



Code of Business Conduct

STERIS Code of Business Conduct

Message from Dan

Fellow STERIS Associates:

The STERIS Code of Business Conduct (the “Code”) is the cornerstone for how we conduct ourselves as STERIS Associates and how we interact with our Customers, suppliers, communities, and each other. It also lays out the details for how to act if a violation of the Code is observed. These boundaries are fundamental to the Company’s policies and procedures, which further implement appropriate behavioral guidelines for conducting business.

We each have a responsibility to review and adhere to the Code, and we are all responsible for speaking up if we are aware of activities which do not adhere to the Code.

We all have a responsibility to help make the world a better place. Our efforts go beyond product and service solutions, as we recognize our role as a company and individuals to help create a healthier and safer world, which includes a more sustainable future.

Thank you for all you do for STERIS and our Customers.

Dan

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Our Mission, Vision and Values

MISSION

STERIS is a leading global provider of products and services that support patient care with an emphasis on infection prevention. WE HELP OUR CUSTOMERS CREATE A HEALTHIER AND SAFER WORLD by providing innovative healthcare, life sciences and dental products and services.

VISION

INSPIRED BY OUR CUSTOMERS' EFFORTS TO CREATE A HEALTHIER AND SAFER WORLD, and guided by our legacy of leadership and innovation, we strive to be a GREAT COMPANY. To STERIS, this means we will make a difference by providing WORLD-CLASS PRODUCT AND SERVICE solutions for our Customers, SAFE AND REWARDING WORK for our People, and SUPERIOR RETURNS for our Shareholders.

VALUES

- **CUSTOMERS FIRST - ALWAYS.** Our Customer is the most important person in our business, to be treated with the utmost respect. No business activity, other than safety, is more important than listening, learning and providing superior product and service solutions to our Customers.
- **PEOPLE – THE FOUNDATION .** We are committed to the safety and success of our people. We expect the performance of every person to continually improve with personal initiative and proper support. We treat each other with mutual respect and have fun in our work.
- **INNOVATION - – THE BEST..** We are leaders not followers. Our company is built on a collection of innovative ideas and a passion for continuous improvement. We challenge the status quo and take measured risks, exploring big and small ideas that improve our performance daily. We provide innovative product and service solutions to our Customers.
- **TEAMWORK – WINNING TOGETHER..** We believe unity of purpose and teamwork enables us to do far more than we could individually. We draw strength from each other and communicate with fairness, candor, respect and courage – respectfully stating what we think even if it is unpopular. Our collaboration turns interesting ideas into great product and service solutions.
- **ACCOUNTABILITY – RIGHT NOW..** We say what we mean, and we honor our commitments. We hold ourselves and each other accountable for our results. We prefer action today versus tomorrow. We understand that value is created in our product development centers, our factories, and at our Customer's sites.
- **INTEGRITY – STEWARDSHIP COMMITMENT..** We are stewards of the long-term success of our business and our people. We are trustworthy and honest, and carry out

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our work in a professional, ethical, and legal manner. We challenge actions inconsistent with our values.

Global Ethics and Compliance Policy

STERIS plc (“STERIS” or the “Company”) requires all Associates within the STERIS plc group of companies to be lawful and ethically responsible in all business practices. We are devoted to sustaining a work environment that promotes honesty, integrity, respect, trust, diversity and responsibility. Above all, we are responsible for our actions and for adhering to ethical and legal rules. This Code of Business Conduct applies to STERIS plc and all of its subsidiaries and affiliates.

STERIS Workplace

STERIS Associates are expected to conduct themselves in a manner that is appropriate for the work environment and consistent with our values.

Prohibition of Harassment and Discrimination

The Company is committed to an environment free from harassment (including sexual harassment and bullying) and discrimination. As a result, it is the policy of STERIS to prohibit harassment or discrimination due to age, sex, gender, pregnancy, race, color, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status. It is also our policy to prohibit discrimination for any other legally protected characteristic.

Anti-Retaliation Policy

It is the policy of STERIS to not permit any form of retaliation against another individual for reporting a violation of this Code or any other STERIS policy. Acts of retaliation are considered a violation of the Code and are subject to disciplinary action appropriate to the situation.

