SUMMARY OF HILL-ROM’S ANTI-CORRUPTION POLICY

Hill-Rom’s distributors, consultants, and other representatives play an important role in the Company’s business. As partners and representatives of Hill-Rom, you are expected to adhere to high standards of ethical conduct at all times. This is especially important in all dealings with Healthcare Providers and Government Officials. For that reason, you must comply with the following policy at all times:

Hill-Rom has a zero tolerance policy for bribery. No Hill-Rom employee, agent, distributor, vendor, supplier, or other representative may, either directly or indirectly:

- offer or give anything of value to a Government Official, Healthcare Provider, or any other person, as an incentive to, or in exchange or as a reward for, obtaining an improper business advantage for Hill-Rom; or
- give, offer, solicit or accept anything of value that is intended to induce the recipient to violate his or her duty of loyalty to his or her employer.

What are the consequences if I violate this policy?

Hill-Rom will terminate the business relationship and may report your conduct to law enforcement authorities.

What should I do if I am uncertain whether an activity would violate this policy?

You should immediately contact the senior Hill-Rom employee with whom you work. You should not act until you have consulted with Hill-Rom.

I am not a U.S. person or company. Business is conducted differently in my country. Why am I required to comply with this policy?

As someone who acts on behalf of Hill-Rom, you are expected to adhere to high standards of ethical conduct at all times. Hill-Rom is a U.S. entity that is subject to laws and rules in the United States and other countries. Hill-Rom may be liable if its representatives do not comply with these policies.

How can I learn more about Hill-Rom’ anti-corruption policy and my responsibilities under that policy?

You can find a copy of Hill-Rom’s Global Code of Conduct here (available in other languages on this page) and Anti-Corruption Policy here. Hill-Rom will provide anti-corruption compliance training to you at your request.