

Global Anti-Bribery and Corruption Policy

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1. Summary

This Policy provides an overview of Getinge's commitment and principles against bribery and corruption.

Getinge is committed to the highest norms of responsible business conduct. We do not accept bribery or corruption in any form, and will be proactive in following ethical business practices. Corruption and bribery in any form contradicts our values and damages the trust and confidence of our patients, customers, shareholders, coworkers, business partners and other stakeholders have in us and our company. Corruption and bribery also contradicts values of democracy, and violates the laws in the countries where we do business. In addition to harming our brand and reputation, violation of these laws can have significant and serious legal and financial consequences for Getinge, as well as for individuals, who participate in corrupt business practices.

This Anti-Bribery and Corruption Policy applies to all employees, and other representatives acting directly or indirectly on behalf of Getinge. This includes business partners such as consultants, distributors and sales agents, and other service providers.

Getinge is also expected to abide by all applicable Anti-Bribery and Corruption laws, such as the US Foreign Corrupt Practices Act, the UK Bribery Act, the Brazil Clean Company Act, and similar laws in every country in which we operate. If a topic is covered by both applicable national legislation and this Policy, then the stricter regulation shall apply.

2. Definitions

Corruption - abuse of entrusted power for private gain

Bribery/Bribe - offering, promising, authorizing, providing, requesting, accepting or receiving a financial or another advantage, either directly or indirectly, with the purpose of encouraging a person to misuse their authority. A bribe does not necessarily involve money, but can be anything of value.

Anything of Value - any type of benefit to the recipient. This includes but is not limited to cash, loans, gifts, jobs, political contributions, donations, business opportunities, tuition, scholarships, entertainment, travel and accommodations, excessive commission rates, unnecessary consulting

arrangements, below market leases or rentals and unearned waivers of debts. It also covers intangible benefits and advantages, such as preferential treatment, access to information etc.

Employees – all individuals, whether temporary or permanently working at all levels for Getinge, including full-time and part-time employees, directors, officers, managers, consultants, experts, workers, interns and agency personnel, who work at Getinge premises or under the direction of Getinge.

Business Partners – all third parties such as individuals and entities that provide products or services to Getinge, or that are engaged or instructed to act for or on behalf of Getinge, such as e. g. suppliers (and sub-contractors if used while engaging with Getinge), consultants, distributors, agents and other representatives.

Government Official means:

- any official, director, officer or employee of a government agency or other government unit
- any political party official or any candidate for political office
- any officer, director or employee of any public international organization (such as World Bank or the United Nations)
- any person acting in an official capacity on behalf of any government, agency or organization. Also includes officers and employees of government-owned companies, or companies substantially controlled by such governments.
- A close relative (spouse or partner, child, child of spouse or partner, parents, stepparent, siblings, step-siblings, in-laws, aunt, uncle, niece, nephew, first cousins, grandparent and grandchildren or any other family member) of any of the above.

Note: In countries with tax-funded medical and health care, HCPs may also be considered Government Officials.

Health Care Professional (HCP) – any individual, whether in a clinical or non-clinical role, who is authorized or licensed to provide health care services or items to patients or is involved in the decision to purchase, prescribe, order, or recommend a Getinge product. This term includes, but is not limited to, clinicians (i.e., physicians, nurses, pharmacists), technicians, laboratory scientists, researchers, procurement professionals, and administrative personnel at provider entities (e.g., hospital purchasing agents). Note: In countries with tax-funded medical and health care, HCPs may also be considered Government Officials.

Health Care Organization (HCO) – any health care, medical or scientific association or organization which may have a direct or indirect influence on the prescription, recommendation, purchase, order, supply, utilization, sale or lease of medical technologies or related services, such as a hospital or group purchasing organization, clinic, laboratory, pharmacy, research institution, foundation, university or other teaching institution or learned or professional society, patient organization or through which one or more Health Care Professionals provide services.

3. Scope and Objective

This Policy is valid for all Getinge companies, its subsidiaries and joint operations (jointly “Getinge”) and applies to all our employees and other representatives acting directly or indirectly on behalf of

Getinge, as well as consultants and agency personnel, who work at Getinge premises or under the direction of Getinge.

Getinge expects any business partner to act to the same standards of honesty, integrity and fairness, including through contractual provisions requiring compliance with the principles set forth in this Policy, our Business Partner Code of Conduct and applicable laws.

