



Passion for life

Getinge Ethics & Compliance Report

Content

INTRO

Vision	1
Business Ethics and Responsible Leadership	2

THE TEAM

Message from the EVP Legal, Compliance & Governance	4
Organization	5
Meet the E&C Team	6

BUSINESS CONTEXT

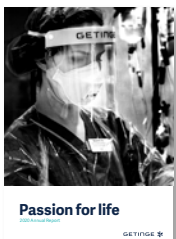
Global Trends	9
Lessons Learned in Brazil	10

THE FRAMEWORK

Our Code of Conduct	11
Our E&C Program	12
Creating a Speak Up Culture	14

FOCUS AREAS

Anti-Bribery Corruption	15
Antitrust	17
Business Partners	19
Data Privacy	21
Interaction with Health Care Professionals	24
Trade Compliance	26



For more information about our sustainability work, governance and GRI Index, see our Annual Report 2020 and our Sustainability Update 2020. For further information regarding Ethics & Compliance issues, please contact frida.berlin@getinge.com

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VISION

Becoming the World's most Trusted and Respected MedTech Company

Our vision is to become the world's most trusted and respected medtech company. This guides everything we do. Getinge provides products and solutions that help saving lives around the world. Our continued success in providing these life-saving products depends on each member of the staff upholding the highest

standards in everything we do. This comes with some heavy responsibility. Just as people trust doctors to do the right thing, our stakeholders trust us to do the right thing. This report aims for demonstrating how we build and maintain this trust.

Business Ethics and Responsible Leadership

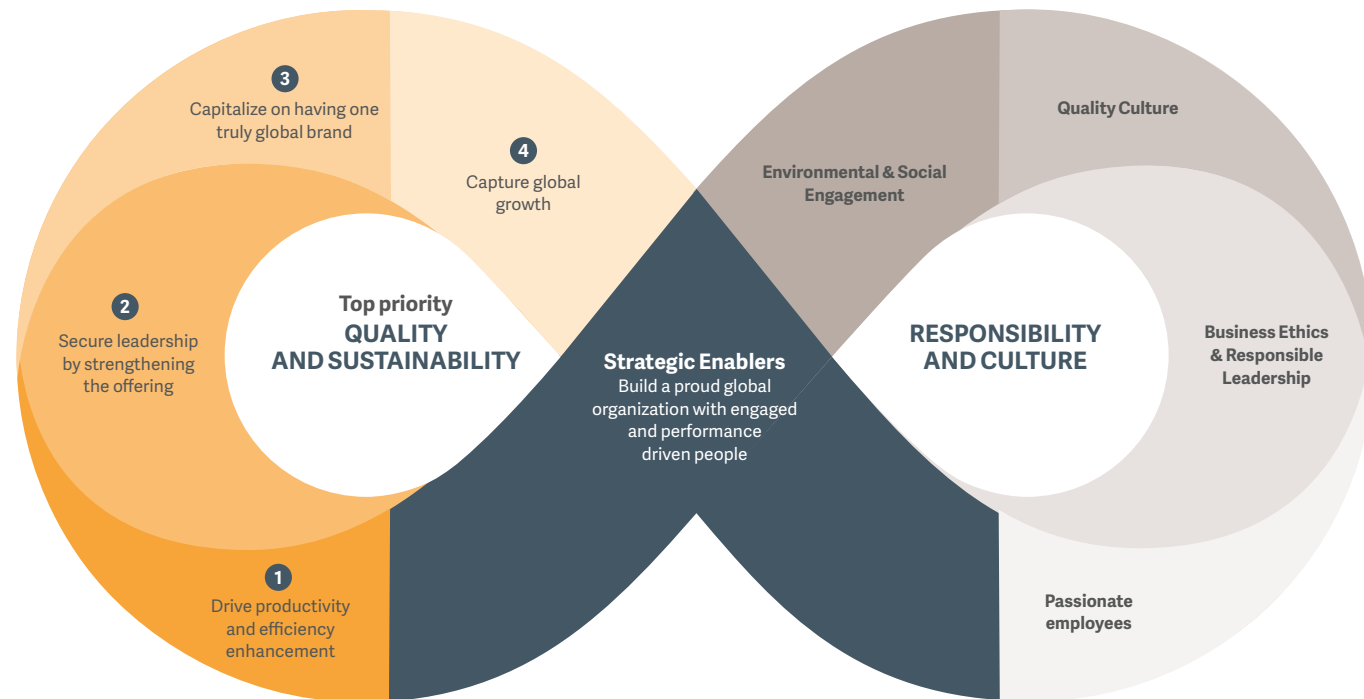
Getinge has long been dedicated to sustainability, and since 2017 sustainability, together with quality, is a top priority in the company's strategy. This means that ethics, quality and sustainability are integral parts of how the company acts as a business and how it treats its employees, customers and partners.

