

Statement on Human Trafficking and Slavery for 2019

STERIS strongly opposes all forms of slavery, servitude, forced labor, child labor and human trafficking. The Company recognizes that human trafficking and slavery can occur in many forms. References in this Statement to "human trafficking and slavery" are intended to encompass any form of coerced labor. This Statement sets out the steps that STERIS, including STERIS plc and, with its direct and indirect wholly-owned subsidiaries ("the Company"), has taken to prevent human trafficking and slavery in their businesses and supply chains in fiscal 2019.

STERIS is a leading provider of infection prevention and other procedural products and services. OUR MISSION IS TO HELP OUR CUSTOMERS CREATE A HEALTHIER AND SAFER WORLD by providing innovative healthcare and life science product and service solutions around the globe. STERIS offers its Customers a unique mix of innovative capital equipment products, such as sterilizers and washers, surgical tables, lights and equipment management systems and connectivity solutions such as operating room integration; consumable products such as detergents and gastrointestinal endoscopy accessories and other products; services, including equipment installation and maintenance, microbial reduction of medical devices, instrument and scope repair solutions, laboratory services and outsourced reprocessing. STERIS manufactures, sources, and provides services and solutions to its Customers globally. The Company's supply chains include thousands of suppliers and are extensive and complex.

The Company has implemented and maintains systems and processes to avoid complicity in human trafficking and slavery related to our operations and those of our affiliates and subsidiaries, as well as any such activity occurring in our supply chains or the supply chains of our affiliates.

The Company maintains a Code of Business Conduct ("Code"), which requires all employees, among other obligations, to act lawfully, ethically, and responsibly in all of their business practices, and to comply with applicable laws. New employees are required to acknowledge their understanding of the Code and commit to adhering to the Code's policies. The Company requires all employees to participate in a training program every other year and to attest to their understanding of, and adherence to, the Code.

The Code also specifically provides that a failure by any employee to comply with laws or regulations governing the Company's business or the Code may result in disciplinary action, termination, and if warranted, legal proceedings, and provides for communication channels to be utilized in case of any violations. To further encourage compliance and the reporting of violations, the Company maintains an Integrity Helpline (reporting system) and website,

available to employees as well as Customers, suppliers and all other business partners of STERIS. A strict anti-retaliation policy is followed, and reports may be made anonymously. All reports are promptly addressed by the Company's ethics committee and reviewed each quarter by the Compliance Committee of STERIS plc's Board of Directors. STERIS has not received any reports with respect to our businesses regarding human trafficking or slavery.

The Company has no reason to believe that any human trafficking or slavery is occurring in any of the Company's businesses. Nonetheless, the Company has taken the following steps to detect and prevent any violations of applicable human trafficking and slavery laws or conditions that may give rise to a violation:

- A dedicated Compliance team is responsible for effecting and maintaining business processes, employee and supplier training programs, and vigilant monitoring, including to ensure adherence to applicable human trafficking and slavery laws.
- STERIS is a member of the [Slavery & Trafficking Risk Template \("STRT"\)](#) Development Committee, operating under the Social Responsibility Alliance (SRA) initiative, which is a consortium of organizations working in tandem to ensure respect for human rights. Through our participation with the SRA, STERIS is working to identify and address risks of modern slavery, especially throughout its global supply chain. The Company is utilizing the STRT, which is developed by the STRT Development Committee, to survey its suppliers for risk of human trafficking and slavery. This tool engages suppliers in the risk assessment process and, in doing so, helps STERIS foster constructive dialogue and raise supplier awareness of its commitment to tackling modern slavery risk.
- Training and education materials focusing on human trafficking and slavery, including stated obligations of both the Company and its supply chain partners, have been made available to suppliers in conjunction with the STRT surveys. Those suppliers whose responses to the STRT survey indicated a higher risk of human trafficking and slavery were notified of their risk rating and instructed to complete an online training module related to human trafficking and slavery laws.
- The Company reserves the right to audit its supply chain as appropriate. The Company's network of suppliers and sub-suppliers, given its fragmented nature, offers a relatively higher risk of exposure to violations. STERIS's continued and increasingly vigilant engagement with its supply base will enhance transparency and assist in compliance with the applicable human trafficking and slavery laws.
- A Company-adopted Policy on Human Trafficking and Slavery (the "Policy") has been communicated to all employees and expressly prohibits human trafficking or slavery in any form. The Policy includes examples of specific practices that are prohibited and can be found by employees on the STERIS intranet. In addition, The STERIS [Human Rights and Labor Rights Policy](#), which is accessible via the STERIS website, communicates STERIS's recognition and appreciation of our responsibility to employee health and safety, freedom of association, labor standards, equal employment, security, and privacy.

- A [Supplier Code of Conduct](#) defining requirements and expectations for ethical behavior by the Company's suppliers and business partners, and requiring compliance with applicable laws, including human trafficking and slavery laws, appears prominently on the STERIS internet site for viewing by the Company's suppliers. STERIS suppliers found to be in violation of the Supplier Code of Conduct are subject to disciplinary action, up to and including termination of the business relationship.
- The Company assessed its internal labor practices in 2019 by surveying operations in Europe, Latin America, and Asia, including, but not limited to, any practices involving the engagement of labor through recruiters and the hiring of temporary employees. The internal assessment indicated compliance with applicable human trafficking and slavery laws.
- The Company will not work with any organization it finds to be knowingly involved with human trafficking or slavery. STERIS encourages everyone, including employees, contractors and suppliers, to report in good faith any issues or concerns regarding human trafficking or slavery.

STERIS Directors and Senior Management are responsible for ensuring that the activities of the Company continue to comply with applicable human trafficking and slavery laws. To this end, STERIS will continue to provide adequate resources, the commitment of its employees, training, and investment to ensure compliance.

This statement was adopted and approved by the Board of STERIS IMS Limited on 20 September 2019.



Michael Tokich

Director