GLOBAL CODE OF CONDUCT

OUR VALUES
OUR COMMITMENT
OUR CODE

May 2018
We are pleased once again to present you with our Hill-Rom Global Code of Conduct, one of the most important tools we have in advancing our mission of enhancing outcomes for patients and their caregivers.

Integrity is one of our most deeply held values as a company, and it is at the center of our Hill-Rom Commitment. Our company’s continued growth and ability to meet our commitment to patients are dependent upon the integrity of our people. Ensuring that every day, around the world, we focus on driving results in a responsible and compliant way is imperative for both our success today and our ability to grow in the future.

Compliance must not only be what we do – it must be who we are as a company and as individuals. That is why we say integrity starts with each and every one of you. Compliance should be at the forefront of how we conduct business – with every colleague, every day, in every situation and circumstance. Each decision that you make in your daily work can either solidify or harm the trust placed in our products and our company. It takes many years to build a good reputation and to become a company that people trust. That reputation and trust must be safeguarded.

Given the vital importance of compliance, and in keeping with our commitment to continuous improvement, the Global Compliance Office is always working to solidify our global compliance program. The Global Code of Conduct is intended to provide each of us with a practical set of principles, policies and procedures to navigate the complex and highly regulated world of health care. The Global Code of Conduct is a roadmap to ensure we operate in compliance with all laws and regulations and that we hold ourselves to the highest standards of business conduct.

Each year, each of us must read the Global Code of Conduct and agree to follow its guidance. We ask that you give this your full attention and that you then seek further guidance on topics that are not clear to you. We encourage you to voice any concerns that may arise or to ask questions. We maintain a non-retaliation environment that allows you to make good faith reports without fear of retaliation or intimidation. The Global Code of Conduct and the Global Compliance Office together represent an invaluable source of insight and support available to each of us.

Thank you for your commitment to compliance and for your hard work on behalf of the patients and caregivers we serve.

Sincerely,

Ilana Shulman
Chief Compliance Officer

A Message from
John Groetelaars & Ilana Shulman

“COMPLIANCE MUST NOT ONLY BE WHAT WE DO – IT MUST BE WHO WE ARE AS A COMPANY AND AS INDIVIDUALS. THAT IS WHY WE SAY INTEGRITY STARTS WITH EACH AND EVERY ONE OF YOU.”
One Hill-Rom: Our Core Values Statement

We Do Our Jobs with INTEGRITY
At Hill-Rom, integrity means adhering to the highest ethical standard in everything we do. By promoting an environment of openness and trust through honest communications, we remain proactive and manage the global risks that we face.

We Treat People with RESPECT
We treat each other and our stakeholders with respect. We demonstrate our respect every day by working safely, raising concerns when we have them and embracing a global, diverse and inclusive team.

We Strive for RESPONSIVENESS
Demonstrating our passion for the evolving needs of our patients, caregivers and customers means that we work with a focused sense of urgency. We communicate openly and honestly. We act together as one unified team in all that we do.

We Uphold Our Promises and See RESULTS
We maintain high standards of quality and focus on continuous improvement while growing our business. We encourage innovation while adhering to our principles and producing results.

We Work Hard and Have FUN
We have fun, celebrate our victories and inspire each other while never compromising our other values to meet our goals. Together we accomplish great things and have fun along the way.

THIS IS OUR DNA – WHO WE ARE. INTEGRITY, RESPECT, RESPONSIVENESS, RESULTS, AND FUN ARE WHAT WE PRIDE OURSELVES ON.
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Introduction

The Hill-Rom Global Code of Conduct ("the Global Code") applies our values to the business situations we face daily. It guides our interactions with each of Hill-Rom’s key stakeholders: our customers and patients, our fellow employees, our company and investors, and the global community.

Purpose

Following the letter and spirit of the Global Code, and our policies and procedures is critical to our continued success in a highly complex health care industry. Our reputation depends on the actions and decisions made by each of us every day. Observing the Global Code helps us both comply with applicable laws and regulations and inspire the trust and confidence of our key stakeholders.

Applicability

The Global Code and all relevant company policies and procedures apply to everyone who conducts business for Hill-Rom. This includes employees, officers and directors, agents, vendors, suppliers and consultants worldwide. Each of us is responsible for knowing and complying with the standards set forth in the Global Code.

Understanding Our Shared Responsibilities

Holding ourselves to the highest standards of integrity means that we are all expected to read, understand and comply with all company policies and applicable global laws and regulations. In situations where customary conduct is at odds with the Global Code, a policy, or local laws or regulations, we must comply with the stricter standard.

The Global Code cannot anticipate every situation we may face. It is designed to identify major issues we may commonly confront and to provide guidance on those issues. The Global Code’s clear direction allows us to act quickly and with confidence that our responses are appropriate and consistent with the Global Code and our values. If you encounter a situation not discussed in the Global Code, ask questions and seek answers.

Additional Responsibilities for Managers

We are all expected to follow the Global Code, but managers have a responsibility to lead by example. Doing so helps our team remain action-oriented and sets the tone that we are one team, yet individually responsible for appropriately managing our Company’s many global risks. Managers must set the highest standards of business conduct. If you are a manager, you must:

- Inspire compliance and personal accountability in others and be responsive to questions and concerns
- Ensure that your employees understand their responsibilities under the Global Code, company policy and procedures, and relevant laws and regulations
- Create an “open-door” environment where your direct reports and other employees feel comfortable asking questions, voicing concerns or reporting perceived misconduct
- Act promptly and involve the appropriate people, including your manager and the Global Compliance Office, when a perceived, potential or actual violation of the law, the Global Code or our ethical commitments arises, and
- Be mindful of integrity and compliance as factors when setting goals for and evaluating employees

Our Expectations Under the Global Code

Under the Global Code

The Hill-Rom Global Code of Conduct ("the Global Code") applies our values to the business situations we face daily. It guides our interactions with each of Hill-Rom’s key stakeholders: our customers and patients, our fellow employees, our company and investors, and the global community.

Our Reputation depends on the actions & decisions made by each of us every day.

Make a Report Online  Email the Compliance Office  Call the Compliance Office

Call the Compliance Office

Email the Compliance Office

Make a Report Online

Call the Compliance Office
Addressing Our Questions & Concerns

If you are ever unsure whether an action or decision is ethical and acceptable under the Global Code, ask yourself:

Am I adhering to the spirit and meaning of all applicable laws as well as the Global Code and company policies?

