

# DO THE RIGHT THING

## SUNRISE MEDICAL'S BUSINESS CODE OF CONDUCT





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# LETTER FROM PRESIDENT & CEO



**DEAR SUNRISE MEDICAL ASSOCIATE,**

Sunrise Medical is committed to conducting our business in compliance with all applicable laws and in alignment with the highest ethical standards.

For us, acting according to the applicable laws needs to be a given for all companies. What differentiates companies from each other are the ethical standards they set out for themselves and, even more so, how these standards are being incorporated, understood, and accepted by their personnel on a day-by-day basis.

Sustaining our reputation and continually striving to earn trust are not only the right things to do; they are essential to our company's success.

It is Management's responsibility to ensure that all of our principles and ethical standards are well known throughout the organization and that all of our colleagues are well prepared to meet the challenges of our ever-changing business environment.

Management takes this responsibility seriously. One building block in that respect is our Business Code of Conduct "Do The Right Thing."

It has been created to serve as a roadmap, guiding us along the path to choosing the most ethical way to govern our business. It incorporates our mission and guiding fundamental principles and highlights the types of ethical and legal issues that may confront us in our marketplace.

Do The Right Thing means very little without the personal commitment of each of us. Our expectation to all Associates is to join us in Sunrise Medical's commitment to Do The Right Thing! If you are a new Associate, we expect you to familiarize yourself with the principles outlined here. If you are a long-time Associate, we expect that you will revisit this guide from time to time. As a Sunrise Medical Associate, we expect you to seek guidance when situations or questions arise regarding these guidelines.

You have our commitment that the leadership of Sunrise Medical will act according to the highest level of integrity in all our business practices. We will also support each of you in adhering to this same standard, not only because it is good business, but also because it is the right thing to do.

Thank you for your help and support.

Sincerely,

Thomas Babacan  
President & CEO

# OUR BASIC PRINCIPLES

Our Mission Statement:

## IMPROVING PEOPLE'S LIVES

As we conduct business at Sunrise Medical within a framework of internal policies, professional standards, laws, and regulations, we also acknowledge that these do not govern all types of behavior we encounter in our daily business dealings. As a result, we also have a Business Code of Conduct for all Sunrise Medical Associates (all Sunrise Medical employees, contractors, officers, and directors) called Do The Right Thing.

This Code is based upon our company mission statement and values and has been created to serve as a roadmap we can all follow to strengthen the company's ethical climate and to provide basic guidelines for situations when we are not always sure how to act. By plotting a path along the Sunrise Medical values, Do The Right Thing takes our business to the highest level by putting our values into action in support of fair, correct, and accurate business processes.

The Principles supporting the Sunrise Medical business foundation are based upon:

## OUR MISSION OUR VALUES

Each of us at Sunrise Medical has an obligation to know and understand not only the guidelines contained herein, but also the values on which they are based. As individuals, we are encouraged to raise any issues and concerns we feel are appropriate. If we discover a violation of the Business Code of Conduct, we are responsible for reporting the problem immediately without fear of reprisal.

The Business Code of Conduct, however, does not have answers for every situation or "grey area" dilemma we may confront. When faced with a values dilemma not covered by the Code, ask for help. Your manager or supervisor can assist you with the decision process. Your Human Resources Department can also be contacted, or you can contact the Sunrise Medical Whistleblowing Service (see page 19).



Sunrise Medical is a world leader in the development, design, manufacture and distribution of innovative, high-quality manual wheelchairs, power wheelchairs, motorized scooters, standard and customized seating and positioning systems, and daily living aids.



# OUR VALUES

Our five values are Customer Focus, Excellence, Innovation, Commitment, and Teamwork, all of which are incorporated into everything we do.

These values underpin our commitment to being a socially responsible company where we strive to respect our customers, our business partners, our Associates, our communities, and the environment within which we operate, ensuring the highest ethical standards are adhered to.

## CUSTOMER FOCUS

Our customers come first! We expect to not only meet, but to exceed the expectations of both internal and external customers, through relationships based on trust. We maintain that trust with prompt and professional communication.

## EXCELLENCE

Our goal is to "Improve People's Lives!" We're committed to performing extraordinary efforts every day in what we do, both as individuals and as a company. That commitment extends to the highest level of quality.

