



Code of Business Conduct

Global Ethics and Compliance Policy

STERIS requires employees to be lawful and ethically responsible in all business practices. STERIS expects all employees to learn and comply with all Company Policies, applicable laws, and the principles outlined in this Code of Business Conduct.

Fundamental Ethical Values

Certain values are fundamental to our business activities:

- **Integrity** – We embrace truthfulness and trust. We say what we mean and deliver what and when we promise.
- **Mutual respect** – We value and respect our Customers, suppliers, fellow employees and communities.
- **Responsibility** – We strive for excellence in everything we do. We adhere to established legal and ethical standards. We are responsible for our actions.
- **Corporate Citizenship** – We operate our businesses in a manner that respects and obeys all applicable laws.

The STERIS Workplace

An environment that supports honesty, integrity, respect, trust, diversity, and responsibility allows us to achieve performance excellence in our workplace.

The Company is committed to an environment free from unlawful harassment and discrimination. STERIS employees are expected to conduct themselves in a manner appropriate for the work environment and that is consistent with our values. All employees are expected to perform their responsibilities and conduct themselves and interact with others in a professional manner.

Health, Safety and the Environment

STERIS is committed to conducting operations in compliance with all applicable laws protecting human health and the environment.

Employees are required to comply with all applicable environmental laws, health and safety laws, and Company policies. Environmental and health and safety laws are complex, subject to frequent changes, and vary from country to country. Employees should seek the advice of designated Environmental Compliance and Health and Safety Department employees, or the STERIS Legal Department about the application of these laws.

Third Party Relationships

STERIS requires ethical relationships with Customers, suppliers, regulatory agencies, and others with whom we deal. Employees with the designated responsibility must comply with all applicable product regulatory approvals, good manufacturing practice requirements, design controls, labeling and advertising controls, and other applicable product regulations and controls of the Company or governmental agencies.

Relationships with third parties, as well as all business decisions, must be based on what is required by law and in the best interests of STERIS, and must not be motivated or influenced by personal considerations.

Employees should discuss, with their supervisor or the STERIS Legal Department, any activity that might create a conflict of interest. Examples of potential conflicts include:

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

Inquiries from third parties such as the media or the financial community must be forwarded to the appropriate Communications, Finance, Investor Relations, or Legal Department representative for appropriate handling.

STERIS employees have access to private, confidential, or proprietary information owned by and/or about the Company. Confidential information is information that is not generally known or readily available to others. This information includes technical know-how and data, trade secrets, business plans, marketing and sales programs, and sales figures, as well as information relating to mergers and acquisitions, stock splits, divestitures, licensing activities, and changes in senior management. Confidential information also includes personal information about STERIS employees, such as salaries, benefits, and information contained in personnel files. Such confidential information must not be disclosed to third parties without appropriate approvals.

With the rise of social media and communications tools, the way in which STERIS employees can communicate internally and externally continues to evolve. These emerging media tools include: video, blogs, wikis, podcasts, virtual worlds, and social networking. Employees must understand that the same policies and requirements about communicating STERIS information 'offline', also apply in the 'online' world, especially with respect to the disclosure of proprietary information, the use of STERIS intellectual property, and professionalism.

Political Activity / Dealing with the Government

Most political contributions to candidates by corporations are prohibited in the United States and many other countries. Employees may make political contributions on a personal or individual basis and may also participate in the STERIS PAC on a voluntary basis. Employees may not, however, commit Company resources to political campaigns without STERIS Legal Department and CEO approval.

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

The recruitment and employment of former or current government employees is subject to special rules and possible restrictions. These rules may also apply to family members of the government employee. Contact the STERIS Legal Department concerning potential hires of government employees.

Competition Law and Trade Practices

STERIS employees must engage ONLY in lawful and ethical competitive practices. The laws governing commercial competitive practices are very complex. Generally, competitors may not agree or have an arrangement:

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

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

The United States and other countries regulate international trade of certain commodities, technologies, and services through import and export restrictions, trade embargoes, and economic sanctions. Imports or exports may be subject to laws and regulations that require prior approval, licensing, or reporting requirements. If in doubt about these laws, contact the STERIS Legal Department.

Employees of STERIS and its affiliates (even those residing outside of the United States) must comply with the United States Foreign Corrupt Practices Act (FCPA) and similar international laws. In general, these laws make it unlawful to bribe, or offer to bribe, any foreign government official to influence or keep business. Employees may not make payments to agents or any other representative of STERIS if the employee has reason to believe that these payments may result in bribes to foreign officials. Not all payments to government officials are illegal, but FCPA rules are complex. Contact the STERIS Legal Department if you have questions concerning the application of these laws.

Information and Records

Accuracy and reliability in the preparation of all financial documents, government filings, and other business records is required by law and STERIS Company Policy. All Company accounting records, as well as reports produced from these records, must be kept and presented in accordance with the laws of each applicable jurisdiction, and must accurately and fairly reflect the Company's assets, liabilities, revenues and expenses. All transactions shall be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period. Compliance with Generally Accepted Accounting Principles and the Company's system of internal accounting controls is required at all times.