In 2020, Getinge raised its sustainability ambitions, which is described in the company's Sustainability Framework covering the focus areas of Quality Culture, Passionate Employees, Environmental & Social Engagement and Business Ethics & Responsible Leadership.

The Sustainability Framework provides the company with guidance on how to create long-term value, play a positive role in the society and continue to operate sustainably while delivering value to all of its stakeholders. Overall, Getinge's sustainability approach is focused on shaping the company's performance and positioning future matching requirements, including analyzing potential risks.

Getinge E&C work is centered around Business Ethics and Responsible Leadership, within the Sustainability Framework. The main purpose is to enable and inspire all employees to make the right decisions and to foster an open and transparent culture.

Business Ethics & Responsible Leadership
 At Getinge, responsible leadership means involving all employees to set the standard and acting as role models for ethical behavior and professional integrity. Activities in this area provide the conditions and requirements for Getinge's employees to ensure business is conducted in an ethical and responsible manner. Doing responsible business in all relations, in the company's own organization and in external contexts, is a key part of Getinge's strategy.



Focus Areas

In this report we will focus on describing our most material risks and focus areas in relation to Business Ethics and Responsible Leadership.

ANTI-BRIBERY CORRUPTION

page 15

As a global medical technology company we provide equipment and systems within health care and life sciences to public and private customers in 125 countries. We take part in public tenders and collaborate with business partners such as distributors and integrators. For us it is of utmost importance to manage the risk for bribery and corruption in all our business transactions.

ANTITRUST

page 17

Getinge operates in 125 countries, both through our own operations and through an extensive network of distributors. We have learned the hard way how important it is to secure fair competition and ensure that hospitals, and taxpayers do not suffer from unfair competition.

BUSINESS PARTNERS

page 19

Getinge has recently revised its Supplier Code of Conduct. The aim is to increase focus on responsible sourcing. The result is a new Business Partner Code of Conduct that has been extended to include all of Getinge's business partners and has a renewed focus on Human Rights. Getinge's purchasing function is responsible for implementing the new Code with support from the Ethics & Compliance team.

DATA PRIVACY

page 21

Maintaining customer trust in the security of and safety of its products is critical for Getinge. In addition, the importance of data privacy and the integrity of personal data is a constantly increasing. Meanwhile, the company needs to protect its most valuable assets against cyber threats. To secure data privacy and security we have formalised our related programs throughout the organization.

INTERACTION WITH HEALTH CARE PROFESSIONALS

page 24

Getinge interacts with hospitals and life science institutions all over the globe. The company has a great responsibility both in terms of patient safety, but also in terms of how public funds are spent in relation to its products and services. Securing integrity and transparency when interacting with health care professionals and health care organizations is a top priority.

TRADE COMPLIANCE

page 26

Our life saving products are sold globally and in some extent also to sanctioned countries. We do however never compromise with laws and regulations and have implemented processes to secure compliance and integrity when selling to high risk countries.

HUMAN RIGHTS

With a passion for life we take pride in securing the human rights of both internal employees as well as for individuals working for Getinge throughout our value and supply chain. Our work with Human Rights is described in the Business Partner section of this report. During 2021 we will continue to focus on designing a dedicated E&C program for Human Rights.

