



## **Code of Business Conduct**



## ***A Message from Dan Carestio, President & CEO***

*The STERIS Code of Business Conduct (“The Code”) is the cornerstone for how we conduct ourselves as Associates and how we interact with our Customers, suppliers, communities and each other. The Code defines our standards of ethical behavior. At STERIS, Integrity is a core value and we are committed to carrying out our work in a professional, ethical and legal manner. The Code provides guidance on how to engage in a manner that reflects our ethics and values. It also provides direction on where to go if you have questions and how to report concerns. 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, understand and adhere to The Code, and are responsible for speaking up if we are aware of activities which do not adhere to The Code.*

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





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## Introduction

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The Code applies to every officer, director, manager and employee (collectively, "Associate") of STERIS plc and its subsidiaries and affiliates (collectively, "STERIS" or the "Company"). STERIS requires all business activities to be conducted in a lawful and ethically responsible manner.





# MISSION

WE HELP OUR CUSTOMERS CREATE A HEALTHIER AND SAFER WORLD by providing innovative healthcare and life science products and services around the globe.



# VISION

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WE STRIVE TO BE A GREAT COMPANY. We provide world-class products and services for our Customers, safe and rewarding work for our People, and superior returns for our Shareholders.

# VALUES

## 1 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 products and services to our Customers.







## 2

### 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.



**3**  
**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 quality, delivery and cost performance daily. We provide meaningful value to our Customers with our products and services.





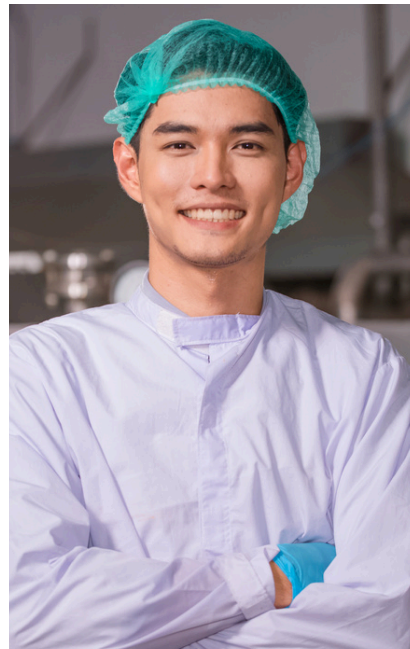
**4**  
**TEAMWORK**  
**WINNING**  
**TOGETHER**

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 offerings.



**5**  
**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.







**6**  
**INTEGRITY**  
**STEWARDSHIP**  
**COMMITMENT**

We are stewards of the long-term success of our business – we create superior value for our people and our shareholders. We are trustworthy and honest, and carry out our work in a professional, ethical and legal manner. We challenge actions inconsistent with our values.





# Ethical Decision Making & Expectations



The Code cannot cover all ethics-related scenarios you will encounter throughout your career at STERIS. Our Associates are responsible for utilizing their best judgement and to understand when to ask for assistance. If you find yourself in a scenario that presents an ethical dilemma, you must:

- ✓ **Stop** and think about the situation and any ethical implications before action is taken;
- ✓ **Review** any applicable policies and procedures and the Company’s mission, vision and values;
- ✓ **Ask** if you are still uncertain of what action to take.





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

- ✓ Comply with all applicable laws and regulations;
- ✓ Read, understand and abide by The Code and applicable policies;
- ✓ Timely complete any required ethics and business conduct training by communicated due dates;
- ✓ Utilize STERIS resources responsibly and for work related purposes;
- ✓ Report actions or situations that are unsafe and know how to proceed if you are involved in or observe an unsafe situation.

Avoid and report any situations where personal interests conflict, or appear to conflict, with the interests of the Company or its Customers. Conflicts of interest include but are not limited to situations such as personal financial interests that might affect business judgement, use of confidential information, other employment, membership or business interests that adversely affect work performance and abuse of power or influence for personal gain;

- ✓ Conduct business with reputable suppliers that comply with the STERIS Supplier Code of Conduct;
- ✓ Report potential issues of non-compliance in accordance with The Code;
- ✓ Cooperate fully with any audit, inquiry, or investigation undertaken at the Company's discretion; and
- ✓ Speak up if there is a potential violation of the law, The Code or STERIS policy. STERIS prohibits retaliation against anyone who reports a matter in good faith.