## INNOVATION

Strive to continually improve! Sunrise Medical and its Associates continually redefine our business and are proactive in providing innovative, reliable and quality products, processes, and solutions. We encourage our Associates to be open to, and promote, new ideas that can improve our business and the lives of our customers.

## COMMITMENT

We expect our Associates to take responsibility and ownership. Demonstrate determination and initiative and provide added value to Sunrise Medical. Get involved and do your best!

## TEAMWORK

The principles of teamwork, sharing, and fostering information are crucial to achieving our business objectives. A positive and proactive team spirit leads to improved results. To our internal team, we offer support, guidance, motivation, and constructive feedback when and where needed to the highest level of quality.

## MUTUAL RESPECT

Sunrise Medical is committed to protecting and enhancing Associate safety and treating individuals respectfully. We base employment decisions on business reasons such as qualifications, experience, performance, and achievements, while complying with local and national employment laws and practices. We value diversity and inclusion and seek to provide a working environment free from intimidation, discrimination, and harassment.

We expect all Sunrise personnel to treat others the way they would like to be treated (i.e., with respect) and avoid using any abusive, derogatory or offensive language. Abusive or harassing conduct is unacceptable in any form. As a Sunrise Medical Associate, you are encouraged to speak out when someone's conduct makes you or others feel uncomfortable. Harassment may include derogatory remarks, epithets, offensive jokes, offensive actions, or the display or circulation of offensive printed, visual or electronic material.

Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, or other physical, verbal, or visual conduct based on sex constitutes harassment and is completely unacceptable.

We provide equal opportunity in recruiting, hiring, developing, promoting and compensating without regard to age, color, disability, gender, gender identity, national origin, race, religion, sexual orientation, veteran status, political affiliation, or any other basis that is protected under applicable law.

Managers bear additional responsibility to help contribute to a positive, motivating workplace where open communication is the norm. Anyone who feels uncomfortable about expressing concerns to Management about workplace issues without fear of criticism, punishment, or retribution should contact Human Resources or contact the Sunrise Medical Whistleblowing Service.



## OUR COMMITMENT TO QUALITY

The foundation of the success of Sunrise Medical is in its employees and their commitment to quality and improving people's lives. It is the policy of the Company to provide customers with the product and services they require, which at all times comply with the design parameters that meet and, whenever possible, exceed customers' expectations.

It is believed that successful achievement of this policy depends upon the following:

- Commitment from everyone, at all levels, to excellence in the way the job is done
- Willingness to accept and adopt the approved methods of working
- Support for the disciplines of systems and procedures, which contribute to policy
- Establish and regularly review quality objectives
- Recognition that continuous improvement in the quality of product and service provided is the only way of ensuring future success
- Adherence to the principles and practices embodied in this policy is the responsibility of every employee.

Sunrise Medical is committed to comply with regulatory requirements, maintain the effectiveness of the quality management system, and to reduce our negative impact on the environment.

## RESPECTING HUMAN RIGHTS

Sunrise Medical fully supports the aims of the Modern Slavery Act 2015 and is committed to operating free from slavery and human trafficking. We have a zero tolerance approach to slavery and human trafficking in any form, in any part of our business or supply chain.



# OUR WORKPLACE RESPONSIBILITIES

## HEALTH & SAFETY

Sunrise Medical is committed to providing a clean, healthy, and safe place to work through local health and safety programs designed to prevent work related injuries and illnesses, as well as comply with environmental, health and safety regulations. All Sunrise Medical facilities are committed to be in compliance with applicable environmental, health and safety regulations for the country in which they are located and all applicable national or international product requirements, such as those specified by the EU, UK and Swiss Medical Device Regulations, the Federal Food and Drug Administration (FDA) in the United States, Health Canada in Canada, the Therapeutic Goods Administration (TGA) in Australia, and numerous other global regulations and standards.

Preventive actions are key to providing a healthy and safe place to work. It is important that Associates follow all safety regulations applicable for their particular work area such as the use of Personal Protective Equipment (PPE) where required, as well as all safety regulations for their location. It is important that Associates immediately report any unsafe or high-risk situation or potential incidents to their supervisor or the health and safety representative for their location.

In order to maintain our safety, each of us has an obligation to report to work free from the influence of any substance that could impair our work safety and efficiency. In addition, threats, acts of violence or intimidation, and possession or sale of firearms, other weapons or drugs on (or through) Sunrise Medical property are prohibited. For more detailed information, including specific policies related to firearms in the United States, please consult local policies.