To Enable and Inspire

For us at Getinge, Ethics and Compliance is something that should characterize every aspect of how we do business, with all stakeholders and a longer time perspective in mind. We see Ethics and Compliance as responsible leadership and something that is relevant for all employees and in every business transaction and decision.



During the last few years, Getinge has invested heavily to ensure that we have the right resources and tools in place to support and inspire responsible leadership. The ultimate aim is to enable right decisions and navigate the complexities and ethical dilemmas that global business often entails. And to achieve this, we have put a great team in place to support our operations across the globe. Naturally, we also have the formal infrastructure in place, such as e-learning programs and policies. E-learning programs, however, will only make a difference if the information conveyed in the training actually means something for each and every one of us. In this report, we want to share how we aspire to integrate ethics and compliance in everything we do, how we work together with our leaders to ensure that the right considerations are made early on, that we have the transparent discussions and dare to speak-up when something is not right.

A recent Nordic survey (www.nordicbusinessethics.com) indicate that a majority of the employees working for Nordic companies who witness ethical misconduct, do not speak up. And with sales in 125 countries, we have to be mindful of cultural differences



I am proud of the work that we do and of each and every employee at Getinge who strives to make a difference.

and difficulties in terms of speaking up and raising concerns. We also want to be humble when we look back on our previous mistakes and ensure that we learn from these in order to build a stronger, more responsible and long-term sustainable company.

I am excited about this first Ethics and Compliance report, I am proud of the work that we do and of each and every employee at Getinge who strives to make a difference. Each decision is important and will take us one step closer towards becoming the most trusted and respected company in the MedTech industry.

Anna Romberg
Executive Vice President
Legal, Compliance & Governance

Our Governance Model for Ethics and Compliance

At Getinge the Ethics and Compliance (E&C) work is designed to ensure that it is a shared commitment across all levels in the organization.

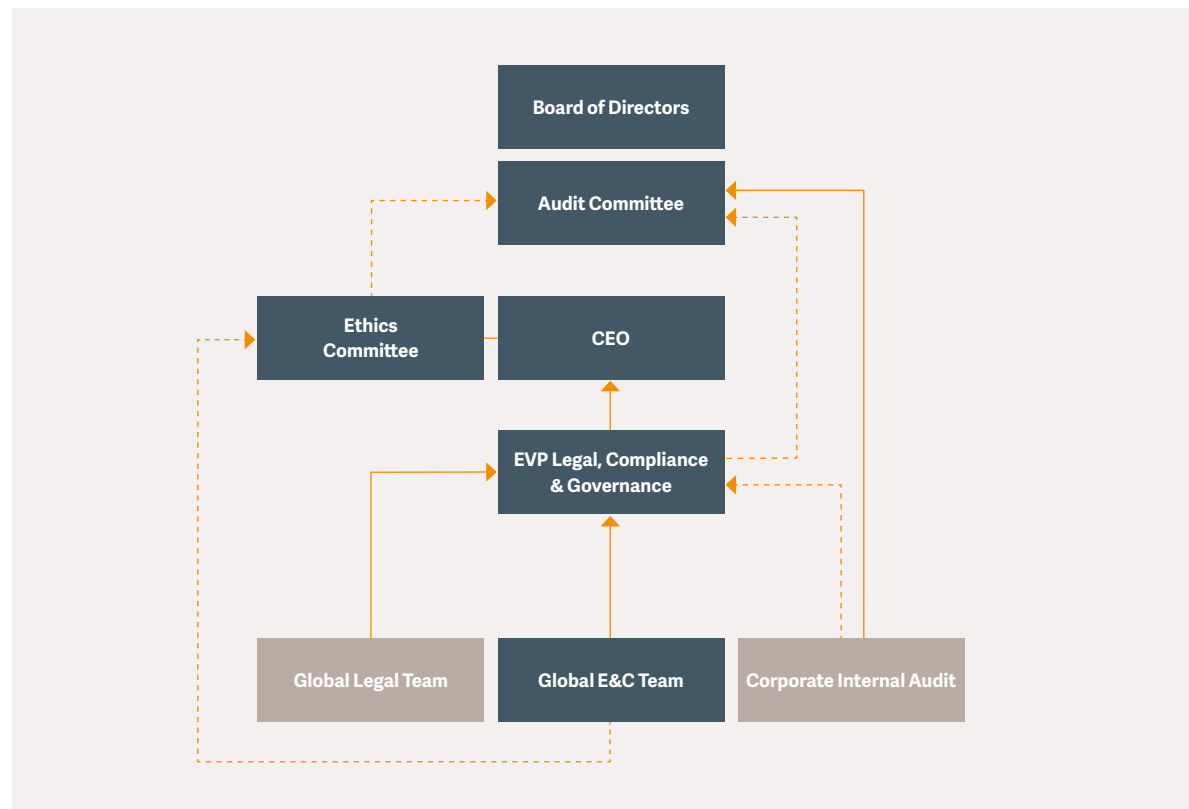
The Global Legal, Compliance and Governance team consists of the Global Legal team, the Global Ethics & Compliance (E&C) team and Corporate Internal Audit. Within the Global E&C team there is dedicated teams for operational support, internal investigations as well as data privacy and digitalization.