Human Rights and Labor Rights

As described in our Human Rights and Labor Rights Policy, STERIS is committed to upholding human rights. We oppose and prohibit all forms of slavery, forced labor, child labor or any other form of coerced labor in our own operations, our supply chain and by our business partners. Every STERIS employee is responsible for reporting any conduct or practice that may violate this requirement to their supervisor and to the STERIS Compliance Department.

Following Laws and Regulations

STERIS Associates must comply with all applicable laws. It is the Company’s policy to understand and follow applicable laws and regulations in all locations where we do business. Every STERIS Associate is responsible for learning and following the appropriate laws and regulations. When we work within the letter of the law, we build trust between STERIS and the people with whom we do business.

Political Activity and Dealing with Government

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Most contributions to political candidates by corporations are prohibited or restricted in many countries, including Ireland and the United States. Under applicable law, Associates may make political contributions on an individual basis. Qualified Associates in the U.S. may participate in the STERIS Employee PAC on a voluntary basis. Associates may not, however, commit Company resources to political campaigns without approval from the STERIS Legal Department and the CEO.

STERIS Customers include governmental entities. The laws and regulations governing transactions with governmental entities impose special rules and requirements not usually found in transactions with private parties. Consult the STERIS Legal Department concerning potential commercial transactions with government entities.

Recruiting and employing former or current government officials or employees is also subject to special laws and possible restrictions. These rules may also apply to family members of the government official or employee. Contact the STERIS Legal Department concerning potential hires of government officials or employees.

Anti-Bribery and Anti-Corruption

Bribery and corruption are unlawful and are strictly prohibited by STERIS policy and this Code. STERIS Associates and others acting on STERIS's behalf are prohibited from authorizing, paying, promising or offering anything to any individual or entity in order to improperly influence any individual or entity in the conduct of business or to gain a business advantage. Any STERIS Associate who accepts or requests a bribe in connection with a transaction is also considered to have committed an unlawful act.

Bribery is offering, promising, giving, demanding, or accepting an inducement for an action that is illegal, corrupt, unethical or a breach of trust. Corruption is the misuse of public office or power for personal gain, or misuse of private position or authority in relation to STERIS business, whether governmental or not. Dealers, distributors and agents engaged by STERIS are bound by the same restrictions. Contact the STERIS Legal or Compliance Department with any questions or concerns regarding these laws and how to follow our policies that address them.

Anti-Trust and Competition Laws

It is imperative and in the best interest of STERIS that Associates engage only in lawful and ethical competitive practices. Generally, competitors may not agree or have an arrangement:

- On prices they charge, or other terms of sales, for goods or services, regardless of the economic impact
- On production volumes
- To avoid competing on bids or projects
- To refuse to deal or transact with select Customers or suppliers
- To divide or allocate Customers, territories, or markets

Contact the Legal Department if these issues are encountered or whenever any arrangement with a competitor is contemplated.

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Global Trade Compliance: Anti-Boycott and Trade Sanctions

When importing and exporting goods and services globally, we are responsible for compliance with various restrictions. STERIS is responsible for understanding and abiding by laws that prohibit doing business with certain entities, individuals, or countries where trade-restrictions are in place, and in complying with applicable anti-boycott regulations. STERIS Associates have the responsibility to remain watchful for the intended end-destination of our products and services. If trade practices are questioned, or if you have doubts about how to interpret the regulations for certain countries, contact the STERIS Legal Department.

Insider Trading Policy

STERIS Associates, senior managers, and directors are prohibited from engaging in transactions in the Company's securities while in possession of material non-public information and may also be prohibited from engaging in transactions during certain "blackout" periods. Providing (or "tipping") material non-public information to others is also prohibited. Examples of material non-public information include unpublished financial data, pending Company transactions (e.g., acquisitions, divestments), litigation developments, governmental investigations, and changes to business strategies. Failure to comply with this policy can lead to serious sanctions by the Company up to and including termination. For questions or clarification on the Insider Trading Policy, contact the STERIS Legal Department.

Interactions with Healthcare Professionals

In the course of conducting business, many STERIS Associates interact with healthcare professionals. We recognize that these interactions are subject to certain restrictions. Through our membership in industry trade associations, we agree to adhere to certain principles when interacting with healthcare professionals.

