

Hill-Rom

Global Third Party Code of Conduct

Integriteit@het werk
CONFORMITEIT. Het begint bij u.

Intégrité@travail
CONFORMITÉ. Cela commence par vous.

Integrità@Lavoro
CONFORMITÀ. Parte da te.

Integritet@jobbet
EFTERLEVNAD. Det börjar med dig.

Integrität@Arbeitsplatz
COMPLIANCE. beginnt bei Ihnen.

Integridad@laboral
EL CUMPLIMIENTO. Empieza por usted.

信@工作
遵守法规。从您做起。

Integrity@Work

COMPLIANCE. It starts with you.

Enhancing outcomes for patients and their caregivers:



Hill-Rom Global Third Party Code of Conduct

Hill-Rom 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 Hill-Rom, 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 Hill-Rom requires its business partners to make a commitment to such highest standards of ethics, integrity, and compliance.

This Global Third Party Code of Conduct sets Hill-Rom’s requirements for distributors, suppliers, business partners, and other third parties registering, promoting, selling, supplying Hill-Rom products or otherwise interacting with government officials or health care providers on our behalf (“Third Parties”). “Hill-Rom” includes all Hill-Rom subsidiaries, including Hill-Rom International, Allen Medical, Aspen Medical, Aspen Surgical, Liko, Trumpf Medical, Welch Allyn, and Volker.



Compliance with All Laws, Regulations, and Industry Codes

All Third Parties working with Hill-Rom must conduct business in an ethical manner and comply with all applicable laws, regulations, and industry codes of conduct, including those related to advertising and promotional activities, the environment, labor, antitrust and fair competition, product registrations/licenses, harassment and discrimination, interactions with health care providers, anti-corruption and anti-bribery, export controls, economic sanctions, recordkeeping, and anti-money laundering. This Code does not require Third Parties to take any action or refrain from taking any action that would be prohibited or penalized by U.S. law.

Compliance with Hill-Rom Standards & Principles

In addition to following all applicable laws, regulations, and industry codes, Third Parties working with Hill-Rom also must comply with the standards and principles outlined in this Global Third Party Code of Conduct. This Global Third Party Code of Conduct is meant to provide you direction that is consistent with values and principles our own employees must abide by as expressed in the Hill-Rom Global Code of Conduct and the Hill-Rom Global Anti-Corruption Policy (both available on www.hill-rom.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 Hill-Rom 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 and Discrimination:** Third Parties must maintain a work environment free from harassment and discrimination. Harassment is behavior that creates an offensive, intimidating, humiliating, or hostile work environment that unreasonably interferes with another person's work. We also do not tolerate discrimination based on characteristics such as race, religion, sex, national origin, or other personal characteristics or beliefs. We expect our Third Parties to share our commitment to diversity and opportunity.
- 3. Environment:** Third Parties must strive to make their businesses sustainable and minimize adverse impacts on the environment. All required environmental permits, licenses, information registrations and restrictions must be obtained and their requirements followed. Hill-Rom expects Third Parties to conduct their business activities in harmony with the environment and to be attentive to environmental issues, including pollution, climate change, conservation of biodiversity, and responsible use of resources.
- 4. Privacy:** Third Parties must take appropriate steps to safeguard any personal information of Hill-Rom personnel, patients, and health care providers. Personal information includes individuals' name, address, birth date, and identification numbers. In order to protect such information, Third Parties must maintain a written information security program that includes administrative, technical, and physical safeguards designed to protect the security, integrity, and confidentiality of personal information.

Acting with Integrity

- 5. Conflicts of Interest:** Third Parties must be free of conflicts of interest that jeopardize their ability to take actions in the best interest of Hill-Rom. A "conflict of interest" occurs whenever a Third Party's judgment and loyalty are divided between its responsibilities to Hill-Rom and to an outside interest, or when a Third Party employee performs a business action for his or her personal benefit or the benefit of a family member or close friend. Hill-Rom expects Third Parties to immediately disclose any actual or potential conflicts of interest to Hill-Rom, such as if a Third Party employee or their family member has a relationship with a Hill-Rom employee who can make decisions affecting the Third Party's business.
- 6. 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.
- 7. Bribery and Improper Payments:** Hill-Rom 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 or health care provider 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 anything of value — such as kickbacks,



bribes, gifts, discounts, rebates, loans of equipment or provision of services, donations, grants, hospitality, commissions, free goods, samples, and job offers — provided to improperly influence a decision or transaction.