The operational Ethics and Compliance work is led by the VP Ethics & Compliance, who has the overall responsibility for ensuring that the Ethics & Compliance programs are

adequately designed, that implementation support is provided to the organization and that the implementation is followed up and reported to the Audit Committee of the Board of Directors and Getinge Executive Team. The Audit Committee receives updates on the Ethics and Compliance work at least once a quarter. The full Board of Directors receives an Ethics and Compliance update, including update on company risk profile, trends and ethics and compliance program implementation, at least once a year.

The Head of Internal Investigations is responsible for ensuring that all reports of suspected Code of Conduct violations or non-compliance are properly assessed, investigated and acted upon. The overall governing body for the Internal Investigations is the Ethics Committee which is a sub-set to Getinge Executive Team, the Ethics Committee meets at least five times a year, prior to each Audit Committee meeting, and on a needs basis. The Head of Internal Investigations is also

GOVERNANCE MODEL



responsible for monitoring remediation plans and for providing updates on these to the Ethics Committee and Audit Committee.

Getinge has identified seven main focus areas based on company risk profile: Antitrust, Anti-Bribery Corruption, Business Partners, Data Privacy, Human Rights, Interaction with Health Care Professionals, and Trade Compliance. A risk based compliance program is designed for

each area, with Human Rights being a new area for 2021. Each program has a Global program lead, who is reporting to the VP E&C. During 2021 we are implementing a process, supported by a tool, for more systematic follow-up of the implementation and effectiveness of the program.

Implementation support is provided through Regional E&C officers, who are supported by local E&C officers or legal counsels in specific countries. To

ensure that Responsible Leadership is a shared responsibility specific parameters on Ethics and Compliance has been added to relevant bonus plans. During 2021 we have developed a guideline for integration of ethics and compliance in the sales incentive plans and has also defined criteria for assessing ethics and compliance as part of the global short term incentive program.