Y ES

Do my actions embrace the highest standards of all of our core values?

Y ES

Is my decision responsible and does it demonstrate my honesty, accountability and transparency in pursuing company goals?

Y ES

Would my family and colleagues be proud if my actions were reported in the news?

Y ES

Proceed; based on your responses, this action or decision is ethical and acceptable under the Global Code.

If the answer to any of these questions is not a resounding “YES,” you should reconsider the action and seek guidance immediately.

Non-Retaliation at Hill-Rom

We act swiftly and responsively when we know or believe there is a legal or ethical risk to Hill-Rom. Everyone at Hill-Rom has an obligation to voice concerns or file a report through the appropriate channels. While it can sometimes be difficult to come forward with concerns, be assured that your concerns or questions will be treated fairly and with the utmost respect.

Hill-Rom maintains a strict non-retaliation policy to encourage open communication, and anyone who raises a good faith concern or question about business practices or non-compliance with the Global Code or company policies and procedures will be protected from retaliation. A “good faith” report means that an individual has raised an issue that he or she honestly believes may be in violation of this Global Code, company policies and procedures, or the law.

For more information, refer to the Compliance Reporting and Non-Retaliation Policy.

Compliance Resources

When seeking guidance first consult this Global Code as well as any relevant policy or procedure that is available on our company intranet. These resources should provide additional information and clarification about a topic.

If you still have questions, you should consult with your manager or one of the resources identified below. In most cases, your manager is in the best position to address any questions or concerns. If you are not comfortable speaking with your manager, you can speak with another Hill-Rom manager.

Available resources include:

Human Resources
For employment or employee-related issues, such as questions or concerns about potential discrimination or harassment or concerns about management, please contact the Human Resources Department.

Legal Department
For questions about laws and regulations that may apply to our business, please contact the Legal Department. There are lawyers assigned to support each business within the company as well as subject matter experts who can assist you.

Finance Department
For questions regarding finance or accounting issues, please contact the finance representative for your team.
Global Compliance Office

The Global Compliance Office is available to assist you with any questions or concerns regarding the Global Code or company policies and procedures. It is a valuable resource in situations where you are more comfortable speaking with someone other than your manager.

Compliance Helpline

You may also make a report, including concerns of actual or potential misconduct, through our Compliance Helpline, which is managed by an independent third party. The Compliance Helpline is accessible 24 hours a day, seven days a week, with translators available when necessary. Where allowed by local law, you may choose to make an anonymous report through the Compliance Helpline.

Hill-Rom treats reported information in a confidential manner to the extent allowed by local laws, and we will always uphold our commitment to our non-retaliation policy.

You may use any of the following methods to submit a report to the Compliance Helpline:

- Call your location’s Compliance Helpline at the toll-free telephone numbers on the following page.
- Call the Compliance Office
- Email the Compliance Office
- Make a Report Online

Compliance Helpline International Toll-Free Telephone Numbers

<table>
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<th>Country</th>
<th>Number</th>
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<tr>
<td>U.S.</td>
<td>1-866-433-8442</td>
</tr>
<tr>
<td>Australia</td>
<td>1-800-339-276</td>
</tr>
<tr>
<td>Austria</td>
<td>0800-291870</td>
</tr>
<tr>
<td>Belgium</td>
<td>0800-77004</td>
</tr>
<tr>
<td>Brazil</td>
<td>0800-892-0805</td>
</tr>
<tr>
<td>Canada</td>
<td>1-866-433-8442 (English) or 1-855-350-9393 (French)</td>
</tr>
<tr>
<td>China (Northern)</td>
<td>10-800-712-1239</td>
</tr>
<tr>
<td>China (Southern)</td>
<td>10-800-120-1239</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>800-142-550</td>
</tr>
<tr>
<td>France</td>
<td>0800-902500</td>
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<tr>
<td>Germany</td>
<td>0800-1016582</td>
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<tr>
<td>Hong Kong</td>
<td>800-964214</td>
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<tr>
<td>India</td>
<td>000-800-100-1071</td>
</tr>
<tr>
<td>Italy</td>
<td>800-786907</td>
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<tr>
<td>Ireland</td>
<td>1-800-61-5403</td>
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<tr>
<td>Japan</td>
<td>00531-121520 (Japanese) or 0066-33-11-2505 (English)</td>
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<tr>
<td>Lebanon</td>
<td>01-426-801</td>
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<tr>
<td>Malaysia</td>
<td>1-800-81-8690</td>
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<tr>
<td>Mexico</td>
<td>001-8008407907 (Spanish) or 001-866-737-6850 (English)</td>
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<tr>
<td>Netherlands</td>
<td>0800-0226174</td>
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<tr>
<td>Norway</td>
<td>800-15654</td>
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<tr>
<td>Poland</td>
<td>0-0800-121-15-71</td>
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<tr>
<td>Portugal</td>
<td>800-8-12-499</td>
</tr>
<tr>
<td>Russia</td>
<td>8-10-8002-603011</td>
</tr>
<tr>
<td>United Arab Emirates</td>
<td>8000-021</td>
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<tr>
<td>Saudi Arabia</td>
<td>1-800-10</td>
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<tr>
<td>Singapore</td>
<td>800-1204261</td>
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<tr>
<td>South Africa</td>
<td>0800007785</td>
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<tr>
<td>Spain</td>
<td>900-991498</td>
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<td>Sweden</td>
<td>020-79-8729</td>
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<tr>
<td>Switzerland</td>
<td>0800-562907</td>
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<tr>
<td>Turkey</td>
<td>0811-288-0001</td>
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<tr>
<td>United Kingdom</td>
<td>08-000328483</td>
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These numbers are subject to change. If a local number is not working, please log on to http://www.hill-rom.EthicsPoint.com to file a report.

Contact the Global Compliance Office

GlobalComplianceOffice@Hill-Rom.com
1-877-638-8093 (toll-free phone number within North America)
CUSTOMERS & PATIENTS

The patients who use our products, their caregivers and our other customers are at the heart of our business. They depend on us for the delivery of high quality cost-effective products and services to meet their needs. For this reason, every interaction we have with health care providers, patients, payers and other customers is an opportunity to demonstrate our commitment to enhancing patient and caregiver outcomes.