Financial and other information that the Company considers private or proprietary must be kept confidential. Such information may relate to new plans, products or processes; mergers, acquisitions or divestments of businesses; sales; profitability; negotiations related to significant contracts; significant litigation; or other material information. Because this information is a valuable Company asset, it may not be:

- Disclosed to third parties without appropriate authorization,
- Used for personal gain, or
- Acted upon in violation of the STERIS Stock Trading Policy.

STERIS Resources

STERIS entrusts employees with numerous Company assets, including the information that resides on Company computer systems and networks. Every employee has a responsibility to obtain and use Company and customer assets appropriately and in accordance with Company Policy. Employees are responsible for the proper use of e-mail, internet access, computer programs and related copyright licenses, and other Company assets including Company-licensed products and services utilized in the performance of their job.

STERIS employees recognize that STERIS resources (e.g., 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. Employees and others have no right to privacy, subject to applicable laws, for any information, personal or otherwise, on any Company communication system or other Company property.

Code and Policy Violations

A failure by any employee to comply with laws or regulations governing the Company's business, this Code or any other Company Policy or requirement, may result in disciplinary action, termination, and if warranted, legal proceedings. Nothing in this Code or other Company Policies constitutes a contract of employment with any individual or assurance of any duration of employment.

Questions about Compliance and Reporting Violations

If you have any questions or concerns about compliance with the subjects described in this Code, or are unsure of “the right thing” to do, talk with:

- Your Supervisor,
- Your location or Corporate Human Resources,
- Internal Audit Department,
- The STERIS Legal Department (especially when dealing with any law or regulation), or
- The STERIS Integrity Helpline (Phone numbers and access codes are located on page 7)
- The STERIS Integrity Weblines. (Weblines address is located on page 7)

The STERIS Integrity Helpline and Weblines do not replace traditional communication channels already in place. However, if you have an issue regarding an ethics or compliance related matter, or you have observed something that may be a violation of the Company’s Policies, and you feel you cannot communicate effectively using existing internal Company channels, call the STERIS Integrity Helpline or report online through the STERIS Integrity Weblines. Reports on the STERIS Integrity Helpline and Weblines may be made anonymously and without reprisals for matters reported in good faith.

Conclusion

This Code is only a summary of the Company’s expectations for ethical and appropriate business conduct. The Company has detailed policies which support this summary. In the event of any questions, concerns or needs for clarification about appropriate employee behavior, STERIS management is willing and able to provide guidance and counsel.

Integrity Helpline Reporting

To report unethical or compliance related issues over the phone, please use the STERIS Integrity Helpline by dialing the following phone numbers and access codes for the country in which you are located:

Country	Access Code	Phone Number
United States		855-326-9721
Canada		855-326-9721
Brazil	0-800-888-8288 (Mobile)	855-607-8702
	0-800-890-0288 (Landlines)	
China	108-710 (North)	855-607-8702
	108-10 (South)	
Finland	0-800-11-0015	855-607-8702
France	0-800-99-0011 (France Telecom)	855-607-8702
	0-805-701-288 (Telecom Development)	
Italy	800-172-444	855-607-8702
	001-800-462-4240	
Mexico	001-800-288-2872	855-607-8702
	001-800-112-2020	
Spain	900-99-0011	855-607-8702
United Kingdom	0-800-89-0011 (British Telecom)	855-607-8702
United Kingdom	0-500-89-0011 (C&W)	

International Dialing Instructions

The Network uses the AT&T Direct system and dialing is a two stage process. Employees should dial the country access code and then a United States toll free format number. The access code allows the caller entry into the AT&T system. After dialing the access code, the caller will be connected to a live operator, receive a voiceless tone, or hear a pre-recorded announcement with directions. The operator or recording will instruct the caller to enter the toll-free number. If the caller hears the voiceless tone (bong), the toll-free number should be dialed at the end of the tone. Upon dialing the toll free number, the caller will be connected to a line in the United States and hear an announcement in their native language. This announcement will indicate to the caller that they are connected to The Network. The employee will be then be placed upon a brief hold until an interpreter is online. Once the interpreter is on the line, the employee should proceed with the call.

Integrity Weblne Reporting

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

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

STERIS MISSION, VISION, AND VALUES

MISSION:

AT STERIS, WE HELP OUR CUSTOMERS CREATE A HEALTHIER AND SAFER WORLD by providing innovative healthcare and life science product and service solutions around the globe.

VISION:

Inspired by our Customers' efforts to create a healthier and safer world, and guided by our legacy of leadership and innovation, we strive to be a Great Company. To STERIS, this means we will make a difference by providing world-class product and service solutions for our Customers, safe and rewarding work for our People, and superior returns for our Shareholders.

VALUES:

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 product and service solutions 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 performance daily. We provide innovative product and service solutions to our Customers.

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 solutions.

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 and our people. We are trustworthy and honest, and carry out our work in a professional, ethical, and legal manner. We challenge actions inconsistent with our values.

This Code of Business Conduct is not a contract and may be changed at any time by the Company without notice.