Internal Investigations & Monitoring

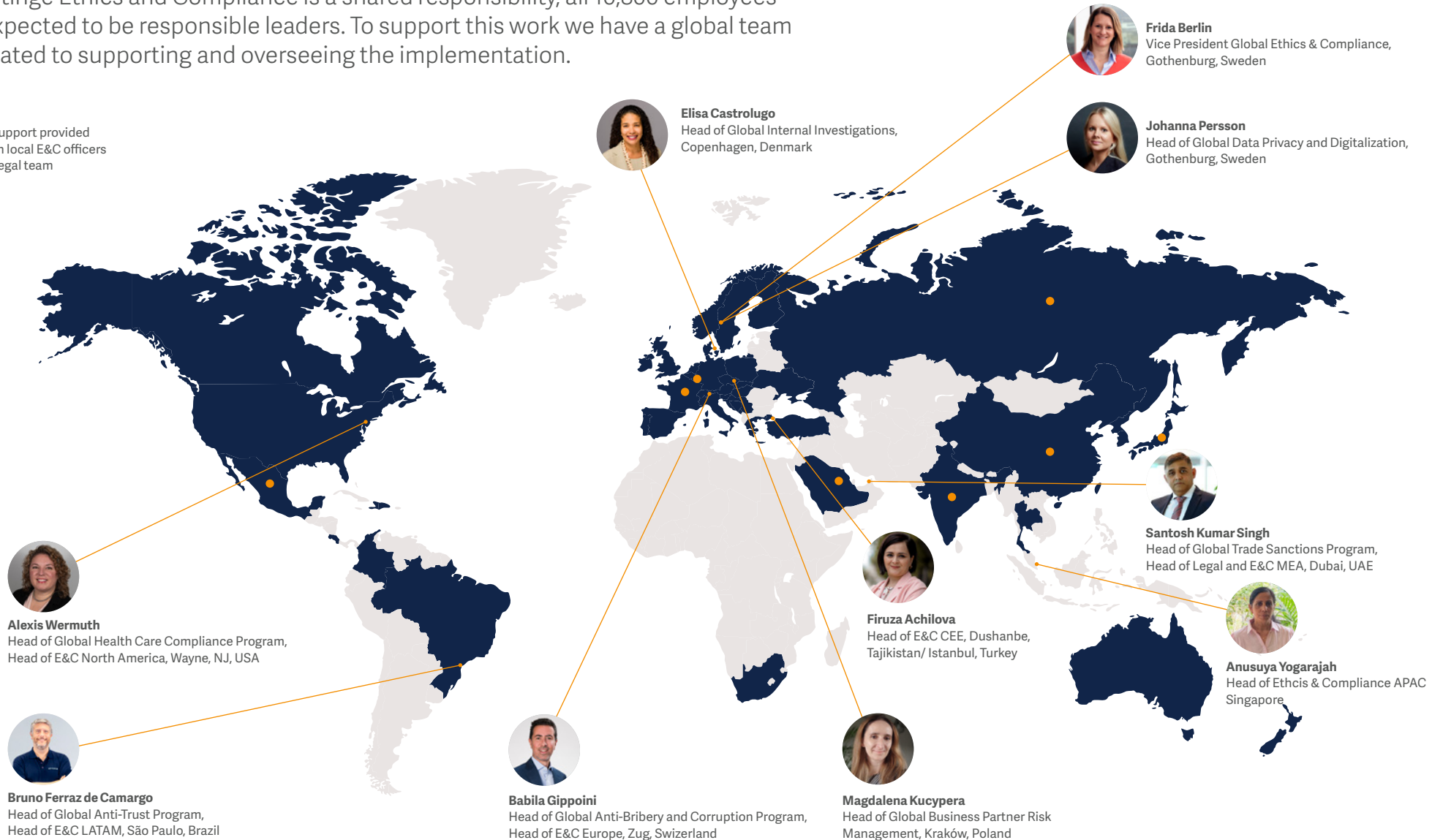
Getinge has an independent department for internal investigations and supervision that reports directly to the EVP Legal, Compliance & Governance.

The Getinge Ethics Committee is responsible for supervising the Internal Investigation Process and it determines if proposed responses, remediation and disciplinary actions are appropriate and sufficient. The Ethics Committee is chaired by the CEO.

The Global Ethics & Compliance Team

At Getinge Ethics and Compliance is a shared responsibility, all 10,800 employees are expected to be responsible leaders. To support this work we have a global team dedicated to supporting and overseeing the implementation.

● Local support provided through local E&C officers or the legal team



PRESENTING THE ETHICS & COMPLIANCE LEADERSHIP TEAM AND THE DRIVING FORCE BEHIND THEIR INTEREST IN ETHICS & COMPLIANCE



I'm passionate about my work as it gives me the opportunity to impact issues that are vital for the future. I strongly believe that all employees can contribute not only to Getinge's strategic objectives, but also to doing business the right way. My colleagues and I can help to enable a strong culture of business ethics through responsible leadership.

Frida Berlin

Vice President Global Ethics & Compliance

Location: Gothenburg, Sweden

Background: Bachelor in Business Administration, with marketing focus. Over 10 years' experience from creating and managing ethics and compliance programs in global companies including Elekta and Volvo Cars.



