



Hillrom™

GLOBAL THIRD PARTY CODE OF CONDUCT

Integriteit@het werk

CONFORMITEIT. Het begint bij u.

Intégrité@travail

CONFORMITÉ. Cela commence par vous.

Integrität@Arbeitsplatz

COMPLIANCE. beginnt bei Ihnen.

Integrità@Lavoro

CONFORMITÀ. Parte da te.

Integridad@laboral

COMPLIANCE. Empieza por usted.

Integritet@jobbet

EFTERLEVNAD. Det börjar med dig.

诚信@工作

合规。从您开始。

Integrity@Work

COMPLIANCE. *It starts with you.*

HILLROM GLOBAL THIRD PARTY CODE OF CONDUCT

Hillrom is committed to maintaining the highest standards of ethical conduct in all business practices, acting with integrity, and complying with all applicable laws, regulations, and industry codes of conduct. At Hillrom, compliance means much more than simply adhering to a set of predetermined rules. Compliance is the foundation of every facet of our business activities, and Hillrom requires its business partners to make a commitment to the highest standards of ethics, integrity, and compliance.

This Global Third Party Code of Conduct sets Hillrom’s requirements for distributors, suppliers, business partners, and other third parties registering, promoting, selling, and supplying Hillrom products or otherwise interacting with government officials or health care providers on our behalf (“Third Parties”).



COMPLIANCE WITH ALL LAWS, REGULATIONS, AND INDUSTRY CODES

All Third Parties will comply with Hillrom’s Global Third Party Code of Conduct, which requires Third Parties to conduct business in an ethical manner and comply with all applicable laws, regulations, and industry codes of conduct, including anti-corruption and anti-bribery laws such as the U.S. Foreign Corrupt Practices Act (“FCPA”) and export controls and economic sanctions laws and regulations. Third Parties must also comply with the applicable laws, regulations, and industry codes of conduct related to advertising and promotional activities, the environment, labor, antitrust and

fair competition, product registrations/licenses, harassment and discrimination, interactions with health care providers, data privacy, recordkeeping, and anti-money laundering.

The Global Third Party Code of Conduct is consistent with the values and principles Hillrom employees must follow pursuant to the Hillrom Global Code of Conduct and the Hillrom Global Anti-Corruption Policy (both available on hillrom.com).

RESPECTING THE RIGHTS OF OTHERS AND OUR ENVIRONMENT

- 1. Labor:** All workers deserve to be treated with dignity and respect, in accordance with the highest standards of human rights. All labor must be voluntary: Third Parties working with Hillrom may not use slave, child, bonded, indentured, or any other involuntary labor. Further, Third Parties must maintain a safe and healthy working environment for their employees and comply with all local laws and regulations, including those pertaining to minimum wages, overtime, and legally mandated benefits. Third Parties must respect the rights of workers to freedom of association, freedom of expression, and the right to be heard.
- 2. Harassment, Discrimination and Bullying:** Third Parties must maintain a work environment free from harassment, discrimination, and bullying. Harassment is defined as any unwelcome, offensive conduct sufficiently severe or pervasive to create a work environment reasonably viewed as hostile, intimidating, offensive or abusive, including social media activities. Harassment is unacceptable at Hillrom on the basis of: race; religious creed; color; national origin; ancestry; physical or mental disability; medical condition; genetic information; marital status (including registered domestic partnership status); gender (including pregnancy, childbirth, lactation and related medical conditions); gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify); age (40 and over); sexual orientation; Civil Air Patrol status; military and veteran status; and any other consideration protected by federal, state or local law (collectively referred to as “protected characteristics”).

Workplace bullying is likewise unacceptable at Hillrom. Bullying is defined as a pattern of offensive conduct (including electronically transmitted acts – i.e., cyberbullying, using social media, internet, mobile phone, etc.) that targets individual(s) and threatens, humiliates, or intimidates. It can cause a reasonable person in the victim’s position substantial emotional distress and undermine his/her ability to work.

At Hillrom, our values – especially Respect and Integrity – give us the courage, opportunity and mandate to create and strengthen a culture where everyone belongs. While at work we take pride in a healthy, safe and productive environment, free of non-inclusive behaviors such as harassment, discrimination and bullying. Hillrom is committed to creating and maintaining a workplace that exemplifies diversity and inclusion and we expect our Third Parties to share our commitment.

