recommendations made by the German Corporate Governance Code government commission concerning the management and supervision of German listed companies in the version dated May 15, 2012 since submitting its previous Declaration of Conformity on December 13, 2011 – with the exceptions outlined in that declaration. STRATEC Biomedical AG will comply in future with the recommendations made by the German Corporate Governance Code government commission concerning the management and supervision of German listed companies in the version dated May 15, 2012 with the following exceptions:

Points 2.3.1 and 2.3.3

The German Corporate Governance Code recommends that the company should, by providing corresponding forms and in other ways, facilitate the holding of postal votes in advance of the Annual General Meeting.

The company's Articles of Association have to date not accounted for the possibility of postal voting. The company believes that postal voting has not yet been sufficiently tested. Postal voting involves difficulties, particularly in determining the authenticity of the votes thereby cast. Furthermore, the company already offers its shareholders the opportunity of authorizing a voting proxy appointed by the company to exercise their voting rights. Shareholders are thus already enabled to cast their votes prior to the date of the Annual General Meeting, as a result of which the additional possibility of postal voting would not offer them any further assistance in exercising their rights as shareholders.

Point 3.8

If the company takes out a D&O insurance policy for the Board of Management, a deductible of at least 10% of the loss up to at least the amount of one and a half times of the fixed annual compensation of the Management Board member must be agreed upon.

A similar deductible must be agreed upon in any D&O policy for the Supervisory Board.

No deductible has been agreed in the D&O policy for the Supervisory Board. The Board of Management and Supervisory Board are of the opinion that the members of the Supervisory Board perform their duties in due awareness of their responsibilities without the need for any such deductible.

Points 5.2 and 5.3.1 to 5.3.5

The German Corporate Governance Code recommends that, depending on the specific circumstances of the company and the number of its members, the Supervisory Board should form specialist committees (including an audit and a nomination committee). Moreover, the Chairman of the Supervisory Board should assume the chairmanship of the committees which deal with the contracts concluded with members of the Board of Management and prepare the meetings of the Supervisory Board. Among other factors, the compensation paid to members of the Supervisory Board should account for the chairmanship and membership of committees.

The Supervisory Board of the company consists of the minimum legal requirement of three members and, in view of its size, has not formed any committees to date.

Point 5.4.6

The German Corporate Governance Code recommends that the compensation of the members of the Supervisory Board be disclosed in the notes to the financial statements or in the management report on an individual basis and broken down into its constituent components.

The compensation, broken down into its constituent components, has been and continues to be reported as an aggregate total for all members of the Supervisory Board. The transparency requirements of this Code recommendation are largely accounted for by disclosure of the composition of Supervisory Board compensation in § 13 of the company's Articles of Association.

Point 7.1.2

The German Corporate Governance Code recommends that consolidated financial statements should be made public accessible within 90 days of the end of the financial year and that interim reports should be made publicly accessible within 45 days of the end of the reporting period.

Due to the conversion from the total cost method to the cost of sales method, which is internationally more widespread and will thus facilitate comparison with other companies, it will not be possible to make the consolidated financial statements for 2012 publicly accessible within 90 days of the end of the financial year. Publication is planned for April 2013. The publication deadline for interim reports, by contrast, will be complied with.

Based on current planning, the company will then once again be able to publish future consolidated financial statements within the deadlines recommended by the Code.

Birkenfeld, December 7, 2012