## PROTECT THE ENVIRONMENT

Sunrise Medical is committed to protecting the environment and complying with all applicable environmental laws. We have a Global Environmental Initiative focused on environmental responsibility and promoting green thinking throughout the Sunrise Medical global organization and our supply base. By minimizing the environmental impact of our operations, and by operating our business in ways that will foster a sustainable use of natural resources, we will continue to protect the environment.

Sunrise Medical facilities participate with local initiatives, including recycling and energy conservation, to protect the environment. As Associates, we need to support this commitment by complying with our environmental policies and programs. Be sure to notify your supervisor or the Chief Compliance Officer immediately if hazardous materials are not handled or disposed of properly.

## OBSERVING LAWS & REGULATIONS

As a worldwide manufacturer of medical devices, we are required to comply with all applicable laws and regulations regardless of location. We abide by these laws and cooperate with governmental agencies concerning our operation.



If contacted by a governmental agency, you should consult with the appropriate business units, Compliance Officer, and/or Site Directors to seek instructions before responding, submitting to an interview, or allowing government officials access to company facilities or documentation. Notification should also be made to the appropriate Sunrise Medical Senior Leadership Team members when applicable. Perceived pressures from supervisors or demands due to business conditions are not an excuse for violating the law or this Business Code of Conduct. If you become aware of the violation of any law, rule, or regulation by Sunrise Medical, whether by its officers, employees, contractors, directors, or any third party doing business on behalf of Sunrise Medical, it is your responsibility to promptly report the matter to your supervisor or your local Sunrise Medical Human Resources Department, or to contact the Sunrise Medical Whistleblowing Service (see page 19). While it is Sunrise Medical's desire to address matters internally, nothing in this Business Code of Conduct should discourage you from reporting any illegal activity to the appropriate regulatory authority.

### **PROTECT CONFIDENTIAL INFORMATION**

While you are an Associate at Sunrise Medical, you may have access to a variety of confidential and proprietary information about our company and business partners.

This may include:

- Confidential data about individuals (Sunrise Medical Associates, customer or supplier representatives, and end users). Types of data that need to be protected include medical records, Associate salary data, home addresses and telephone numbers, and government identification numbers such as social security numbers or national insurance numbers. Sunrise Medical strives to be in compliance with all applicable data privacy laws throughout the world that govern the protection and use of personal data.

- Confidential and proprietary Sunrise Medical business information, such as, but not limited to, financial data, business plans and budgets, customer lists and customer pricing, inventions, pending public announcements, trade secrets, know how, marketing and sales programs, research and development information, and customer and supplier information.

- Confidential business partner (customers, suppliers, etc.) information such as business processes, organizational information, and financial data.

No proprietary or confidential information is to be disclosed to non-Sunrise Medical Associates unless such disclosure has been authorized by appropriate personnel (or management). Disclosure of this information within Sunrise Medical should be on a business, need-to-know basis. It is important to remember that the obligation to protect confidential and proprietary information remains in effect even after you leave Sunrise Medical. Likewise, we require that new Associates honor any confidentiality obligations with previous employers. Managers may not pressure Associates to violate their confidentiality obligations. Any offer of information that may constitute a competitor's trade secrets should be refused unless acceptance is authorized by Executive Management.

In order to restrict unauthorized access, be sure to safeguard confidential or proprietary information whether in hard copy or electronic format.

## ELECTRONIC COMMUNICATIONS

Properly using and safeguarding electronic communications poses a unique and complex challenge. Our Communications Systems policies and practices provide detailed information that you are responsible for reviewing and following. The basic rules include:

- Conduct all communication activities consistent with the Sunrise Medical Business Code of Conduct and local policies.
- Never disclose or transmit confidential or proprietary information without proper authorization and security measures.
- Maintain password confidentiality, and never share your passwords with individuals other than authorized Information Technology Associates or your department manager when required to do so for valid business purposes.
- Do not use Sunrise Medical communications services and equipment for unethical, inappropriate, or abusive purposes including but not limited to:
  - Conducting illegal activities;
  - Creating, transmitting, storing, or viewing offensive, harassing, demeaning, insulting, defaming, intimidating, or pornographic material, including profanity and jokes.
  - Engaging in activities or soliciting for personal gain or profit or on behalf of another organization; and
  - Using Sunrise Medical equipment for personal use, including participation in on-line chat forums and non-business public groups.
- Never attempt to access the files of another Associate without proper approval from a supervisor and Human Resources.
- Do not duplicate or download any software or materials that are copyrighted, patented, trademarked, or otherwise identified as proprietary intellectual property without appropriate licenses and written permission from the Information Technology department.
- Never interfere with the normal operation of any Sunrise Medical computer system or internet gateway.