- 3. Environment:** Third Parties must strive to make their businesses sustainable and meet or exceed applicable environmental law, regulations and permit conditions. All required environmental permits, licenses, information registrations and restrictions must be obtained and their requirements followed.
- 4. Privacy:** Third Parties must take appropriate steps to safeguard any personal information received from Hillrom against unauthorized or unlawful use, disclosure, access, loss, alteration, damage and destruction. In order to protect such information, Third Parties must maintain a written information security program that includes appropriate organizational, technical, and physical safeguards designed to protect the availability, integrity, and confidentiality of personal information. Third Parties may be required to report security breaches related to Hillrom’s personal information to Hillrom upon discovery.



ACTING WITH INTEGRITY

- 5. Bribery and Improper Payments:** Hillrom prohibits bribery and corrupt conduct in any form. Third Parties must not, directly or indirectly, promise, offer, or give anything of value to a government official, health care provider or to any person in whatever form to win or retain business, secure an improper advantage, or otherwise improperly influence an official act or decision. Third Parties also must never offer an improper payment to, or receive an improper payment from, customers, suppliers, patients, other commercial partners, or anyone else. Improper payments include without limitations: kickbacks, bribes, gifts, meals, travel, entertainment, discounts, rebates, loans of equipment or provision of services, donations, grants, hospitality, commissions, honoraria, free products or services, samples, and job offers, or anything else of value — provided to secure an improper business advantage.
- 6. Conflicts of Interest:** Third Parties must be free of conflicts of interest that jeopardize their ability to take actions in the best interest of Hillrom. A “conflict of interest” occurs whenever a Third Party’s judgment and loyalty is divided between its responsibilities to Hillrom and to an outside interest, or when a Third Party employee conducts a business activity for his or her personal benefit or the benefit of a family member or friend. Hillrom expects Third Parties to immediately disclose any actual or potential conflicts of interest to Hillrom to ensure fair and prompt resolution.
- 7. Fair Competition:** Third Parties must respect and follow the letter and spirit of all applicable antitrust and competition laws. Third Parties must not engage in unfair business practices and may never

share confidential information with competitors (including bids, proposals, or strategies); discuss, coordinate, or agree with competitors to fix prices; allocate markets, territories, or customers; split or fix bids; or otherwise limit fair competition. Third Parties should refuse to take part in discussions or arrangements that may be seen as anti-competitive.

- 8. Confidentiality:** Third Parties must receive and keep all technical, regulatory, clinical, medical, scientific, commercial, and other data and information relating to Hillrom in complete confidence. Third Parties should treat all information or data relating to Hillrom as confidential unless that information is in the public domain. Third Parties may use or disclose Hillrom’s confidential information only when specifically authorized in writing by Hillrom. Third Parties may not use or share confidential information to trade or enable others to trade in Hillrom securities.
- 9. Sanctions and Trade Controls:** Third Parties must comply with all applicable laws and regulations relating to the export, reexport, transfer, or retransfer of Hillrom products and other items and may not take any action that would cause Hillrom to be in violation of such laws and regulations. As part of this requirement, Third Parties must comply with all applicable export controls, sanctions, and embargo laws and regulations, which may prohibit or restrict third parties from supplying items to, importing items from, or otherwise conducting business with certain countries/regions, entities, and individuals that are designated or restricted under various sanctions programs or that may be otherwise restricted by specific controls.

INTERACTIONS WITH HEALTH CARE PROVIDERS

- 10. Interactions with Health Care Providers:** Third Parties are prohibited from offering anything of value to a health care provider as a reward or incentive for past, present, or future purchases, uses, or recommendations of Hillrom products, or any other improper business advantage for Hillrom or a Third Party. “Health Care Provider” or “HCPs” include any individuals or entities that: ① are involved in the provision of health care services or items to patients; and ② purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Hillrom’s products.

- 11. Meetings, Meals, Travel, and Accommodations:** While conducting business related to Hillrom, Third Parties may meet with customers, health care providers, government officials, or other business clients. These meetings must be conducted in settings conducive to the exchange of information related to Hillrom and its products, such as conference sites or other meeting facilities. Meeting venues known for entertainment or recreation should not be used. In connection with these meetings, Third Parties may under certain circumstances pay for travel expenses or occasionally offer or accept meals/

refreshments if such expenses are: (a) permissible under local law and industry code; (b) modest and reasonable in accordance with local standards; (c) provided in the course of a bona fide business relationship; (d) incidental to the business purpose of the meeting; (e) not offered for the personal (i.e., non-business) benefit of the recipient; (f) not offered to a spouse or guest of a recipient; and (g) not likely to be perceived to be improper or otherwise embarrass Hillrom if publicly disclosed.