For more than 85 years, we have nurtured our long-standing relationships with a broad range of customers. We must work to build and maintain the trust and positive relationships we have established with our customers.
Accurate and Truthful Communications

We market and sell our products solely based on their effectiveness, quality, safety and price. All information provided to our customers and patients about our products and services, including availability and delivery of our products, must be truthful, balanced and supported by data and relevant experience. Materials created for marketing and selling our products must be reviewed and approved through the appropriate Legal and Regulatory Affairs approval process.

Creating High Quality, Innovative Products

We all must work to provide products that are safe and effective for their intended uses. To do this, we must:

- Design, validate, test and evaluate our products to meet current industry standards and maximize patient safety and outcomes
- Manufacture and service our products in compliance with our standard operating procedures and never cut corners
- Meet all regulatory requirements concerning product safety and labeling
- Ensure that our suppliers meet our supplier requirements, and
- Raise concerns about quality and safety issues immediately

We also must be vigilant in addressing any problems with our products in the field. We may learn of quality or safety issues relating to our products in many different ways – through conversations with customers or suppliers, telephone calls, emails, blogs, chat rooms, social media platforms, letters, faxes or even in conversations with neighbors. No matter the source, we must report this information promptly.

If you receive information from any source that our products may not be functioning properly or that they may be unsafe, report that information within 24 hours to the appropriate technical support contact for your region or country. Technical support numbers are located on the Hill-Rom website.

Rose is preparing a shipment of stretchers for delivery when she notices that several side rails are not latching correctly. The latch mechanism seems to be made out of a different material than what she’s seen before. She knows that patient safety is a big concern, but she is also aware that this order is late, and the customer is unhappy that it has not yet been delivered.

How should Rose proceed?

A. Rose should send the shipment as soon as possible. Missing deadlines is never acceptable. Besides, keeping the customer happy, no matter what, is our biggest priority.

B. Rose should send the shipment and then call the manufacturing team to confirm whether the materials have changed.

C. Rose should stop what she’s doing and report the situation immediately to her manager, another member of management and/or the Quality Assurance and Regulatory Affairs Department.

D. Rose should stop what she is doing and investigate the issue on her own.

Answer: C. Meeting a delivery schedule is never an excuse for allowing a potentially malfunctioning product to be shipped to a customer. This could put patients at risk and damage the reputation of our company and our customers.

“EVEN INTERACTION... IS AN OPPORTUNITY TO DEMONSTRATE OUR COMMITMENT TO ENHANCING PATIENT AND CAREGIVER OUTCOMES.”

“WE MUST WORK TO BUILD AND MAINTAIN THE TRUST AND POSITIVE RELATIONSHIPS WE HAVE ESTABLISHED.”
Interactions with Health Care Providers

Every day, employees interact with Health Care Providers ("HCPs") in various settings for a variety of reasons. Our interactions with HCPs must meet the highest standards of integrity, and we must conduct our business activities and interactions in a compliant manner and avoid even the appearance of impropriety. Around the globe, Hill-Rom is committed to ensuring that our educational and promotional efforts benefit patients and that our programs and collaborations with HCPs – both individuals and entities – do not have, or appear to have, an improper influence on medical judgment, or on purchasing, leasing, recommending, using or prescribing Hill-Rom’s products. We demonstrate our commitment to our core value of integrity by complying with applicable laws, regulations, industry codes and professional requirements in the countries in which we operate. It is important to remember that many HCPs are considered government officials both inside and outside the U.S. due to the worldwide predominance of state-run healthcare systems and hospitals under government sponsorship. Therefore, many interactions with HCPs are also subject to laws and regulations that apply to interactions with government officials as well as to the internal rules of an HCP’s employer.

Hill-Rom has a zero tolerance policy toward kickbacks, bribery and corrupt conduct in any form. Improper incentives to influence the selection of our products. Improper incentives may include meals, entertainment, trips, gifts, free products or services, grants and scholarships. On occasion, we may provide approved sponsorship. Therefore, many interactions with HCPs are also subject to laws and regulations that apply to interactions with government officials.

Specific requirements and procedures for interacting with HCPs can be found in the following implementing guides:

- Interactions with U.S. Health Care Providers Guidebook ("U.S. IHCP Guidebook")

- Country/Regional Guidance on Interactions with Health Care Providers ("Country/Region IHCP Guide")

The IHCP Guides cover the following topics:

- Educational items and gifts
- Meals, travel and prohibition on entertainment
- Promotion, product support and Hill-Rom-sponsored education
- Fee-for-service and other arrangements with HCPs
- Funding support for sponsorship, medical education grants, research grants and charitable donations, and
- Clinical research, etc.

Quid Pro Quo Examples to Avoid

- Quid Pro Quo = (literally, “this for that” in Latin) Means to give something with the expectation that you will get something in return.

  - A salesperson submitted a form to sponsor a non-U.S. HCP’s travel and lodging to attend a medical conference, stating that the “business benefit” from the sponsorship was that, in return, the Company would receive a contract for the sale of a particular medical device.
  - A marketing manager hired a Nursing Director to participate in an advisory board meeting in return for a “favorable” recommendation to place a medical device on formulary.
  - A plant manager paid travel costs for the director of a public hospital to attend a single-day factory tour plus 2 days of personal travel in exchange for business.

The IHCP Guides provide guidance on key principles, requirements, processes and the ethically appropriate manner in which we should interact with HCPs. Adhering to these rules is vital to our stakeholders and our ultimate goal of enhancing outcomes for our patients and their caregivers. If a conflict arises between these policies and applicable local laws or industry codes, the more restrictive rule applies. If you have any questions about whether a particular activity or funding opportunity is appropriate or allowable, please contact your manager or the Global Compliance Office.

QUESTION & ANSWER

Justin, a member of the Hill-Rom Sales Team, has been managing a big hospital account for the past couple of years. The hospital has purchased many products from Hill-Rom and has proven to be a reliable customer. Lately, Justin is feeling under pressure to make another sale so he offers Bill, his contact at the hospital, box seat tickets to a local professional baseball game. Justin knows that Bill is a big baseball fan and thinks that this will be a great opportunity to remind Bill about Hill-Rom’s latest line of hospital beds and hopefully score another sale. Is Justin doing the right thing?