This Policy provides an overview of Getinge's commitment and principles against bribery and corruption. The objective is to support and enable anyone acting for, with or on behalf of Getinge, to act in line with our values, rules and expectations. Further detailed guidance is available in the referenced Directives and Instructions.

We expect all employees and business partners to read, understand and follow this Policy and consistently apply its high standards when doing business for, with or on behalf of Getinge.

4. Principles

Getinge is committed to the highest norms of business conduct. We act in a responsible way, based on our Code of Conduct. We advocate free and fair trade, striving for forthright competition and ethical conditions, respecting the legal frameworks of the countries in which we operate.

Getinge makes a clear statement against Bribery and Corruption:

Getinge does not accept Bribery or Corruption in any form.

At Getinge, we do not offer, promise, authorize, provide, request, accept, receive, pay bribes or anything of value, either directly or indirectly, to influence a decision, to obtain or retain business or to secure an improper advantage.

At Getinge we avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty.

It is also prohibited to contribute financial means to any Business Partner when we suspect, or have reason to suspect, that funds will be – partially or wholly - used to pay a bribe, induce, encourage or reward a decision. Due care must therefore be exercised to make sure money paid to business partners is not used for corruption.

Private funds are not allowed to be used to accomplish what is prohibited by this Policy and other relevant directives.

5. Areas of Application

Government Officials

At Getinge, we do not differentiate between corruption in private and public sectors. However, laws and regulations are strict when dealing with Government Officials. Reasonable corporate hospitality that is acceptable with other business associates, might not be acceptable when Government Officials are involved. The definition of what could constitute a bribe to a Government Official is broad

and can occur even when the benefit being offered is small, such as gifts, entertainment and even business meals.

At Getinge, it is not allowed to offer, promise, authorize or give any gift and payment of value or other benefit, either directly or indirectly, to Government Officials (including a family and close associates of public officials), who exercise public authority, with the intent of attempting to influence official behavior or decision-making process.

Health Care Professionals and Health Care Organizations

Interaction with HCPs and HCOs is especially sensitive and increasingly regulated through local legislation, describing how such interaction can take place without risking illegal inducement or bribery.

Getinge's interactions and cooperation with HCPs and HCOs must meet the highest ethical business standards and must comply with applicable laws, regulations and industry codes. Further, in several countries all interaction, irrelevant of cause or purpose, must be transparently reported.

Getinge should engage HCPs / HCOs only for legitimate and necessary business purposes. Relationship building is not considered a legitimate business purpose, even if other legitimate business purposes also exist. At all times, it is important that Getinge and HCPs / HCOs maintain an independent approach towards each other and interact and cooperate in accordance with applicable laws, regulations and industry codes.

See further: [Directive on Interaction with Health Care Professionals and Health Care Organizations](#)

Conflict of interest

A Conflict of Interest is when financial or other considerations could influence, or appear to influence, an employee's professional judgement, performance or decisions.

Getinge employees are expected to act at all times in Getinge's best interest and to exercise sound judgement, unaffected by private interests or divided loyalties. All cases of potential, actual and perceived Conflict of Interest must be immediately disclosed and valued in accordance to the Global Directive on Conflict of Interest.

See further: [Global Directive on Conflict of Interest](#)

Facilitation payments

Facilitation payments are payments (normally small or insignificant put into relation to the gains of such payments) made to Government Officials for carrying out or speeding up routine services the person making the payment is legally entitled to receive, for example, to expedite visa applications, customs clearance, administrative procedures, etc. Getinge strictly prohibits making, authorising or accepting facilitation payments, whether made it directly or indirectly through a third party. All requests and demands for facilitation payments must be promptly reported to your direct manager and Regional Ethics & Compliance Officer.

In the event of some exceptional circumstances, payments may be demanded from Getinge employees under threat of violence, personal harm or imprisonment, Getinge employees are

authorized to make so-called “safety payments” under these circumstances to secure their own safety or the safety of others. Once the immediacy of the situation has been resolved, however, the payment must be reported to the direct manager and Regional & Ethics and Compliance Officer. Any such payment always must be accurately recorded in Getinge’s books and records.

Business Partners

Getinge can be held responsible for the conduct of its business partners. Due care is exercised when engaging with business partners. Particular concerns or deviations, “red flags”, are investigated and necessary precautions and actions are taken to eliminate or mitigate the risk for bribery and corruption in relation to business partners. The due care processes should also be applied with regards to financial transactions and money flows to ensure that Getinge does not become complicit in money laundering offenses.