# Sustainability

STERIS focuses on sustainable business practices which center 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 acting transparently.



## Energy & Conservation

We are committed to eliminating waste and using resources responsibly.

## People & Community

We engage Associates with meaningful work and continuous educational opportunities. We listen to our people's ideas and incorporate them into our processes.



## 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.





# Associate Well-being

## Anti-Harassment & Discrimination

STERIS strives to create an environment free from harassment and discrimination based on all applicable legally protected characteristics. Harassment and discrimination of such characteristics are prohibited.



## Preventing Modern Slavery

As outlined in our policies, STERIS opposes all forms of slavery, servitude, forced labor and human trafficking and prohibits modern slavery in its operations, in its supply chain and by our business partners around the globe. STERIS maintains labor standards including hours, conditions, wages, and overtime pay practices that comply with the laws of the jurisdictions in which we operate.

## Avoiding Workplace Violence

STERIS has a zero-tolerance policy as it relates to workplace violence, including acts and threats of physical violence or any threatening, disruptive behavior at work.



# Belonging, Diversity & Inclusion

At STERIS, people are the key to our success. Our goal is to build and foster a global culture that reflects our commitment to Diversity, Equity and Inclusion (DE&I) where there is a deep sense of purpose, pride, camaraderie and belonging among our Associates. We are unified by our shared commitment in these key areas:



## Teamwork

We believe unity of purpose and teamwork enables us to do far more than we can individually. We draw strength from each other and find value in the diversity of perspectives, experiences and ideas of our global Associates. We communicate with fairness, candor, respect and courage.

## Diversity

We build and grow diverse teams through recruiting, developing and retaining talented individuals with diverse backgrounds and experiences. Our path to success includes the understanding that internal representation should be reflective of the communities in which we operate.

## Culture

We strive to create and sustain an inclusive environment where Associates feel safe and empowered to share their thoughts, perspectives and ideas. In doing so, we demonstrate respect and appreciation of individual, cultural, and other identity-based differences while valuing and acknowledging unique skills, experiences and backgrounds.



## Following Laws & Regulations

Global laws and regulations are complex, dynamic, and differ across countries. Each Associate must comply with all laws and regulations relevant to their role in every location where STERIS does business. In some cases, Associates outside the U.S. must follow both U.S. and local laws, even for activities conducted abroad. Some of these areas include, but are not limited to:



### Anti-Bribery & Anti-Corruption

Laws around the globe prohibit bribery, including but not limited to the Foreign Corrupt Practices Act and the UK Bribery Act. Associates and others acting on our behalf are prohibited from authorizing, paying, promising, or offering anything to any individual or entity or from misusing authority for personal gain to improperly influence any individual or entity in the conduct of business or to gain a business advantage.

### Health, Safety & the Environment

Environmental, 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. As such, STERIS policies may be more stringent than applicable laws and must be understood and followed.



### Intellectual Property, Confidential Information & Trade Secrets

Associates may have access to confidential or proprietary information owned by the company or those we conduct business with. Confidential information should not be shared with third parties or other Associates unless there is a legitimate need to know and appropriate approval has been obtained. Understand that policies and requirements about communicating STERIS information are in effect when an Associate is "online", to the same extent as they apply "offline", whether in relation to social media or any other communication format.

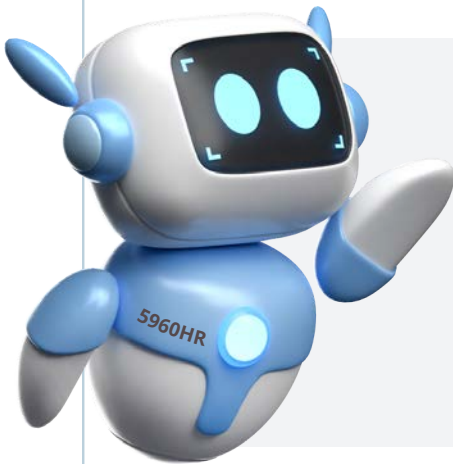
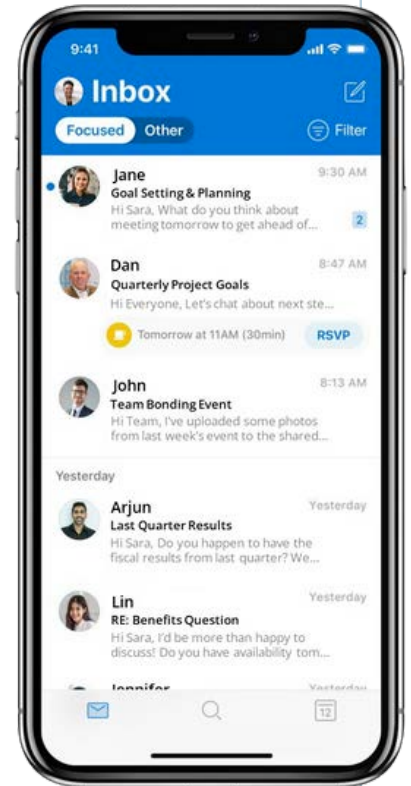