8. Educational Items and Gifts: Hill-Rom discourages the giving or receiving of gifts to health care providers, government officials, or other business clients or customers. When working on behalf of Hill-Rom, Third Parties generally may provide or receive gifts of modest value if gifts are: (a) permitted by local laws, regulations and industry codes; (b) customary in the business relationship; (c) infrequently provided; and (d) given and documented in a fully transparent way. 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.

9. Meals, Travel, and Prohibition on Entertainment: While conducting business related to Hill-Rom, 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 Hill-Rom and its products, such as conference sites or other meeting facilities. In connection with these meetings, Third Parties may occasionally offer or accept modest, reasonably priced meals/refreshments in compliance with the regulations of the country where the Health Care Provider is employed or licensed to practice. Under certain situations, such as when a customer is brought on-site to one of Hill-Rom's showrooms, such Third Party may accept or pay and/or reimburse for travel expenses for such meetings as long as such meetings cannot reasonably be held in a location near the customer, health care provider, government official, or other business client (e.g., hotel accommodation in connection with a scientific meeting or product demonstration) and 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 Hill-Rom if publicly disclosed.

It is never permitted to 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.

10. Confidentiality: Third Parties must receive and keep all technical, regulatory, clinical, medical, scientific, commercial, and other data and information relating to Hill-Rom in complete confidence. Third Parties should treat all information or data relating to Hill-Rom as confidential unless that information is in the public domain. Third Parties may use or disclose Hill-Rom's confidential information only when specifically authorized in writing by Hill-Rom. Third Parties may not use or share confidential information to trade or enable others to trade in Hill-Rom securities.

11. Trade Controls: Third Parties must comply with all applicable laws and regulations relating to the export, reexport, transfer, or retransfer of Hill-Rom products and other items. As part of this requirement, Third Parties must comply with all applicable sanctions and embargo laws and regulations, which may prohibit 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.

Interactions with Health Care Providers

12. 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 Hill-Rom products, or any other improper business advantage for Hill-Rom or a Third Party. Improper incentives may include but are not limited to inappropriate meals, entertainment, trips, gifts, free product or services, honoraria, grants or scholarships.

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 providers and other health care organizations for a legitimate scientific or educational purposes. When working on behalf of Hill-Rom, Third Parties may never compensate individual health care providers for time spent simply attending a scientific or educational program.

15. Promotion and Sales of Hill-Rom Products: Third Parties must comply with all applicable laws and regulations in

the design, testing, production, promotion, registration, approval and distribution of Hill-Rom® products. All information provided in the promotion and sale of Hill-Rom 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 Hill-Rom 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 Hill-Rom 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 Hill-Rom products must be immediately reported to Hill-Rom. Third Parties also must track and immediately report to Hill-Rom any adverse event related to a patient using or exposed to a Hill-Rom 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 Hill-Rom (even if such expense will not be reimbursed by Hill-Rom), including, for example, any meals or hospitality provided to a customer.

18. Training and Obligation to Comply: Third Parties are expected to communicate the provisions of this Code to all employees and any authorized subcontractors or other parties involved in Hill-Rom’s business. All parties involved in Hill-Rom’s business are required to comply with the provisions of this Code, in addition to all relevant laws and regulations.

19. Reporting Compliance Concerns: Hill-Rom values the help of its Third Parties and their employees in identifying potential problems. Third Parties and their employees are encouraged to use Hill-Rom’s compliance reporting hotlines to report concerns of real or potential violations of this Code or illegal conduct. Hill-Rom 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.hill-rom.ethicspoint.com. 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@hill-rom.com.

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