I believe in human beings and in their ability to redeem themselves if they commit errors and have been ethically unaware. We can support and help business run more smoothly and in a proper way.

Babila Gipponi

Head of Ethics and Compliance Europe – Global lead Anti Bribery Corruption Program

Location: Zug, Switzerland

Background: Legal background, served in legal and compliance roles mainly in the health care sector in various multinational companies, including GE and Zimmer Biomet.



To be able to influence corporate citizenship to tackle issues such as unfair trade, corruption and fraud as detractors of rightful living standards and human rights.

Bruno Ferraz de Camargo

Head of E&C LATAM and Global Lead Antitrust

Location: São Paulo, Brazil

Background: Lawyer, post-graduated in International Business Law and Business Administration, over 25 years of experience in private practice and inhouse counsel in the global legal and ethics & compliance field.



I strongly believe that business ethics and compliance are preconditions for running responsible business. Working in the due diligence field and verifying third parties that our company cooperates with, I am convinced that what I do matters and makes a difference for Getinge.

Magdalena Kucypera

Head of Business Partner Risk Management

Location: Kraków, Poland

Background: MA in Slavic Languages and Human Resources Management. International Diploma in Financial Crime Prevention. Over 10 years' experience in research, people management, due diligence and anti-money laundering/know your customer.



Contributing to the community of like-minded people to promote Business Ethics globally for positive changes. While working in development organizations, I realized the vulnerability and poverty of people is not only the lack of resources, but unethical decisions as regard to those resources.

Firuza Achilova

Central and Eastern Europe E&C Officer

Location: Dushanbe, Tajikistan / Istanbul, Turkey

Background: MBA in International Management, Certified Compliance and Ethics Professional - International, Diploma of Professional Internal Auditor. 18 years' experience in management functions in international organizations and companies. E&C Manager and Internal Audit Director in a telecommunication company for seven years.

PRESENTING THE ETHICS & COMPLIANCE LEADERSHIP TEAM AND THE DRIVING FORCE BEHIND THEIR INTEREST IN ETHICS & COMPLIANCE



I've grown up in a country where we always need a strong push to do things in the right way. This prompted me to look for career options where I can help people to adopt E&C as a way of working.

Santosh Kumar Singh
Head of Legal and Ethics & Compliance, MEA

Location: Dubai, UAE

Background: Former law enforcement, Bachelors of Law, Master of business Administration and BTEC Level IV from Edexcel in workplace investigation. Over 25 years in Legal and Compliance.



Professionally, I want to be a driving force for positive change in the organization and support Getinge in becoming the world's most ethical company. Personally, I want to use my knowledge and education to help creating a culture where everyone feels that they belong and that their voices are heard.

Alexis Wermuth
Head of Ethics & Compliance, North America

Location: Wayne, NJ, USA

Background: Bachelor of Science, Juris Doctor (JD) / Relevant Experience: Before coming to Getinge, I was the Ethics & Compliance Officer for the Renal Therapies Group of Fresenius Medical Care North America.



Human rights, finding pragmatic solutions, my interest in combining tech and law as well as working with such wonderful colleagues at Getinge.

Johanna Persson
Head of Global Data Privacy & Digitalization

Location: Gothenburg, Sweden

Background: Master of Laws, lawyer at two business law firms where she belonged to the IP, Tech and Commercial team, as well as to the Life Science team. She also has experience from an in-house legal team at a medical device company in Taiwan.



Being able to combine my business and legal knowledge with Getinge's business to find solutions that will help our business grow. It's like a mystery – trying to piece together the different pieces and then come up with a win-win solution. Doing business the right way will ensure sustainability – not only for the present but also for future generations.

Anusuya Yogarajah
Head of Ethics & Compliance APAC

Location: Singapore

Background: PhD in International Business & Law, lawyer with over 20 years' in-house legal and compliance experience in insurance and health care. Her expertise is in APAC, understanding the risks, cultural nuances and business requirements in the region.



A lifelong commitment to doing the right thing and serving a higher purpose.