Answer: No. Justin is providing an expensive item with the intent to induce his customer to purchase hospital beds. Even though the hospital has purchased beds from Hill-Rom in the past, it is never acceptable to provide gifts or entertainment to a health care provider. Furthermore, we should avoid even the perception of attempting to influence an HCP’s purchasing decisions or clinical judgment, so Justin’s provision of the gifts and entertainment with the intent to make a sale make this activity especially problematic. If you have a question about the lawful and ethical ways to interact with health care providers, review the Global Policy on Interactions with Health Care Providers, IHCP Guides, and/or discuss your question with the Global Compliance Office.
Government Contracting and Tenders

When we respond to government tenders and contract directly with government agencies, we must comply with a complex set of rules and work closely with the Legal Department. The failure to follow these rules can result in loss of contracts, payment of fines and penalties, and even criminal liability.

At a minimum, we must ensure that:

• We present to the government only project proposals, bids and reports that are complete, accurate and forthright
• We submit claims for payment that reflect work accurately and do not overstate the amount to which Hill-Rom is entitled
• We cooperate in good faith with all government requests for audits and inspections, and
• We immediately report to the Legal Department any suspected violations of laws or regulations, company policies or our contractual obligations

We follow all laws, including all Anti-Kickback laws and the False Claims Act in both letter and spirit. U.S.-based employees needing additional guidance should consult the Fraud, Waste, and Abuse Policy, the Global Policy on Interactions with Health Care Providers, and the Selling to the U.S. Government Policy. For employees located outside of the U.S., please consult the Legal Department for additional information on government contracting.

Data Privacy

We have an obligation to protect the privacy of all personal information concerning patients, customers, suppliers, contractors, vendors and others that we receive in the course of our work. We uphold our privacy policies when personal information is collected, stored, processed, transmitted and shared. Not only does our vigilance ensure we stay compliant with global data protection and privacy laws, it enables us to continue delivering quality results around the world.

Patient Information

We must adequately safeguard the privacy of medical records and other patient information that we receive or access while performing our jobs. As a medical device and technology company, we are subject to many health information privacy laws, and we must understand and fully comply with them.

What Is Patient Information?

Patient information is any information about health status, the delivery of health care or the payment for health care that can be linked to a specific individual. It includes any information related to a patient’s health condition, services received, invoices, medical charts and insurance coverage information.

Customer and Supplier Information

We must also protect confidential information belonging to our customers, suppliers, contractors and vendors. Confidential information may include business records or data, personal and financial information, personal identification numbers, bank records, trade secrets and proprietary information. If you have access to or otherwise come into contact with this type of information, you must ensure that it is handled according to our Confidential Information and Non-Disclosure Agreement Policy as well as to any confidentiality obligations we have in agreements with third parties. For more information, please refer to the Information Security Policy or contact the Privacy Officer or the Legal Department.

If you need further information about health information privacy laws, refer to the Health Information Privacy and Security Policy and the U.S. Health Information Breach Investigation Policy and Procedure, or contact the Hill-Rom Privacy Officer or the Legal Department.

You can reach the Privacy Officer via email at Hill-RomPrivacyOfficer@hill-rom.com.
Health Care Laws and Regulations

While conducting our business, we adhere to all global health care laws and regulations as well as Hill-Rom’s health care policies and procedures. We also must report any suspected violations of any applicable U.S. federal and global health care program requirements, as well as other violations of Hill-Rom’s policies and procedures, to the Global Compliance Office immediately.

Medical Device Laws

We follow all applicable laws, regulations and company requirements in the design, testing, production, promotion, registration, approval and distribution of our products. These laws vary from country to country, and we must be sure that we understand and follow the laws in the countries where we do business. In addition, our communications with government agencies that regulate medical devices – like the U.S. Food and Drug Administration and similar regulatory authorities in other countries – must be complete and accurate.

Promotion and Sales

We will sell our products based on their effectiveness, quality, safety and price, not on the basis of gifts or inappropriate financial relationships, meals or entertainment with customers, health care providers or patients. In addition, we must promote and market our products for authorized uses only, using only those sales materials that have been approved in accordance with company policy. For more information, please refer to the sections on Accurate and Truthful Information and Interactions with Health Care Providers in this Global Code.

Reimbursement and Billing

We must ensure that reimbursement activity with public and private payers is always legitimate and allowed by applicable rules governing the relationship. We must also ensure that any claims we prepare and submit to public or private payers are accurate and consistent. If you are involved in the billing and collection function, then you are expected to understand and comply with all billing policies and procedures as well as applicable requirements of third-party payers. Hill-Rom only bills for goods or services that are properly ordered and delivered or performed.

Disclosure of Status As Ineligible Person

Our company does not hire or work with individuals who have committed fraud or other unlawful actions against U.S. federal health care programs. Individuals who have engaged in such activities will have been notified that their names appear on one of the exclusion lists maintained by the U.S. government. If you or someone you work with is on one of these exclusion lists, you must immediately notify the Global Compliance Office.

Promotion and Sales

We will sell our products based on their effectiveness, quality, safety and price, not on the basis of gifts or inappropriate financial relationships, meals or entertainment with customers, health care providers or patients. In addition, we must promote and market our products for authorized uses only, using only those sales materials that have been approved in accordance with company policy. For more information, please refer to the sections on Accurate and Truthful Information and Interactions with Health Care Providers in this Global Code.

Resources

For further information on our company’s policies for complying with medical device laws, sales and promotion practices, and reimbursement and billing, please refer to:
- The Quality Manual
- Global Policy on Interactions with Health Care Providers
- Third Party Payer Compliance and Integrity Program Policy Manual
- Fraud, Waste, and Abuse Policy

We should also consult Quality Assurance and Regulatory Affairs, the Legal Department, the Global Compliance Office or other subject matter experts when we have questions about whether our conduct is legal and within policy. If you believe that a health care law or regulation has been violated, please discuss your concern with the Global Compliance Office immediately.
Anti-Harassment

Hill-Rom must be a safe and inspiring environment that allows each of us to work free from harassment. Harassment is behavior that creates an offensive, intimidating, humiliating or hostile work environment that unreasonably interferes with another person’s work. Colleagues, managers, suppliers, contractors, clients, customers or vendors may not engage in harassment that violates our policy.

Keep in mind that harassment may be physical, verbal, written, electronic or visual. Harassment can also be sexual or non-sexual in nature.