Among the industry trade associations with whom we have chosen to participate is the Advanced Medical Technology Association (AdvaMed). The Company is proud to be a supporter of AdvaMed's Code of Ethics on Interactions with U.S. Healthcare Professionals. Among other topics, the AdvaMed Code defines restrictions relating to gifts, entertainment, donations, meals and meeting locations when interacting with healthcare professionals. All STERIS Associates who interact with U.S. healthcare professionals must adhere to the AdvaMed Code. Questions about industry codes, including the AdvaMed Code, should be directed to the STERIS Compliance or Legal Departments.

Third Party Relationships

Relationships between STERIS and the entities with whom we do business, including Customers, suppliers, agents, distributors, and regulatory agencies are required to be ethical and in line with the principles outlined in this Code. Relationships with third parties, as well as all business decisions, must be based on what is required by ethical behavior, what is in compliance with law, and what is in the best interests of STERIS, and must not be motivated or influenced by personal considerations.

Conflicts of Interest

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STERIS Associates must avoid situations where their personal interests conflict, or appear to conflict, with the interests of the Company or its Customers. A conflict of interest exists when an Associate has a private, personal or commercial interest which is likely to influence or conflict with their duties at STERIS.

Examples of conflicts of interest include:

- Personal financial interests that might reasonably affect business judgment on behalf of STERIS
- Personal use of Company confidential information
- Other employment or business interests that adversely affects work performance for STERIS
- Gifts or entertainment that could reasonably be considered to improperly influence STERIS's business relationship with, or create an obligation to another Associate, Customer, supplier, or contractor.

Any activity an Associate partakes in that could potentially create a conflict of interest, or which could create the appearance of a conflict of interest, should be brought to the attention of the STERIS Internal Audit, Compliance or Legal Departments.

Protecting Company Assets

Accounting Information and Records Management

Laws are in place that require accuracy in the recording of all transactions, including sales of property, inventory or services. Any exchange of Company funds must be recorded within the framework of generally accepted accounting principles. Any transaction "off the record" is strictly prohibited. Destruction of any documents or records, especially of a financial nature, before the retention period expires is unlawful and subject to penalties.

Acts of falsifying records, nondisclosure of transactions, or destroying documents to avoid legal responsibilities are considered violations of the Code and can lead to civil or criminal liability. Contact the STERIS Accounting, Legal or Regulatory Departments if you have questions or concerns about recordkeeping requirements.

Intellectual Property and Confidential Information

STERIS Associates may have access to confidential or proprietary information owned by the Company. Such confidential information must not be disclosed to third parties without appropriate approvals.

Confidential information is information not generally known or readily available to others outside the Company. Examples of confidential information include technical know-how and data, trade secrets, business plans, marketing and sales programs, and sales figures. It also includes information related to mergers and acquisitions, stock splits, divestitures, licensing activities, and changes in senior management.

Personal information about STERIS Associates, such as salaries, benefits, and information contained in personnel files is also considered confidential. If you are not sure if you can disclose

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information to a third party, contact your supervisor or the STERIS Compliance or Legal Departments. Any inquiries from financial institutions, the media, or other third parties must be forwarded to the STERIS Corporate Communications or Legal Departments.

Quality and Marketing Integrity

All Associates must adhere to controls regarding product regulatory approvals, good manufacturing practice requirements, design, labeling, advertising, and other applicable controls. Marketing of STERIS products and services must be done honestly and with integrity, ensuring STERIS remains a trusted name and we continue to maintain our reputation as a reliable entity. False advertising of a product or inaccurately documenting a product's evolution is unethical and can lead to disciplinary action. For questions or concerns regarding product rules, consult with the STERIS Legal Department.

Health, Safety and the Environment

STERIS is committed to sustainability and to helping our Customers create a healthier and safer world. We are responsible for maintaining these principles for the good of our Associates and the community in order to be a good neighbor.

Environmental and health and safety laws are complex, subject to frequent changes, and vary from country to country. Abiding by these laws exhibits a respect for the environment and each other. Associates should seek the advice of an appropriate Health, Safety and Environmental Department Associate, or the STERIS Legal Department about the application of these laws and compliance with STERIS's policies, which may be more stringent than applicable laws.

