



STERIS Supplier Code of Conduct

Version #

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STERIS Supplier Code of Conduct

STERIS plc (“STERIS”) believes in conducting business with integrity and honesty and in accordance with all applicable laws and regulations of the countries in which it operates. STERIS expects its suppliers to comply with the laws of the countries in which they operate, including but not limited to the European Union Customs Code, the EU Restriction of Hazardous Substances Directive, the UK Modern Slavery Act, the US Foreign Corrupt Practices Act, the UK Bribery Act, the US Dodd-Frank Conflict Minerals Rules, Data Privacy, and all applicable local labor and employment laws. STERIS values worker health and safety, and holds as a priority preserving its standing as a socially responsible entity. The STERIS Supplier Code of Conduct defines the minimum requirements and expectations for the ethical behavior of STERIS suppliers (“Suppliers”). STERIS expects its Suppliers to strive to exceed both these minimum requirements and industry best practices.

Scope

The Supplier Code of Conduct applies to all Suppliers of goods and services to any STERIS business or Supplier, and to any Supplier’s employees, parent, subsidiaries or affiliated entities and subcontractors. STERIS expects Suppliers to ensure that this Supplier Code of Conduct is communicated to their employees, parent, subsidiaries and affiliated entities as well as any subcontractors and to require their next tier suppliers to acknowledge and implement this Supplier Code of Conduct. This communication should be in the local language of the Supplier and provided in a manner understood by all.

Publicity and Confidentiality

STERIS prohibits the public disclosure of its name, logo, likeness, Supplier relationships, products, parts, designs or any other non-public information in any press release, prospectus, offer to do business, Customer list, or website, including, without limitation, product displays, without prior written authorization. As a publicly traded company, disclosure of STERIS’s material non-public information could lead to violations of applicable securities laws. Suppliers must not disclose to others and will not use for their own purposes or the purpose of others any trade secrets, confidential information, knowledge, designs, data, skill or any other information considered by STERIS as “confidential” or “non-public”. Suppliers must safeguard and make only appropriate use of confidential information and ensure that all their employees do the same.

Documentation and Records

STERIS expects its Suppliers to honestly and accurately record and report all business information, and create, retain, and dispose of business records in full compliance with applicable legal and regulatory requirements.



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Anti-Corruption

Suppliers must comply with the anti-corruption laws of the countries in which they do business, including, as appropriate the UK Bribery Act, the Brazil Clean Company Law, and the United States Foreign Corrupt Practices Act (“FCPA”). Suppliers may not make any direct or indirect payments or promises of payment to foreign government officials or others for inducing that individual to use his/her position to obtain or retain business. In accordance with the UK Bribery Act and the FCPA, STERIS expects its Suppliers to honestly and accurately record and report all business information, create, retain, and dispose of business records in full compliance with applicable legal and regulatory requirements.

Tax Compliance

Suppliers must follow applicable tax codes. STERIS expects its Suppliers to comply with all applicable tax requirements, including, but not limited to payroll tax, value added tax (VAT), goods and services tax, income tax, sales tax, customs and import duties, use tax and property tax. Suppliers must not illegally evade taxes through any means, including, but not limited to, underreporting income, inflating deductions or expenses, laundering money, or concealing funds in offshore accounts.

Sustainability and Social Responsibility

STERIS expects its Suppliers to conform to business practices that preserve and protect the environment, contribute to the social well-being of the communities in which they do business and have operations, and demonstrate accountability and transparency in sustainability performance. Suppliers must conserve natural resources, avoid the use of hazardous materials where possible, and promote activities that reuse and recycle.

Import/Export laws

Suppliers must comply with all applicable trade laws of the United States, the European Union, and any other nation relating to import/export matters, including the European Union Customs Code. This includes timely provision of all information necessary to comply with import requirements of the United States or other countries of destination, and not exporting any products received from STERIS to any proscribed country listed in the U.S. Export Administration Regulations. Suppliers will state the country of origin on goods, packaging and invoices as well as provide proper documentation to support available free trade agreement claims.

Facility and Supply Chain Security

Suppliers must maintain adequate security at all facilities and implement supply chain security procedures designed to prevent the introduction of non-manifested cargo into outbound shipments (e.g. drugs, explosives, bio-hazards or other contraband) in alignment with applicable law, including the principles of the U.S Customs and Border Protection’s Customs-Trade Partnership Against Terrorist (C-TPAT) program.



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Suppliers agree to provide required certification or security questionnaire responses related to C-TPAT. Additionally, each facility must have written security procedures and maintain documented proof of the adequate controls implemented to guard against introduction of non-manifested cargo.