The use of social media presents certain risks and carries with it certain responsibilities. In general, Sunrise Medical views blogging, personal websites, and social networking sites positively and respects the right of Associates to use them as a medium of self-expression. Limited and occasional use of Sunrise Medical systems to engage in these types of activities is acceptable, provided that it is done in a professional, responsible manner and does not interfere with your regular work duties. Please keep in mind, though, that if you engage in these types of activities on Sunrise Medical systems, it is also subject to monitoring. More information on blogging and social media use can be found in Sunrise Medical's Information Communication Policy, but here are some general guidelines to follow:

- Do not use a Sunrise Medical email address to register on social networks, blogs, or other online tools for personal use.
- Be honest, accurate, and respectful and post only appropriate content.
- Do not make medically prescriptive recommendations.
- Do not represent yourself as a spokesperson for Sunrise Medical, unless you are expressly authorized to do so.
- Do not speak to the media on behalf of Sunrise Medical without prior authorization from the Marketing department.
- Remember that all guidelines and requirements found in this document and all other Sunrise Medical policies and procedures apply to your online activities.

## PROTECTING COMPANY ASSETS

Sunrise Medical facilities, equipment, and product reputation have been established through hard work and commitment by Sunrise Medical and our fellow Associates. We share an obligation to protect our assets as if they were our own. Company property including furnishings, equipment and supplies, as well as intangible or intellectual property, such as patents and trademarks, electronic data and customer and supplier lists, should be used only for authorized business-related purposes. Any acquisition or disposal of property must be pre-authorized using the company's approval authority guidelines and disposal policies. You may also contact your supervisor for more information. As Associates, we also share an obligation to prevent access to company property, including computers and cell phones, electronic documents, and information systems from unauthorized persons. Laptop computers remain company property, exclusively to perform your job, and must be returned when you leave Sunrise Medical. Likewise, no company property should be removed from the facility without specific approval of a supervisor or department manager, with the exception of paperwork and/or portable office equipment necessary to perform your job which must be returned upon completion. Any work developed by Associates or contractors within the scope of their employment with Sunrise Medical belongs to Sunrise Medical.

## ACCURACY OF COMPANY RECORDS

Accurate books and records are critical to our business in order to meet our financial, business, and legal obligations and to make responsible decisions. All of our business communications must be truthful, clear, and compliant with all accounting and legal standards, corporate policies and practices, and other regulations and controls.

Accurate and complete records must be kept for all business activities such as, but not limited to, financial statements and analyses, product test documents, product complaints, injury reports, research reports, service records, legal contracts, expense reports, time cards, personnel files, and status reports.

Sunrise Medical is an international company, and financial records must be consistently prepared in accordance with international and local accounting principles and regulations as required or necessary for business purposes. Further, all product record and injury and complaint reports must be complete and accurate.

The responsibility for ensuring accurate product and accounting records resides not only with regulatory, quality, finance, and audit personnel but with all Associates. If you become aware of any falsification, inaccuracy, or omission regarding Sunrise Medical records, bring the situation to the attention of the appropriate person at Sunrise Medical or contact the Sunrise Medical Whistleblowing Service. All reported instances will be thoroughly investigated. In addition, no Associate may mislead, influence, coerce, or manipulate any independent auditor who is performing an audit of our financial, quality, or regulatory records or any other type of audit.

The effectiveness of our record keeping systems depends on the accuracy of each individual's input and proper maintenance and protection of our records. Therefore, financial, operations, test, and other data need to be maintained in accordance with the company's policies and procedures. Under no circumstances should documents requested by government agencies be destroyed, altered, or falsified, or any effort made to impede, obstruct, or influence an investigation; to do so is a violation of law.

## CONFLICTS OF INTEREST

As Associates of Sunrise Medical, we all have the responsibility to preserve and enhance the company's integrity by ensuring our business decisions are based solely on what is best for the company. A "conflict of interest" can occur when an individual's personal interest is or could be adverse to – or appears to be adverse to – the interests of Sunrise Medical. Conflicts of interest also can arise when individuals, or their family members, receive improper personal benefits as a result of their positions with Sunrise Medical. "Immediate family" includes a person's spouse or partner, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone who shares such person's home.