- 12. Gifts and Prohibition on Entertainment:** Hillrom discourages the giving or receiving of gifts to health care providers, government officials, or other business clients or customers. When working on behalf of Hillrom, Third Parties should never offer or receive gifts if doing so will induce improper behavior or create the appearance of impropriety. Gifts of cash, cash equivalents (e.g., gift certificates), or electronics (e.g., iPads) are always prohibited. In addition, it is never permitted to arrange for or provide entertainment to health care providers or government officials. Prohibited activities include, for example, theater, sporting events, golf, skiing, hunting, city tours, cultural excursions, and leisure or vacation trips.
- 13. Engagement of Health Care Providers:** Where permitted by local law and industry code, Third Parties may enter into fee-for-service arrangements with qualified individual Health Care Providers

only for legitimate services for which the Third Party has a bona fide need. Compensation must not exceed fair market value, and Third Parties must comply with the applicable rules of the Health Care Provider’s employer (such as notification or approval requirements), in addition to local law and industry code.

- 14. Funding Support:** Where permitted by local law and industry code, Third Parties may provide funding to Health Care Provider organizations and other health care sponsor organizations for legitimate scientific or educational purposes. When working on behalf of Hillrom, Third Parties may never pay for individual Health Care Providers to attend scientific or educational program.
- 15. Promotion and Sales of Hillrom Products:** Third Parties must comply with all applicable laws and regulations in the design, testing, production, promotion, registration, approval and distribution of Hillrom products. All information provided in the promotion and sale of Hillrom products and services, including availability and delivery of our products, must be accurate, balanced, and supported by data and relevant experience. Third Parties may promote and market Hillrom products for authorized uses only, and promotional materials must comply with applicable laws, regulations, and industry codes.

REPORTING, TRAINING, AND DOCUMENTATION

- 16. Product Complaint and Product Safety:** Third Parties that promote and/or sell Hillrom products must have a formal complaint system, governed by procedures that define the processes for managing, tracking, investigating, and reporting product complaints. All complaints related to Hillrom products must be immediately reported to Hillrom. Third Parties also must track and promptly report to Hillrom any adverse event associated with the use of a Hillrom product.
- 17. Books and Records:** Third Parties must maintain accurate books, records, accounts, and supporting documentation (such as detailed receipts) of all product sales and related transactions or expenses incurred on behalf of Hillrom (even if such expense will not be reimbursed by Hillrom), including, for example, any travel, meals or hospitality provided to a customer or Health Care Provider.

- 18. Training and Obligation to Comply:** Third Parties must communicate the provisions of this Code to all employees and any authorized subcontractors or other parties involved in Hillrom’s business. All parties involved in Hillrom’s business are required to comply with the provisions of this Code, in addition to all relevant laws and regulations.
- 19. Reporting Compliance Concerns:** Hillrom values the help of its Third Parties and their employees in identifying potential problems. Third Parties and their employees are encouraged to use Hillrom’s compliance reporting helpline to report concerns of real or potential violations of this Code or illegal conduct. Hillrom and its Third Parties are prohibited from taking any retaliatory action against any employee who in good faith reports a concern or illegal activity. Raising a concern in “good faith” means reporting information you believe to be true, even if it is later determined that no wrongdoing occurred.

Third Parties can report a concern on the Compliance Helpline at +1 (866) 433-8442, one of the local numbers below or online at www.Hillrom.ethicspoint.com.

U.S.....	1-866-433-8442	Lebanon	01-426-801
Australia.....	1-800-339276	Mexico	011-8008407907 (Spanish)
Austria	0800-291870	001-866-737-6850 (English)
Belgium	0800-77004	Netherlands	0800-0226174
Canada.....	1-866-433-8442 (English)	Norway	800-15654
.....	1-855-350-9393 (French)	Poland	0-0800-121-15-71
China (Northern)	10-800-712-1239	Portugal	800-8-12-499
China (Southern).....	10-800-120-1239	Russia	8-10-8002-6053011
Czech Republic	800-142-550	United Arab Emirates ...	8000-021
France	0800-902500	Singapore	800-1204201
Germany	0800-1016582	Spain	900-991498
Hong Kong.....	800-964214	Sweden	020-79-8729
India	000-800-100-1071	Switzerland	0800-562907
Italy	800-786907	Turkey	0811-288-0001
Ireland	1-800-61-5403	United Kingdom	08-000328483
Japan	05531-121520 (Japanese)		
.....	0044-22-11-2505 (English)		

For general compliance questions, Third Parties can contact the Global Compliance Office by phone +1 (877) 638-8093 (U.S. toll-free), +1 (312) 819-7267 (toll number for international callers) or email at GlobalComplianceOffice@Hillrom.com.