Workplace Safety

All Associates of STERIS are responsible for the safety and well-being of themselves and their co-workers. We are all obligated to report actions or situations that are unsafe and to know how to proceed if we are involved in an unsafe act.

Furthermore, we are obligated to understand how to be safe at work and follow the appropriate policies and procedures. For example, we need to wear the appropriate personal protective equipment, know where exits are in case of fire, and be aware of who to call for help should a safety concern arise. Any hazardous or unsafe observations must be reported immediately to your supervisor and the appropriate Health, Safety and Environmental representative.

Sustainability

STERIS has focused on sustainable business practices for years, with much good work being done across our operations and around the world. Sustainability at STERIS centers around four key areas:

- Ethical Business Practices – We expect ethical behavior in all our dealings, which includes abiding by all laws and regulations when transacting business and act transparently.
- Energy and Conservation – We are committed to eliminating waste and using resources responsibly.
- People and Community – We engage Associates with meaningful work, continuous educational opportunities and personal assistance. We listen to our people's ideas and

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incorporate them into our processes. We are opposed to all forms of discrimination, harassment and violence.

- Environmental Health & Safety – We promote a safety culture throughout the Company. Everyone is accountable for the safety and well-being of each other. We are mindful of unsafe situations or environmentally unfriendly behaviors and minimize or eliminate them when we see them.

Privacy and Use of Social Media

Data Protection and Privacy

STERIS Associates who handle personal data must ensure data is processed in accordance with our policies and must report any suspected security incidents to their supervisor and the STERIS Data Protection Officer. It is the policy of STERIS to only process personal data in accordance with applicable law. Appropriate technical and organizational measures shall be taken against unauthorized disclosure or processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Personal data may be transferred by STERIS between jurisdictions for purposes outlined in our privacy policy and our Associate personal data protection notice. In such circumstances, STERIS will take all legally required measures to provide adequate protection to the personal data that is transferred.

Any questions relating to data protection and privacy should be directed to the STERIS Data Protection Officer at dataprotection@steris.com.

Use of STERIS Resources

STERIS resources, including e-mail, voice mail, computers, and documents are the property of the Company and may be monitored at any time in compliance with applicable laws. The privacy of communications transmitted through these means cannot be guaranteed. While the Company will take measures as required by law to respect the privacy of communications stored on STERIS resources, Associates should be diligent to not use these resources to transmit messages they do not wish STERIS to review.

Use of Social Media

Associates must understand that STERIS policies and requirements about communicating STERIS information are in effect when an Associate is “online,” to the same extent as they apply “offline”. The use of tools such as video, blogs, wikis, podcasts, and social networking still requires professionalism, transparency, ethical behavior and non-disclosure of proprietary information. For any questions about the appropriate use of social media as a STERIS Associate, please contact the Corporate Communications Department.

Disciplinary Action and STERIS Helpline

Code and Policy Violations

Violations of this Code, laws and regulations governing the Company’s business, or any other Company Policy or requirement may result in disciplinary action, including and up to termination.

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Where to go for Help

Questions or concerns may arise about the subjects discussed in this Code. For more clarity on these topics or answers to compliance questions or situations, or if you are unsure of “the right thing to do”, talk with your Supervisor. If you cannot effectively communicate your observation or compliance related matter by speaking with your Supervisor, please contact a representative of one of the following departments within STERIS:

- Human Resources
- Internal Audit
- Quality
- Compliance
- Legal

If reporting via the channels listed above is not feasible, compliance related issues can be reported by phone or online via:

- STERIS Integrity Helpline
- STERIS Integrity Webline

The STERIS Integrity Helpline and STERIS Integrity Webline are communication channels you can use if you feel you cannot effectively communicate your observation or compliance related matter by speaking with your supervisor or the departments listed above. However, the STERIS Integrity Helpline and Webline do not replace traditional communication channels already in place. If you feel you can go to your supervisor or Human Resources department, you are encouraged to do so as this is often the most effective way of making your concerns known and getting the help you need.