Elisa Castrolugo
Head of Internal Investigations (Global)

Location: Copenhagen, Denmark

Background: U.S.-trained & qualified attorney, previously served in U.S. Department of Justice as federal criminal prosecutor for over 12 years.

Global Trends in Ethics & Compliance

The expectations on business ethics and responsible leadership is constantly evolving. At Getinge we monitor evolving expectations and risk to ensure that we work proactively. Three main trends, having significant impact on how work is conducted, are increased stakeholder expectations, cyber-attacks and data privacy as well as strengthened regulations.



Increased stakeholder expectations

Businesses are expected to incorporate expectations on ethical business practices. Business decisions are scrutinized, not only from a legal perspective, but from a wider stakeholder perspective. What is legal is not always the right thing to do, and long term consequences for the environment and society at large are expected to be considered. New employees are increasingly looking to work for companies which have a clear stance on environmental, ethical and social issues. Investors and financiers are looking at how companies are managing ESG matters and are asking for tangible data, evidence and impact. Increased stakeholder expectations, and a failure to meet these also lead to increased regulation.

To respond to these expectations we are conducting risk and impact assessments and developing a comprehensive change management program called #ItStartsWithMe. This program focus on developing responsible leaders throughout the organization.

Regulation

In the wake of corporate scandals and ethical shortcomings regulators respond with intensified regulation and renewed guidance for companies. The US Department of Justice provides detailed guidance for how companies are expected to implement ethics and compliance, and provide concrete questions to ask in terms of securing that the program is applied and effective, not only on paper but also in practice. The EU Whistleblowing directive raise the bar for companies in terms of securing confidential reporting channels and non-retaliation for employees who report concerns in good faith.

New regulation, on EU level, is also expected within the Human Rights field. In June 2021

Germany's Bundestag passed a law requiring companies to report human rights and environmental abuses along their direct supply chains. The focus on Human Rights abuses, and companies responsibility, is expected to increase. We are responding by launching an updated Business Partner Code of Conduct and formalizing our work through a Human Rights compliance program.

New regulation is also expected within the field of Artificial Intelligence. Compliance risks regarding AI relate to data privacy, but also to areas such as anti-trust and competition and algorithms pricing. Our Data Privacy and Anti-Trust programs are continuously updated to respond to new risks and regulation.

Cyber Security and Data Privacy

Cyber security threats are a reality, and during the last year several hospitals have been subject to attacks. The COVID pandemic has exponentially augmented the volume of transitioning patient data, which leaves more data exposed to attacks. Digitalization provides great opportunities, but every opportunity comes with a risk. The consequences may be severe both in terms of individual harm to patients and employees, damages to customer relations as well as costly penalties and fines.

We have rolled out an extensive Cyber security training programme to ensure awareness and vigilance, in addition we conduct review of our connected products to secure privacy and security compliance. Already when we start designing a product at Getinge, safe ways of handling data is built into the customer offering.

LESSONS LEARNED THE HARD WAY

Since 2017 Getinge has cooperated extensively with regulators to resolve allegations of misconduct in Brazil. In addition to cooperation with the regulators, we have taken action to secure that the misconduct will be prevented from occurring again. We are incorporating these lessons into our ethics and compliance work.

In April 2017, the Brazilian Federal Police launched Operation Compound Invoice. The investigation was based on allegations of a corruption, cartel and bid rigging scheme, involving the purchase of medical equipment by the Department of Health of the state of Rio de Janeiro and the National Institute of Traumatology and Orthopedics. Operation Compound Invoice involved Getinge's commercial representative, in addition to several national and multinational companies, including Getinge do Brasil, named "Maquet do Brasil" at the time.

Considering the reference to Getinge in Operation Compound Invoice, the involvement of its former commercial representative and the sales made, Getinge agreed to conduct an internal investigation in Brazil, focused on the allegations. Outside counsel conducted the internal investigation, coordinating all of its procedures and interacting with the Brazilian authorities.

During the internal investigation, new information about potential irregularities arose through interviews and document reviews. The original scope was then expanded to also investigate

fraud in public bidding proceedings involving third parties and commission payments to health care professionals for the use of products from Getinge.