As Sunrise Medical Associates, we should avoid any relationship, attempt to influence, or other activity, such as outside employment or consulting, which might impair, or appear to impair, our ability to make objective and fair decisions when performing our jobs. Your actual or potential conflict of interest situations must be reported to Management for guidance on how best to avoid potential conflicts. If you note potential conflict of interest situations involving others, discuss the situation with your local Human Resources Representative or contact the Sunrise Medical Whistleblowing Service (see page 19).



## GIFTS AND ENTERTAINMENT

It is sometimes customary for persons conducting business with one another to provide or accept gifts, meals, or similar business courtesies. Business courtesies may be a tangible or intangible benefit. With respect to gifts, all gifts given or received by a Sunrise Medical Associate must be legal, reasonable, and approved by Management. It is generally permissible to accept items of a nominal value (i.e., not greater than €50 Euros), but Associates may not accept anything of higher value which might make it appear that their judgment has been compromised. Unsolicited gifts of greater than nominal value should be either returned or given to your supervisor (or Human Resources) to return or otherwise handle in an appropriate manner. Gifts of cash should always be refused.

Gifts, gratuities, or offers of entertainment of any kind made to government or political officers are not permissible. For further details, please consult the sections of this booklet on Government Contracts and International Business.

The exchange of social amenities (i.e. business lunches, dinners, or entertainment) between Sunrise Medical Associates and third parties is acceptable when reasonably related to a clear business purpose within the bounds of good taste, within a normal business relationship, and when government contracts or offices are not involved. However, any entertainment, favor, or gift that is repetitive and/or carries a perception of influence for the giver or the recipient is inappropriate. This restriction also applies to immediate family members.

Payments to induce customers to purchase products or refer patients are strictly prohibited. Such inducements may violate fraud and abuse regulations. These types of violations jeopardize government contracts and can carry serious legal penalties, both for the company and the individual.



## **POLITICAL CONTRIBUTIONS**

Although we do not discourage Sunrise Medical Associates from engaging in political activities on their own time and at their own expense, no Associate will be compensated or reimbursed by the company for any personal political activity or contribution. For any materials related to political correspondence, you should not use company letterhead, your company email account, or your job title since this might imply a corporate endorsement of your activities or of a particular political candidate. Any personal political contribution or activity must not indicate that it is endorsed or supported by Sunrise Medical.

## **INSIDE INFORMATION & INSIDE TRADING**

Inside information is generally defined as material information that has not been publicly disclosed and which may have an impact on the value of company securities. Such information may include non-public financial information, product development information, acquisition information, information about government investigations, or information about changes in key personnel. Any Associate who has obtained inside information relating to publicly-held companies (including clients, vendors, and competitors) is prohibited from trading securities of such companies while an Associate of Sunrise Medical. These rules apply to all Associates, regardless of where they are located. Violation of these rules may expose both the company and the individual to criminal and civil sanctions.





# OUR RESPONSIBILITIES TO OUR CUSTOMERS AND BUSINESS PARTNERS

## REPRESENTATION OF OUR PRODUCTS

To uphold the high standards and integrity of Sunrise Medical in the marketplace, our products and services are marketed and sold fairly based on their quality, capabilities, price, service level, and other legitimate attributes. All forms of advertisements will be authentic, and no product will be promoted for a use other than its specifications. These same principles must be adhered to when responding to inquiries from customers, fellow Associates, the media, and regulatory or government agencies.

## PRODUCT SAFETY & STANDARDS

Sunrise Medical is dedicated to providing high quality products to fully satisfy the needs of our customers. Since our products are used in situations where failure or error could have serious consequences, it is imperative that we comply with all applicable standards such as the EU, UK and Swiss Medical Device Regulations, Federal Food and Drug Administration (FDA) in the United States, Health Canada in Canada, Therapeutic Goods Administration (TGA) in Australia, and numerous other global regulations and standards.