For matters reported in good faith, reports made on the STERIS Integrity Helpline and Webline are made without retaliation. To help the Company fully investigate matters accurately and quickly, you are encouraged to provide the details of your concern. You also have the option to remain anonymous. The important matter is to speak up and report any violation of our Code. Details on how to use the Helpline and Webline are detailed below for reference.

Integrity Helpline Reporting

To report unethical or compliance related issues over the phone, you may use the STERIS Integrity Helpline by dialing the phone number for the country in which you are located. NAVEX Global, our third-party administrator of the Helpline, uses an International Toll-Free Service for our calls. There are exceptions, such as Costa Rica and India, where an AT&T Direct System is used, and dialing is a two-step process. See below for details.

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Integrity Helpline Phone Numbers

Australia <u>Helpline:</u> (Optus) 1-800-551-155 (Telstra) 1-800-881-011 <u>Access Code:</u> 844-627-6887	Austria <u>Helpline:</u> 0-800-200-288 <u>Access Code:</u> 844-627-6887	Belgium 0800-81-992	Brazil 0800-047-4167	Canada 1-855-326-9721
China 400-9-906-644	Costa Rica <u>Helpline:</u> 0-800-011-4114 0-800-225-5288 0-800-228-8288 <u>Access Code:</u> 855-607-8702	Czech Republic 0800-050-195	Finland 0800-774282	France 0805-54-24-77
Germany 0800-7243728	Greece <u>Helpline:</u> 00-800-1311 <u>Access Code:</u> 844-627-6887	Hong Kong <u>Helpline:</u> 800-93-2266 <u>Access Code:</u> 844-627-6887	Hungary 06-800-21-501	India <u>Helpline:</u> 000-117 <u>Access Code:</u> 855-607-8702
Ireland 1800-800725	Israel <u>Helpline:</u> (Golden lines) 1-80-922-2222 (Barak) 1-80-933-3333 (Bezeq) 1-80-949-4949 <u>Access Code:</u> 844-627-6887	Italy 800-902-931	Japan <u>Helpline:</u> (NTT) 0034-811-001 (KDDI) 00-539-111 (Softbank Telecom) 00-663-5111 <u>Access Code:</u> 844-627-6887	Malaysia 1800-88-5782
Mexico 01-800-253-0492	Netherlands 0800-020-0849	Singapore 1800-622-7295	Slovak Republic 0800-141-665	Slovenia 080828025
South Africa 0800-167452	Spain 900-822-590	Switzerland 0800-001-311	Thailand 1800-011-569	United Arab Emirates <u>Helpline:</u> 8000-021 (du) 8000-555-66 (Military-USO and cellular) 8000-061 <u>Access Code:</u> 844-627-6887
United Kingdom 0800-028-3391	United States 1-855-326-9721			

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Toll-Free Service

1. Dial your country/carrier specific telephone number. This is a free call.
2. You can opt to give your report in English or your native language. You will hear a recorded message in your native language explaining the call process.
3. An English-speaking representative will begin the process. He or she will then bring into the conference call a translator who speaks your native language to assist you in completing your report.

AT&T Direct Service (Australia, Austria, Costa Rica, Greece, Hong Kong, India, Israel, Japan, and United Arab Emirates)

1. Dial your country specific telephone number to reach AT&T.
2. When prompted, enter your country's assigned access code, as listed above, to connect to NAVEX Global.
3. You can opt to give your report in English or your native language. You will hear a recorded message in your native language explaining the call process.
4. An English-speaking representative will begin the process. He or she will then bring into the conference call a translator who speaks your native language to assist you in completing your report.

Integrity Webline Reporting

If you cannot effectively communicate your observation or compliance related matter by speaking with your Supervisor, Human Resources, Internal Audit, Compliance or Legal Department, compliance related issues can be reported online via the STERIS Integrity Webline at: www.reportlineweb.com/Steris

Conclusion

STERIS is committed to our Associates and the entities with which we do business. The Company trusts Associates to remain honest, respectful, and responsible in all business conduct. This Code summarizes the ethical expectations for conduct that all Associates must understand and practice. Additional policies supporting this Code are available to all Associates. For any questions or clarifications, contact your supervisor, another member of STERIS's management, or one of the departments listed above for guidance.

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