Conflicts of Interest

Suppliers must avoid the appearance of improprieties or conflicts of interests. Suppliers must not deal directly, including engaging in contract negotiations, with any STERIS employee that has a financial interest in the Supplier. Similarly, Suppliers must not deal directly with any STERIS employee that is a spouse, domestic partner, family member or relative of the Supplier. It is the obligation of both the Supplier employee and the STERIS employee to proactively disclose any of the aforementioned relationships.

Working Hours and Wages

Suppliers' employees shall not work more than the maximum hours permitted under applicable law. Wages paid to employees must be at least equal to the applicable minimum wage and any other applicable statutory benefits. Any overtime hours must be paid at the legally mandated pay rates.

Responsible Sourcing

Suppliers must not incorporate materials or parts in materials, parts or services supplied to STERIS that would violate any law or regulation because of the origin of the material, part or service. Suppliers must have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers must exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to STERIS upon request.

Gifts and Entertainment

Suppliers must use discretion and care to ensure that expenditures on STERIS personnel or representatives are reasonable and in the ordinary and proper course of business and could not reasonably be construed as an improper inducement or bribe, or otherwise violate applicable laws and/or regulations. In any case, gifts and entertainment cannot be offered such that they are construed as intended to influence the judgment of the recipient to secure unfair preferential treatment or gain improper advantage. A general guideline for evaluating whether a business gift or entertainment is appropriate, is whether public disclosure would be embarrassing to the Supplier, STERIS, or the recipient. Suppliers are responsible for ensuring that acceptance of any business gift or entertainment is proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment or otherwise violate applicable laws and regulations.



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Non-Discrimination

Hiring and employment decisions must be made solely on the basis of the skill, ability and performance of workers or employees. Discrimination on the basis of race, color, religion, gender, sexual orientation, gender identity and expression, political opinion, or national origin is not permitted.

Modern Slavery and Human Trafficking

The STERIS Policy on Modern Slavery and Human Trafficking prohibits modern slavery and human trafficking in its operations, in its supply chain, and by its business partners around the globe. This policy is consistent with our fundamental ethical values: integrity, mutual respect, responsibility, and corporate citizenship, as described in the STERIS Code of Business Conduct. STERIS employees, contractors, subcontractors, vendors and suppliers must not engage in any practice that constitutes modern slavery in any of their business activities. STERIS Suppliers and business partners found to be in violation of this policy are subject to disciplinary action, up to and including termination of the business relationship.

There shall be no unreasonable restrictions on workers' freedom of movement, or unreasonable restrictions on entering or exiting the Supplier-provided facilities. All work must be voluntary, and workers must be free to leave work at any time or terminate their employment.

Humane Treatment


Suppliers may not engage in harsh or inhumane treatment, coercion or verbal abuse of workers or any threat of such treatment. Discipline policies and procedures must be clearly communicated to workers.

Responsibility to Report

Suppliers shall promptly report to STERIS any known breach of this Supplier Code of Conduct and implement a corrective action plan to cure the non-compliance (furnished to STERIS in writing). If a Supplier fails to meet the corrective action plan commitment, STERIS may terminate the business relationship, including suspending placement of future orders and potentially terminating current production. STERIS reserves the right to hold Suppliers responsible for reasonable costs of investigating non-compliance. STERIS also reserves the right to terminate relationship, regardless of mitigation.

Non-Retaliation

STERIS will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior or a possible violation of the Supplier Code of Conduct.

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Supplier Certification of Compliance

By its acceptance of any purchase order from STERIS or delivery of any goods and/or services to STERIS, the Supplier acknowledges its acceptance of this Supplier Code of Conduct and its intention to comply with its requirements and agree to report any information alleging a violation of this Supplier Code of Conduct to the STERIS Legal Department or the STERIS Compliance Department.

STERIS encourages Suppliers, their employees and subcontractors with questions regarding the STERIS Supplier Code of Conduct to contact STERIS regarding their concerns. Suppliers and their employees should work with their STERIS contact in resolving business practice or compliance concerns. Should it not be possible or appropriate to resolve a given concern directly with their STERIS contact, Suppliers should contact STERIS’s Business Code of Ethics Hotline using the dialing/weblines reporting instructions below.

Integrity Helpline Reporting

To report unethical or compliance related issues over the phone, please use the STERIS Integrity Helpline by dialing the phone numbers and access codes for the country which you are located. The phone numbers can be found at the following weblink:

- https://www.steris.com/about/business/code_of_conduct.cfm

Integrity/Help and Weblines Reporting

To report unethical or compliance related issues online, please use the STERIS Integrity Weblines at:

- Within the United States: www.reportlineweb.com/Steris
- International: <https://iwf.tnwgrc.com/steris>