We work to understand our customers and their requirements. We base our decisions and actions regarding product quality on facts and information. If a quality problem or related customer complaint comes to your attention, you are responsible for reporting it to the Sunrise Medical customer service team or escalating it to the appropriate level of authority in a timely fashion, so that complaint can be entered using Sunrise Medical complaint handling procedures. When reporting, be sure to report just the facts (but all of the facts) and avoid editorializing and drawing conclusions. Established quality systems must be followed and documentation must be accurately, completely, and timely recorded. To protect the safety of our customers and the users of our products, we ensure that all products meet or exceed all safety standards

outlined within our Quality Management System. Our products are extensively tested before being released for production and only products that meet our safety requirements are released for distribution. Each product is labeled with appropriate warnings. These warnings and our product manuals are meant to alert the customer of the risks and limitations of our product.

## PURCHASING PRACTICES

Suppliers win Sunrise Medical business based on objective business reasons, such as quality, service, cost, performance, and the maintenance of adequate supply. All purchasing decisions must be made in compliance with Sunrise Medical's Global Purchasing Procedures. Sunrise Medical purchasing departments maintain an open door and open mind to new vendors/suppliers who may offer an improved product, better service, or more desirable price.

## FAIR COMPETITION

You may at times encounter competitors during industry events. Please take special precautions during conversation to avoid discussion of pricing, terms, or other proprietary information. If conversation turns to such matters, you should refuse to discuss this information. Likewise, if a competitor divulges trade secrets or confidential information regarding their company or another business, you should terminate the conversation and inform your supervisor. Refer to Confidentiality Agreements signed at time of hire or promotion for further information on fair competition.

# OUR COMMITMENT TO BUSINESS INTEGRITY

## GOVERNMENT CONTRACTS

Our commitment to integrity is constant, whether dealing with government or commercial customers. However, as suppliers to government agencies worldwide, we must abide by special requirements not usually found in the private business sector that have been established to protect the public interest.

These requirements span many areas of business conduct, including, but not limited to, protection of proprietary information, refraining from the offer and acceptance of business courtesies/gratuities, and hiring former government personnel. Government contracts often require the contractor to certify that it has complied with various contract requirements, such as certifying that certain pricing data is accurate, that our products conform to certain specifications, or that Sunrise Medical complies with equal employment opportunity laws. Do not deviate from a government's public procurement or tender process, even in the event a government official indicates that such a deviation is acceptable or condoned.

All Associates dealing with government contracts must keep themselves informed of changes and seek help whenever there is any doubt regarding appropriate behavior. It is the responsibility of these Associates to make sure that the company meets the terms and specifications of all government contracts. Failure to do so can carry serious legal penalties, both for the company and for the individual.

## INTERNATIONAL BUSINESS

Since we operate in many different countries around the world, a different dimension of complexity exists for Sunrise Medical business endeavors. In addition to operating legally within other countries, we need to be culturally sensitive and abide by the national and local laws of the countries where we operate. This includes, but is not limited to, immigration, customs, tax or exchange control laws, or regulations. The adherence to these laws is a strict requirement for all Sunrise Medical Associates while conducting company affairs.

## IMPORT-EXPORT CONTROL LAWS AND TRADE SANCTIONS

Compliance with import and export control laws, trade regulations, and trade sanctions is the explicit policy of Sunrise Medical and the responsibility of all Associates. Import and export controls can restrict the countries, persons, and entities with which we can trade. They may also require that validated licenses be obtained from applicable government agencies before making or receiving certain shipments. Import and export controls apply to Sunrise Medical's worldwide physical, verbal, and electronic materials. Each import and exporting division must have internal controls to assure full compliance with applicable import and export control laws and regulations.

Trade sanctions, including financial sanctions, are complex. If you have questions about any transaction with what may be a sanctioned country, entity, or person, contact the Chief Compliance Officer.



## BOYCOTTS

Under anti-boycott laws, Sunrise Medical may be prohibited from supporting a boycott imposed by one country upon another country. Prohibited conduct may include: agreements to discriminate, refusals to do business with certain countries or companies blacklisted by other governments, and the implementation of letters of credit that require boycott-related acts. These laws may also require that requests for information supportive of a boycott be reported to the government in a country where Sunrise Medical operates. Any request that Sunrise Medical participate in a boycott, or any request about Sunrise Medical's position on a boycott, should be immediately directed to Executive Management.