## Data Protection & Privacy

Personal data must be processed in accordance with our policies and local laws. Appropriate technical and organizational measures shall be taken against unauthorized disclosure, processing, loss or destruction of personal data controlled by STERIS. Any suspected security incidents must be immediately reported. Personal data may be transferred by STERIS between jurisdictions for purposes outlined in our policies and our Associate Personal Data Protection Notice.

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. Any questions relating to privacy should be directed to the STERIS Data Protection Officer at [dataprotection@steris.com](mailto:dataprotection@steris.com). Associates must respect the confidentiality of information about our fellow Associates, Customers and key stakeholders and follow all relevant privacy laws.



## Ethical Artificial Intelligence Usage

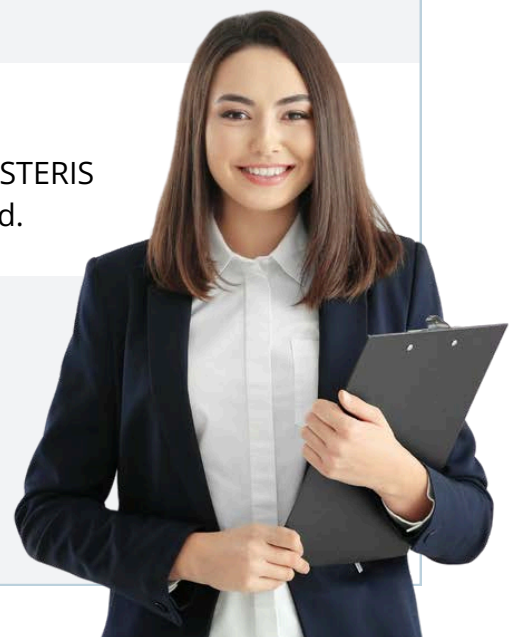
STERIS requires the responsible, ethical and secure use of Artificial Intelligence while conducting business on its behalf. AI tools that enhance productivity and promote innovation are subject to review and approval by management, Information & Technology, Legal and Data Privacy prior to use.

## Fraud

STERIS establishes and monitors controls to prevent fraud. STERIS expects all Associates to report any instances of known fraud.

## Global Trade Compliance

When importing and exporting goods and services globally, we have a responsibility to remain watchful for the end destination and be mindful of any anti-boycott or trade sanctions.



## Anti-Trust & Competition Laws

Associates must engage only in lawful and ethical competitive practices. 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.



## Accounting Information & Business Records Management

Laws are in place that require accuracy in the recording of all transactions, including sales of property, inventory or services. Acts of falsifying records, transactions “off the record”, nondisclosure of transactions, or destroying documents to avoid legal responsibilities can lead to civil or criminal liability.

## Quality

Adhere to quality controls regarding product regulatory approval and good manufacturing practice requirements. Marketing of STERIS products and services must be done honestly and with integrity.



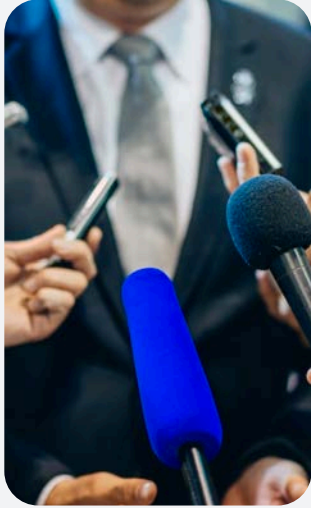
## Insider Trading

All STERIS Associates 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.



## Dealing with Government & Political Activity

Contracting with government entities is integral to STERIS's business. STERIS and its representatives must comply with all applicable laws and regulations regarding government contracts and relationships with government officials globally. Associates must adhere to STERIS policies to ensure compliance with these special requirements.