Sexual harassment may include:
• Unwanted advances
• Inappropriate sexual jokes
• Sexually suggestive comments or touching, and
• Inappropriate comments about another’s appearance

Non-sexual harassment may include:
• Offensive comments, and
• Jokes or pictures related to race, religion, ethnicity, gender, age or any other legally protected factors

In order to keep harassment out of our workplace, we must be sure that our comments and actions are appropriate and respectful. If you feel that you have experienced or observed any discriminatory or harassing behavior, you are encouraged to disclose the situation to your supervisor, or to Human Resources. If you do not feel comfortable disclosing to your supervisor or to Human Resources, you may also contact the Compliance Helpline by phone or email.

Recently, Edward’s manager, Jim, has been talking to him a lot about a colleague, Marissa. Jim has been making comments to Edward about Marissa’s physical appearance, and Edward has noticed Jim “stopping by” Marissa’s desk more frequently. Then, yesterday, Edward heard Jim make a comment to Marissa about “looking good” in her outfit. Edward is uncomfortable with the situation and concerned that his manager is violating the Global Code. Edward is also hesitant to ask Jim to stop what he is doing for fear of retaliation. However, because Edward is not the recipient of Jim’s advances, he is confused on what he could do to fix the situation. What should Edward do?

Answer: Edward should talk to someone about his concerns. As Hill-Rom employees, we are expected to ensure that all of us are treated with dignity and respect. We are also expected to protect our Company from legal and reputational damage. It is understandable that Edward would not want to raise this issue directly with his manager. However, he should report his concerns — namely, that he is uncomfortable with both Jim’s comments and actions — to any resource listed in the Global Code as soon as possible in order to prevent the situation from escalating. Edward will never face retaliation for making a report in good faith.

FELLOW EMPLOYEES

We live and work in many different countries, and no matter where we do business, we work together to develop and deliver superior products to customers and patients. We strive to have fun at work but never at the expense of exhibiting the utmost respect for each other. And while we come from a wide range of cultures and different perspectives, our diversity is a fundamental strength.
Workplace Safety and Health
We are committed to providing a safe and healthy working environment. We each have a responsibility to understand and follow all company safety and security policies and procedures as well as applicable laws and regulations. Nothing justifies working around or ignoring any safety rule – whether the rule is a company policy, a regulation or a law. If you become aware of or suspect that there are any safety issues or unsafe working conditions, you should immediately report the situation to your manager, your site Environmental, Health and Safety leader or the Legal Department.

For more information, refer to the Health & Safety Policy.

Violence and Weapons in the Workplace
Physical intimidation, threats of violence and abuse have no place at Hill-Rom. Weapons of any sort are never allowed inside company buildings. If you know of or suspect incidents or threats of workplace violence, report your concerns immediately to Human Resources or to your site safety leader. If there is an immediate danger or threat of violence, you should contact local law enforcement authorities.

Substance Abuse
We may not be on company property or in company vehicles, nor may we perform company work if we are impaired by drugs or alcohol. On rare occasions, we may be permitted to consume alcohol at designated work functions. These include holiday parties or office-wide celebrations. Moderation should be exercised during all such events. You should consult with your human resources representative to learn more about the drug and alcohol policies applicable to your location.

Employee Privacy
Hill-Rom is committed to protecting sensitive personal information, whether it is in paper or electronic form. “Personal information” is any information that can be used, alone or in combination with other information, to identify a specific individual. It includes a person’s name, address, email address, date of birth, driver’s license number, financial account numbers, Social Security number or other government identification number, and other identifiers. Personal information can also include medical information, benefits information, compensation or other employment information.

We must ensure that personal information about current, former or prospective employees is protected, and we must collect, use and share personal information only with those who have a legitimate need to use it and who will protect it in accordance with our policies. Where appropriate, we should provide notice to explain how Hill-Rom will use an employee’s personal information and respect individual choices regarding the collection, use and disclosure of personal information. We should retain or destroy personal information in accordance with company policy. If you believe personal information about Hill-Rom employees has been disclosed or used improperly, contact the Privacy Officer or the Legal Department immediately.

You can reach the Hill-Rom Privacy Officer via email at Hill-RomPrivacyOfficer@hill-rom.com.
Our continued success depends on maintaining financial performance and achieving the results we seek, though never at the expense of our integrity. We strive to provide honest, accurate and timely information to our shareholders about our performance and to make clear disclosures in all public reports and communications. We are responsible for protecting Hill-Rom’s resources, acting on our company’s behalf and working to create the greatest possible value for our company. When our company succeeds, we all win.
Avoiding Conflicts of Interest

We never allow personal or family interests to influence our professional judgment or impact the best interests of Hill-Rom. We must identify potential conflicts of interest and work with management to resolve them.

What Is a Conflict of Interest?

A conflict of interest arises when our personal relationships, activities, associations or financial interests interfere or even appear to interfere with our independent judgment or obligation to act in the best interest of our company.

While there are many situations that may create a potential conflict of interest, the most common types of conflicts that we may face include:

- Having a substantial financial or professional interest in a supplier, vendor, customer, competitor, distributor or other company with which we seek to do business
- Turning Hill-Rom's business opportunities into our own, such as through side businesses
- Operating or working with a business that competes with or contracts with Hill-Rom
- Making personnel decisions regarding family members, friends or those with whom we have romantic relationships
- Engaging our company in a business relationship with a family member or a business in which a family member holds a significant financial interest, and
- Participating in outside business activities that compete with our company or that affect our ability to devote appropriate time and attention to our assigned job responsibilities

A conflict of interest is not necessarily unethical, nor does it always constitute a violation of the Global Code. Each of us must identify potential conflicts or the appearance of conflicts when they arise and bring them to the attention of our manager to ensure a fair and prompt resolution. If you are a manager and need additional guidance on handling a potential conflict of interest, please contact your human resources representative or the Global Compliance Office.

Keep in mind, however, that disclosure alone is not enough – we are expected to do the right thing and act with transparency and integrity until the situation is appropriately documented and resolved. If you are a manager and need additional guidance on handling a potential conflict of interest, please contact your human resources representative or the Global Compliance Office.

Exchanging Business Courtesies

While fun is an essential value for our business, we must always ensure that gifts and entertainment are appropriate and that we think carefully about how we provide or accept them. We must make objective business decisions based on merit and not because of gifts or entertainment that were provided by third parties.