## ANTI-TRUST LAWS

Sunrise Medical strives to comply fully with all anti-trust laws. The underlying principle behind these laws is clear: a person who purchases goods in the marketplace should be able to select from a variety of products at competitive prices unrestricted by artificial restraints such as price fixing, illegal monopolies and cartels, and boycotts. Anti-trust law violations can have extremely serious consequences, including criminal prosecution, for both the company and any Associate personally involved in the violation. Unfortunately, the anti-trust laws are complex and vary internationally, so inadvertent violations can occur. As a general rule, you should avoid circumstances that may create the risk of illegality, and you should immediately leave any meeting site where competitors are discussing illegal acts such as coordinated bidding or sharing sensitive information such as pricing. Contact Executive Management whenever you are in doubt. You may also contact your local Human Resources Department or contact the Sunrise Medical Whistleblowing Service.

## ANTI-CORRUPTION ACTS / ANTI-BRIBERY ACTS

Sunrise Medical is committed to complying with all anti-corruption and anti-bribery laws. Examples include, but are not limited to, the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act 2010. These laws vary, but Sunrise Medical is committed to complying with all aspects of all relevant laws. This means that prohibited activities include, without limitation, giving or receiving bribes of any sort, whether to/from government officials or other third-parties. This includes bribes which may be given on our behalf by third parties. In particular, the bribery of foreign government officials, political party candidates or officials, or political parties is prohibited. Also prohibited are "facilitation payments," which are payments to induce officials to perform routine functions they are otherwise obligated to perform. If you are uncertain about any transaction that you believe may fall within the definitions of bribery, you must contact Executive Management and obtain approval before proceeding.

## ANTI-MONEY LAUNDERING / PREVENTING TERRORIST FINANCING

Sunrise Medical is committed to complying with applicable laws prohibiting money laundering, terrorism financing, or other criminal activity. If you become aware that a customer's funds were illegally derived or you become aware of any suspicious or inappropriate payment activity, which may include cash payments when checks are the norm, payments in a currency different than required in a contract, overpayments and requests for refunds, payments made from personal accounts instead of business accounts, and/or funds from financial institutions or third parties without a logical relationship to the customer or business partner, please contact the Finance Department, Chief Compliance Officer, or Sunrise Whistleblowing Service.