**Payments, Gifts, Meals and Gratuities:** In general, Associates may not give or offer to give anything of value (including gifts, gratuities, meals, entertainment, travel, etc.) to government officials, its employees, or agents.

**Recruitment:** Associates may not discuss employment with current or former government officials without Legal Department approval.

**Cost Recording:** Associates must follow reporting procedures and maintain proper and accurate records for costs allocated to government contracts.

**Political Contributions:** Corporate contributions to political candidates are often restricted or prohibited. Use of STERIS resources for political campaigns requires approval from the Legal Department and the CEO. Associates may make voluntary political contributions individually or, if qualified, through the STERIS Employee Political Action Committee.

## Interactions with Healthcare Professionals

We should never attempt to inappropriately influence a healthcare professional to buy, use, or recommend our products. Exercise increased caution when interacting with Healthcare Professionals. These interactions are subject to various laws and regulations and trade industry association ethical codes. STERIS adheres to the principles outlined in all regional industry codes on interactions such as the Advanced Medical Technology Association (AdvaMed), APACMed, MedTech Canada, MedTech Europe and more. Copies of these codes are available online.





harassment  
fraud  
bullying

# Speak Up

corruption  
conflict of interest  
discrimination

**If you observe any potentially unethical or illegal activities,  
*Speak Up!***

**Report your concern to your Supervisor, another Manager,  
Human Resources, Global Compliance, Internal Audit, or Legal,  
or use the STERIS Integrity Helpline via phone or web form.**



**GET HELP  
24/7 VIA  
PHONE OR  
WEB FORM**

Navex Global is an independent reporting service. When you contact them, you do not have to give your name. A customized web form or professional interview specialist will document your concern and relay the information to our organization for follow-up.

# Reporting, Investigations & Resolutions

## Reporting Responsibility

Associates have a responsibility to “Speak Up” and report any known or suspected violation of The Code.

### Reporting

Associates can raise concerns or make a report via multiple channels, including directly with their Supervisor. All Supervisors have a responsibility to appropriately handle or escalate concerns, reports or allegations. Reporting channels may include:

- Your Supervisor
- Another Manager
- Human Resources
- Global Compliance
- Internal Audit
- Legal
- [The STERIS Integrity Helpline](#)



You can make an anonymous report through the STERIS Integrity Helpline. Should you willingly disclose your identity, it will be kept confidential to the fullest extent possible.

### Anti-Retaliation

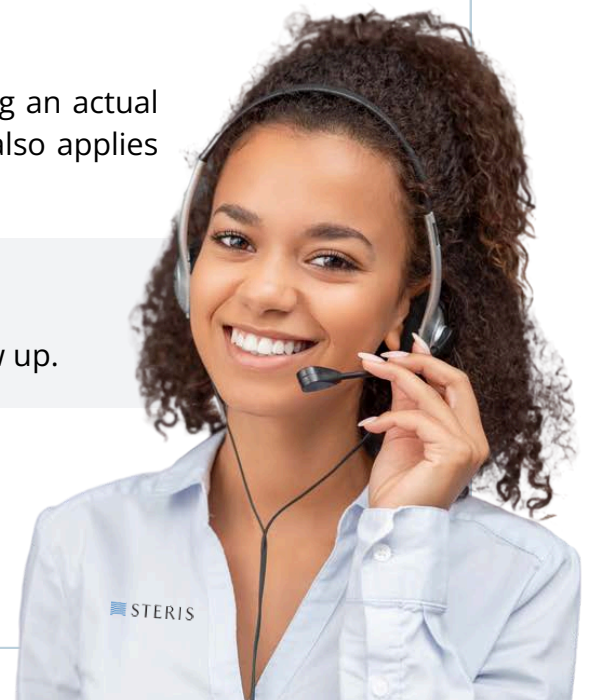
STERIS prohibits retaliation against anyone for reporting an actual or suspected violation of The Code in good faith. This also applies to Associates assisting with an investigation.

### Investigations

Reports are promptly investigated for response or follow up.

### Resolutions

Substantiated reports are resolved through prompt and appropriate action. If appropriate, and to the extent we are able, STERIS will inform a reporter of the resolution.



## Non-Compliance

Associates who fail to comply with The Code may be subject to disciplinary action, including termination. Certain violations of The Code may result in personal civil and criminal liability.



## 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. Policies supporting The Code are available via the STERIS intranet.



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