All procurement activities at Getinge shall be performed in compliance with the Purchasing Policy which clearly states basic principles regarding fair selection of suppliers and segregation of duties.

The mergers and acquisitions are conducted according to Getinge’s internal M&A process which stipulates principles for practicing due care and performing anti-corruption due diligence procedures.

Getinge performs background checks and due diligence on Business Partners; the process, roles and responsibilities are described in the Third Party Engagement Directive.

See further: [Third Party Engagement Directive](#), and [Getinge Purchasing Policy](#)

Gifts and Hospitality

Getinge employees shall approve business hospitality and gifts proposals only if they demonstrate a clear business objective and are modest and appropriate for the nature of the business relationship.

We may not offer or accept gifts, payment or hospitality to encourage or reward a decision. Using the means of gift and hospitality to conceal corrupt intent is never allowed regardless of whether the actor is an employee or a third party acting on our behalf.

Gifts or business hospitality must be offered or accepted only if in accordance with local legislation and company standards. Some countries may have laws that are stricter than the principles laid forth in our policies; in these cases, the stricter rule applies.

Interactions with healthcare professionals (HCPs) is governed by the Directive on Interactions with Healthcare Professionals and Healthcare Organizations; this directive must be followed when the matter relates to interacting with an HCP.

See further: [Global Gifts and Hospitality Directive](#)

Sponsorship and Donations

It is not permissible to use charitable or political donations or sponsorships as a way of concealing a bribe.

Getinge has a Sponsoring and Donation Directive which clarifies our approach towards corporate giving – philanthropic donations, community projects, stakeholder relations grants and sponsorships. Sponsorships and donations need to be in accordance with this Directive.

See further: [Sponsorship & Donation Directive](#).

Books and Records / Internal Controls

Getinge shall make and retain complete and accurate books, records, and accounts in reasonable detail that fairly reflect company transactions and the disposition of company assets. Mischaracterizing, disguising, or improperly recording any transaction, or the use of funds or assets, is strictly prohibited.

All financial transactions must be documented, regularly reviewed and properly accounted for in the books and records of the relevant Getinge entity.

All relevant financial controls and approval procedures must be followed.

6. Breaches against the policy – Speak up

Do not hesitate to raise a concern. Any Getinge employee, who suspects violations of this Policy is expected to speak up and raise the issue to their line manager, Human Resources, to the Ethics and Compliance Office, or to use the Getinge Speak-Up Line. The Speak-Up Line is available on Getinge internal and external webpages.

At Getinge, we do not accept any form of retaliation against someone who speaks up, expresses concerns or opinions, reports potential or actual violations of policies and laws in good faith.

See further: [Speak Up and Non Retaliation Directive](#).

7. Roles and Responsibilities

All Getinge employees are individually responsible for reading, understanding and complying with this Policy. Each employee is responsible for acting in accordance with this Policy, every line manager is responsible for making sure each team member has access to this Policy and related Directives, Instructions and other guidelines. The line manager is also responsible for ensuring that relevant procedures and internal controls are followed to prevent and detect bribery and corruption.

Day-to-day reinforcement, including regular information and training on anti-corruption issues, as well as compliance follow-up, is part of every manager's responsibility, with the support of the Ethics and Compliance team.

Violations against the Policy can lead to disciplinary action, up to and including termination.

8. Framework

This Policy is part of Getinge's Governance Framework, which includes:

- Code of Conduct, Our Cultural Values, Strategic framework, Global Policies approved by the Board of Directors, Global Directives approved by the CEO or direct reports to the CEO as well as Global Instructions.
- Decisions made by the CEO or otherwise under the Delegations of Authority as approved by the CEO
- The Ethics and Compliance team is responsible for ensuring that the latest version of this Policy is published and available to all employees on the Getinge intranet. This Policy will be reviewed every other year or as needed.
- The original language of this Policy is English.

9. Guidance and assistance

To guide our conduct when it comes to bribery and all forms of corruption, there is this Policy as well as several directives and instructions. If you have questions on this policy or you are uncertain which rules apply, please contact the Ethics & Compliance team.

Useful links:

- [Code of Conduct](#)
- [Directive on Interaction with Health Care Professionals and Health Care Organizations](#)
- [Global Directive on Conflict of Interest](#)
- [Third Party Engagement Directive,](#)
- [Getinge Purchasing Policy](#)
- [Global Gifts and Hospitality Directive](#)
- [Sponsorship & Donations Directive](#)
- [Speak Up and Non Retaliation Directive](#)