# SEEKING HELP AND SPEAKING UP

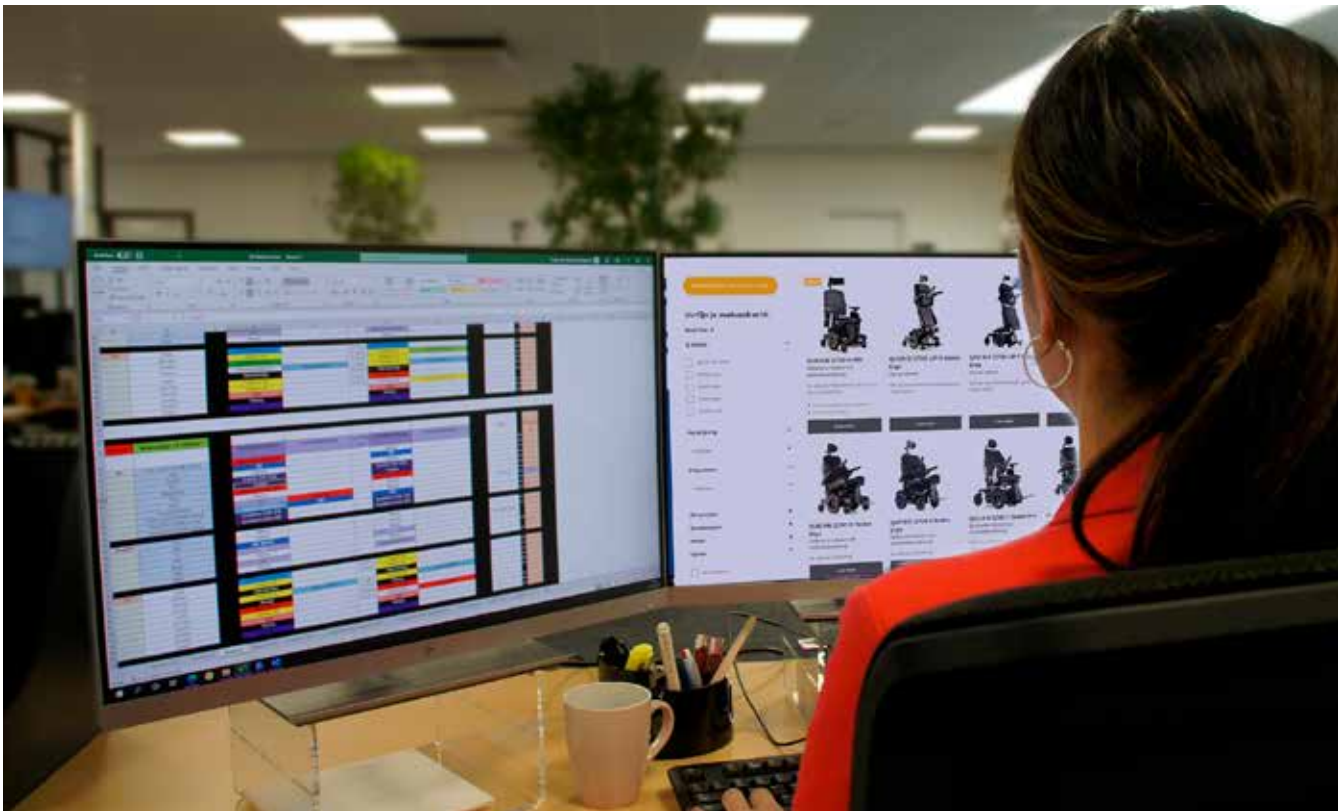
## SEEKING HELP & REPORTING VIOLATIONS

Sunrise Medical encourages Associates to handle violations of the Do The Right Thing program internally through all channels available. However, an external resource is also available if contacting internal resources would be uncomfortable. Internally, Associates may discuss an issue with their supervisor, another member of Management, the local Human Resources Department, or the Chief Compliance Officer.

Externally, Associates may contact the Sunrise Medical Whistleblowing Service and may choose to remain anonymous. However, some countries have laws that specify that certain types of incident reports cannot be made anonymously. When that is applicable, you will be asked to

identify yourself for legal compliance. Regardless of anonymity, all reports will be handled confidentially. Regardless of the reporting method, the question or report will be directed to the appropriate department for investigation, even when you choose to remain anonymous.

Anyone making a report will not be subject to retaliation or retribution for disclosing a situation he or she feels, in good faith, is in violation of our business conduct standards or the law.



## SUNRISE MEDICAL WHISTLEBLOWING SERVICE

The Sunrise Medical Whistleblowing Service is intended to assist you with business dilemmas. Sunrise Medical strives to conduct our business in a fair, honest, ethical, and lawful manner. We are all responsible to ensure that our Company's policies and ethical values are embedded in our decisions and behaviors.

To achieve this goal, as an organization we rely on your support and would like to emphasize your right and obligation to speak out clearly if you become aware of any unethical or illegal conduct. The same applies if you feel pressured to do something which is ethically questionable or wrong as expressed in this Code of Conduct or that would violate your rights.

We have a secure, third-party-operated whistleblowing service which provides Associates and external stakeholders with a means of seeking guidance or reporting suspicions of misconduct and any actions that are not in line with our ethics guidelines as expressed in this Code of Conduct.

This reporting channel can be used to report incidents of serious misconduct such as financial crime and accounting irregularities; the offering or acceptance of bribes; environmental risks or crimes; security vulnerabilities which constitute a risk for employees' or customers' health or safety; serious forms of harassment or discrimination; or other violations of the Company's Business Code of Conduct.

Although we encourage you to contact your supervisor, another manager, or the Human Resources function with your concerns, we also offer a channel for anonymous communication. This is provided by an external partner, WhistleB Whistleblowing Centre, to ensure your anonymity if you choose to remain anonymous.

The reporting channel administered by WhistleB can be accessed on any device, including smart phones, at the following web address: <https://report.whistleb.com/en/sunrisemedical>

Note that there are different languages available to guide you through the reporting process. All reports will be submitted promptly to our Compliance Committee for investigation and follow-up.

We allow no retaliation against a person that makes a report or sends a whistleblower message in good faith.

Confidential, professional counseling for personal issues is available at each business unit through applicable local programs. Contact your supervisor or the local Human Resources Department for information regarding available resources.

### RESOURCE CONTACT INFORMATION:

**Sunrise Medical Whistleblowing Service**  
<https://report.whistleb.com/en/sunrisemedical>

**Chief Compliance Officer Email Address:**  
[dotherightthing@sunmed.com](mailto:dotherightthing@sunmed.com)

**DO THE RIGHT THING**

SUNRISE MEDICAL'S  
BUSINESS CODE OF CONDUCT

2022