Gifts

We must not offer or provide gifts, regardless of value, to any supplier, distributor, consultant or vendor with whom we do business or seek to do business without the express approval of the Global Compliance Office. As a common business courtesy, we may accept occasional gifts, such as a coffee mug, as long as such gifts are nominal in value, could not be perceived to be lavish and are not intended to improperly influence our business decisions.

Meals and Other Hospitality

We may accept from or provide occasional meals or hospitality to a customer, supplier, distributor, vendor or other person with whom we do business, as long as such meal or other hospitality:

- Is modest in value and not lavish
- Occurs in a business-appropriate venue
- Is provided in the course of a business relationship
- Cannot be perceived as an attempt to improperly influence a business decision
- Relates to a legitimate business purpose, and
- Would not embarrass Hill-Rom if publicly disclosed

For additional details on the exchange of gifts, meals and other business courtesies with suppliers, consultants, distributors or vendors, please refer to our Policy on Exchanging Business Courtesies. For additional details on such exchanges with health care providers please refer to our Global Policy on Interactions with Health Care Providers. If you have any concerns about a specific business courtesy, please ask your manager or the Global Compliance Office.

Martin, an employee of Hill-Rom, has worked with one of Hill-Rom’s vendors over the past several years. To thank Martin for his help with a recent contract, the vendor invited Martin to be their guest at a charity dinner. The vendor has a table reserved for corporate guests. Martin would be part of the group at the vendor’s table. Martin thinks this is a great way to maintain the relationship with the vendor. Is this situation acceptable?

Answer: Yes. Martin will be attending the charity dinner along with other corporate guests, so the invitation would not be viewed as an attempt to influence Martin’s behavior toward the vendor or unfairly retain the vendor’s business. Since representatives of the vendor will be present at the dinner and it is not lavish in nature, Martin would have the opportunity to strengthen his relationship with the vendor. However, Martin should disclose his attendance at this event to his manager or the Global Compliance Office.

“OUR SUCCESS DEPENDS ON ACHIEVING THE RESULTS WE SEEK, THOUGH NEVER AT THE EXPENSE OF OUR INTEGRITY.”
Maintaining Accurate Books and Records

We must record and report information so that it reflects an accurate and complete picture of our business transactions. We must never knowingly create or participate in creating incomplete or misleading information nor inaccurately record the timing of any event or transaction. We are all responsible for the accuracy of the records we create and maintain and for following all record retention policies.

Manufacturing

We must keep our manufacturing and quality inspection records accurately and completely to facilitate inspection, audit review and regulatory reporting.

Sales and Distribution

We must keep accurate written records of our product sales and distribution so that we can generate accurate financial reports and projections.

Financial Information

It is critical that we prepare and maintain accurate financial records.

We must make full, fair, accurate, timely and understandable disclosure in reports that our company files with our financial regulators and in other public communications made by our company. We must do this in accordance with the Generally Accepted Accounting Principles and the regulations of the Securities and Exchange Commission as well as under other applicable auditing and regulatory guidance.

Should you learn that any company books and records are inaccurate or misleading, you must immediately raise the issue with your manager, the finance representative for your team or to the Global Compliance Office.

Suppliers

We select our suppliers based on price, quality, delivery, service, diversity, reputation and business practices. It is critical that our suppliers share our commitment to conducting business with integrity, follow the standards set forth in the Hill-Rom Global Third Party Code of Conduct, and act in strict compliance with all applicable laws and regulations.

When selecting or dealing with a supplier or potential supplier, we must:

• Engage in fair and open competition
• Ensure suppliers are reputable and qualified
• Ensure that the hiring of a supplier does not create an actual or apparent conflict of interest, and
• Evaluate and approve suppliers before any materials, components, products or services are purchased from them in accordance with company policy

Insider Trading

We may never buy or sell Hill-Rom securities (like stock, options and bonds), or the securities of other companies, on the basis of “material non-public information” (also known as “inside information”) that we learn of, including as a result of our work with Hill-Rom. We may never share this information with others outside our company so that they can buy or sell Hill-Rom or other securities with the benefit of material inside information.

What Is “Material Non-Public Information”?

In general, this is information that has not been made public and that a reasonable investor would find important when deciding whether to buy, sell or hold a corporation’s securities. Information is considered public only if it has been made generally available to investors, such as in our company’s filings with the U.S. Securities and Exchange Commission or in a press release, and if investors have been allowed a reasonable period to react to the information (normally within two trading days).

Some examples of material inside information include:

• Non-public financial results, such as monthly or quarterly revenue, net income or earnings per share
• Mergers, acquisitions and other important business developments
• Important regulatory or litigation developments, and
• The development or release of significant new products or recall of existing products

The violation of insider trading laws is a serious crime and can result in significant civil and criminal penalties. We must follow our Insider Trading Policy and consult with the Legal Department to resolve any questions we may have before we trade in Hill-Rom securities.
Business Intelligence

We respect the confidential and proprietary information of our competitors and customers. Therefore, we may use only lawful and ethical methods to gather information about our competitors and customers. We may collect business intelligence from public sources, such as company websites, published articles, advertisements, public presentations and customers who are under no confidentiality obligation. We also must communicate to our agents, consultants or other business partners who gather information on our behalf that they must observe guidelines similar to Hill-Rom’s when acting on our behalf.

We must NOT:
- Seek to obtain sensitive information directly from any competitor
- Lie or make misrepresentations when gathering information, nor use covert means of gathering information, or
- Recruit employees with the intent to obtain any confidential information

Upon inadvertent receipt of confidential information about a competitor or customer, immediately call the Legal Department without passing it to others so that the appropriate action may be taken.

Protecting Intellectual Property and Confidential Information

We must not disclose our company’s intellectual property or confidential business information with any persons inside or outside the company unless they have a legitimate business need to know it and management has granted prior authorization. Each of us is responsible for knowing what constitutes confidential information and following all policies to protect it.

What Is Intellectual Property?
Patents, trade secrets, trademarks, copyrights, design rights, trade dress, logos, know-how, photos and videos, individuals’ names and likenesses, and other intangible industrial or commercial property.

What Is Confidential Business Information?
Company information that is not public, including new product designs or development plans, financial data and projections, business development plans, strategic plans, customer lists, sales and marketing data, pricing, customer and supplier contracts, and access passwords.

We must ensure that our conversations are not overheard, that sensitive documents are secure and that our mobile devices, such as computers and phones, are not lost or left unattended. Our obligation to maintain the confidentiality of our company’s intellectual property and confidential business information continues even after we leave employment at Hill-Rom.

For more guidance on our obligations regarding Hill-Rom’s intellectual property and confidential business information, please consult the Intellectual Property Policy, the Confidential Information and Non-Disclosure Agreement Policy or the Legal Department.

Physical Property

We must take care to prevent the theft, destruction or misuse of Hill-Rom’s physical property, including company funds, equipment, communications systems and facilities. With the exception of the incidental personal use of communication systems, we must use company property for business purposes only and never for our own personal gain or that of another person. Notify your manager and the IT Service Desk immediately if you believe that company equipment or property has been lost, damaged or stolen.
Information Security

Electronic Usage

When drafting any electronic message, we understand that the internet is a public place and, once transmitted, messages and their intent can be easily altered, distorted and forwarded without our knowledge or permission. Our communications must reflect our Hill-Rom values, including respecting each other and our diverse perspectives. To do this, we follow these principles in all communications with our stakeholders:

Follow the Headline Rule
Would you be comfortable if this communication appeared on the front page of the newspaper? If not, don’t write it. Also remember: written communications should generally exclude sarcasm, venting or inappropriate speculation.

Consider the Best Mode of Communication
Which tool best suits your message? Depending on their complexity, urgency and sensitivity, each matter may require a different mode of communication, such as a telephone call, a meeting, an email or an instant message.

Verify Your Audience
Review email addresses carefully and be mindful of using the “Reply All” feature in email. Keep internal messages within Hill-Rom.

Respect Privacy and Confidentiality
Except as required for your job, only disclose private or confidential information to those individuals who are authorized to know the information.

At no time may we use the Internet or our email for unauthorized, illegal or unethical purposes, to harass or demean an individual or group, or to download sexually suggestive or explicit material. By communicating responsibly, you help protect Hill-Rom’s reputation and your reputation as well.

Software on your computer and other electronic devices is company property and must be used according to licensing agreements. Company information should not be transferred from your computer onto unapproved portable media devices. All portable media devices that store company information must follow the appropriate encryption and password protection requirements established by the IT Department. Contact the IT Department if you have questions regarding the appropriate use of portable media devices.

Communications with Investors, Press and Interest Groups

As a company, we must speak with one voice to investors, analysts, the press and public interest groups, and in accordance with all applicable laws and company policy. We must not communicate on behalf of Hill-Rom unless we are authorized to do so under our Public Disclosure Policy.

Requests for Information
If you receive a request for information about Hill-Rom, please keep in mind the following simple rules:

- All requests from the media and public interest groups or for public endorsements or statements of support by the company should be referred to the Corporate Communications Department, and
- All investor or analyst requests should be referred to the VP of Investor Relations.

Initiating Communications
We are prohibited from initiating communications on behalf of Hill-Rom with the press, investors or public interest groups unless we are authorized to do so under our Public Disclosure Policy.
OUR GLOBAL COMMUNITIES

At Hill-Rom, we understand that the vitality of the communities where we do business impacts the long-term health of our business. Therefore, we are committed to participating actively in our communities. We demonstrate responsiveness to the evolving international landscape by respecting the checks and balances that are put into place to protect our global marketplace. We strive to improve the global communities where we conduct business, not only through the high quality products and services we provide, but also through the contributions we make. In every location where we conduct business, we will support our communities, protect our environment and conduct political activity responsibly.

Common sense and good judgment should be our guide when drafting any electronic message and using social media, both in its current forms and in whatever shape these media take in the future. If you believe you have witnessed the inappropriate use of Hill-Rom technologies or electronic communications on social media, notify your manager and the Legal Department immediately.

For additional information, see the Social Media Policy. If you have questions about a post you are planning to make, please contact Corporate Communications.
Community Involvement
Our mission carries a commitment to the communities where we work and live. Acknowledging social responsibility through active citizenship and thoughtful giving is part of our unwavering commitment to our communities.

As part of our commitment to making the world a better place, we uphold the global laws that impact our global business environment. Doing so not only ensures that we stay on the right side of the law but also demonstrates our integrity.

Bribery and Corruption Laws
Throughout the world, we conduct our business in compliance with the letter and spirit of applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the Organisation for Economic Co-operation and Development ("OECD") Anti-Bribery Convention, the UK Bribery Act and other applicable local laws. Hill-Rom employees and agents, distributors and any other third-party representatives are expected to conduct their business activities in a compliant and ethical manner and avoid even the appearance of impropriety.

Hill-Rom has a zero tolerance policy toward bribery and corrupt conduct in any form. Improper inducements involving government officials, health care professionals (both individuals and entities) and others in the marketplace, such as government and private customers, competitors and suppliers, are strictly prohibited.

Keep in mind that in our business, we often interact with government officials because employees of government ministries, customs officials, government consultants and all HCPs who work for a government-owned or government-run hospital or other public institution can be considered government officials. Accordingly, the prohibition against bribery applies with special force to our interactions with government officials and HCPs.

Even if refusing to participate in a corrupt activity results in the loss of business, we always must remember that it is against the law and against our policy to directly or indirectly offer, promise, pay or give anything of value to any person or organization with the intent to influence the recipient to provide an improper advantage to our company.

Red Flags
It is important to watch out for red flags when working with Third Party Representatives. A "red flag" is a sign that there is a problem that should be dealt with to resolve any issues that may indicate the potential for corruption. Some red flags to watch for include:

- A request that a commission be paid in cash, in another name or to an address in another country
- Unexplained large expenses on a travel and entertainment expense report
- An agent demanding a higher-than-normal commission for a transaction
- A company that is a shell company or has an unusual corporate structure, and
- Anything that just doesn’t feel right!

If you come across a red flag in any of your business dealings that involve a current or proposed Third Party Representative, you must promptly contact the Hill-Rom Global Compliance Office at globalComplianceOffice@hill-rom.com.
World Trade Controls and Boycotts

We must follow the rules that govern the export of our products and technology from one country to another and the rules that govern with whom we can do business. In general, when we ship or transfer our products and technology from one country to another, or enter into business relationships with other entities, those of us responsible for international operations must work closely with the Legal Department to understand and apply our policies and procedures regarding trade controls. There are three general types of trade issues that arise: sanctions, export controls and boycotts.

Sanctions

The United States and other countries impose partial and total restrictions on trade with particular nations, entities and individuals unless companies acquire certain licenses. We must ensure that Hill-Rom does not ship products or technology to, or do business with, such countries, entities and persons without obtaining the proper licenses.

Export Controls

The U.S. and other countries restrict the export of particular technology and information if we do not have the appropriate license, regardless of the destination. When we export products and technology from one country to another, we must ensure that we do not need a license or that we have the proper licenses.

Money Laundering and Anti-Terrorist Financing

Hill-Rom is committed to assisting in the fight against money laundering and terrorist financing. These activities are illegal worldwide, and this is an issue that our company takes extremely seriously.

“Money laundering” is the process by which criminal funds are moved through the financial system in order to hide all traces of their criminal origin. “Terrorist financing” refers to the destination and use of funds that may come from legitimate or criminal sources.

We must exercise vigilance when dealing with unusual or suspicious transactions. Alert your manager to any situation that seems inappropriate or suspicious. If you have questions or concerns, contact the Legal Department.

Kyle is traveling to meet with a potential customer in Germany. Part of the purpose of his trip is to present the design for a new medical device on which Hill-Rom is planning to begin production. Kyle is bringing his laptop, which contains the product design, as well as a variety of sales and marketing brochures. What does Kyle need to know about export law?

A. Any technology Kyle has with him when he travels internationally may be considered an export.
B. Export controls apply to most products, software and technology as well as samples, laptops, schematics and product manuals and should be considered each time Kyle travels.
C. Hill-Rom policy requires that company property and technologies remain in Kyle's sole control and possession for the duration of the trip.
D. All required licenses must be obtained.
E. Questions about hand-carried items should be directed to the Legal Department.
F. All of the above.

Answer: F. Kyle needs to know all of the above items regarding export law.
Complying with Worldwide Competition Laws
We achieve results based on the quality of our products and our employees, never through unfair business practices. We must adhere to all competition laws (sometimes referred to as “antitrust” laws) that apply to our work. These laws may vary from market to market, but their goal is the same. They are designed to preserve free and open competition and promote a competitive marketplace.

Failure to comply with these laws can have serious and far-reaching consequences for our company and the individuals involved.

Sharing Information
We must not share commercial or market information with our competitors concerning pricing, conditions and terms of sale, costs, markets or customers.

Collusion with Competitors
We must not discuss or agree with competitors to set prices, allocate markets or tenders, discriminate against customers or suppliers, nor coordinate activity in any other way.

Restricting Customers and Suppliers
We must consult with and obtain approval from the Legal Department when we are considering entering into an agreement with a customer that would prohibit a customer from purchasing products from our competitors. Similarly, we also must consult with and obtain approval from the Legal Department when we are considering entering into an agreement with a supplier that could place restrictions on supplying one of our competitors.

For additional guidance, please refer to our Antitrust Policy. Should any competitor, customer or supplier attempt to discuss any issues that raise antitrust concerns with you, please contact the Legal Department immediately.

Rules for Dealing with Competitors
Always:

- Refuse to take part in discussions or arrangements that may be seen as anti-competitive.
- Communicate any actual or potential anti-competitive discussions you have witnessed or taken part in to the Legal Department or the Global Compliance Office, and
- Seek advice from the Legal Department if you come across confidential or proprietary information about Hill-Rom’s competitors.

Never:

- Share confidential information with competitors – including bids, proposals or strategies.
- Discuss pricing, whether formally or informally, with competitors, or
- Agree, either formally or informally, to allocate markets or territories.

Protecting the Environment
At Hill-Rom, we strive to meet or exceed all applicable environmental laws, regulations and permit conditions. We also use environmentally sound manufacturing practices to ensure protection of the surrounding environment. Environmental regulations may include rules governing the use and control of regulated materials that may reach the environment as a part of wastewater, air emissions, solid waste, hazardous waste or uncontained spills. Even non-regulated materials must be managed in a responsible and sustainable manner. Many of these materials can have adverse environmental impacts if mishandled through use, transportation, storage or disposal.

We are expected to understand and adhere to environmental, health and safety regulations in our daily activities. If your job involves contact with any regulated materials or requires you to make decisions about how any materials are used, stored, transported or disposed, you need to understand how they should be legally, responsibly and safely handled.

Please refer to our Environmental Policy or our Health & Safety Policy for further guidance. If you have additional questions, please contact the Director of Environmental, Health and Safety or the Legal Department.

Political Activities and Contributions
When appropriate and legal, our company may make political contributions and may choose to engage in political discussions about issues that affect our business.

In the United States, we may not engage in political activities and discussions on behalf of Hill-Rom unless such activities are authorized by the V.P. of Government Affairs. We may make contributions to governmental elections only where such contributions are lawful and in accordance with our Policy on Political Contributions.

Internationally, we will not pay any funds or furnish any facilities or services to any political party, nor to any candidate for or incumbent of any public office, nor to any initiative or referendum campaign without prior approval from the Global Compliance Office.

Our company recognizes and encourages our individual rights to participate in the communities where we live and work. However, we may only participate in political activities on our own time and at our own expense. We may never use or even appear to use Hill-Rom’s name, time, funds, facilities, assets or other resources, directly or indirectly, for political purposes or contributions without express written approval from the V.P. of Government Affairs in the United States or the approval of the Global Compliance Office for activities abroad.

Political Action Committee
Our company has organized the Hill-Rom Holdings, Inc. Political Action Committee (HRPAC). This committee solicits voluntary contributions from company employees to support candidates for U.S. federal government as permitted by law. For additional information regarding the HRPAC, please contact the V.P. of Government Affairs.
Disclosure of Waivers

Any waiver of any provision of the Global Code must be approved in advance by the Hill-Rom Board of Directors or an appropriate committee of the Board of Directors. Any waiver of the Global Code approved by the Board of Directors for an executive officer or director must be promptly disclosed to shareholders.

"OUR COMPANY’S CONTINUED GROWTH AND ABILITY TO MEET OUR COMMITMENT TO PATIENTS ARE DEPENDENT UPON THE INTEGRITY OF OUR PEOPLE."