The results of the internal investigation indicated company involvement of some of Getinge's employees in illegally modifying technical descriptions of public biddings proceedings and presenting cover proposals in order to steer them. It also indicated high commissions paid to Getinge's commercial representative, who coordinated the cartel and improper payments made by Getinge to health care professionals.

In light of the findings uncovered by the internal investigation, Getinge has implemented significant company wide remediation measures. These included terminating labor contracts with involved employees and commercial relationship with the companies involved. The measures also included compliance trainings and implementation of new policies and controls covered by Getinge's Ethics and Compliance Program. Meanwhile, global and Latin American Compliance Officers were appointed and cooperation with Brazilian and non-Brazilian public authorities initiated.

Timeline	
●	APRIL 2017 Launch of Operation Compound Invoice by the Brazilian Federal Police
●	MAY 2017 Getinge hires outside counsel for conducting the investigations
●	MAY/JUNE 2017 Beginning of internal investigation
●	APRIL 2018 New Ethics & Compliance head for Latin America
●	MAY 2018 Getinge signs a Leniency Agreement with the Brazilian Federal Prosecution Office
●	SEPTEMBER 2018 New Chief Ethics & Compliance Officer
●	SEPTEMBER – NOVEMBER 2019 Getinge signs two Cease and Desist Agreements and one Leniency Agreement with the Administrative Council for Economic Defense
●	OCTOBER 2020 EVP Legal, Compliance and Governance appointed to Getinge Executive Team



Operating with integrity and with high standards creates value for customers and for the societies in which we and our customers operate.



Mattias Perjos, President & CEO Getinge

COMMENT FROM THE PRESIDENT AND CEO

Doing the right thing when no one is watching

"As a MedTech company we have a broad responsibility towards all our stakeholders, to customers employees, authorities and the wider society. To live up to the stakeholder expectations we focus on responsible leadership as an integral part of our culture. But responsible leadership is not only about fulfilling expectations, it is about doing the right thing when no one is watching. Operating with integrity and with high standards creates value for customers and for the societies in which we and our customers operate.

Unfortunately there have been instances when we have failed to act with the highest standards of transparency and integrity. Some of our historical business dealings in Brazil did not hold up to these

standards. During the last four years we have focused on doing the right thing, cooperating with the authorities, changing local management and our operating model, terminating business partner relationships and invested heavily in ethics and compliance, not only in Brazil but globally.

I am proud of what we have achieved and for what we will continue to achieve. The business landscape, stakeholder expectations and risks are evolving and we are prepared to manage these in a proactive way. Responsible leadership is about daily decisions, it is about ensuring that we consider all stakeholders and a longer time horizon in our business dealings. And it starts with me and all of our employees, every day."

Responsible Business – Our Code of Conduct

Getinge's Ethics & Compliance work is centered on Responsible Leadership. The main purpose is to enable and inspire all employees to demonstrate responsible leadership and to foster an open and transparent culture.

At the beginning of 2020, Getinge introduced a new Code of Conduct. It sets down Getinge's guiding principles for how professional interactions should be conducted, every day, internally and externally, with customers and business partners. The new Code of Conduct is based on six principles:

- 1 **Always act with honesty, fairness and integrity**
- 2 **Stand up and speak up when something isn't right**
- 3 **Act respectfully to protect confidentiality, privacy and information**
- 4 **Take care of each other**
- 5 **Take care of the world**
- 6 **Act together to protect all stakeholders.**

Both the regulatory landscape and expectations from stakeholders are constantly evolving. With the new Code of Conduct, Getinge aims to provide a platform for change, rather than a static document. By showing colleagues how the principles can apply to both their everyday work, as well as to challenging situations, everyone can learn where it is possible to go above and beyond in their work commitment.

A Dilemma Game to raise awareness

Several training courses and activities were arranged throughout 2020 with the aim to increase awareness about the new Code of Conduct, since it is crucial that all employees should know and comply with all policies. These included the e-learning Getinge Dilemma Game, in which

real-life ethical dilemmas from the organization were presented to all non-production employees for discussion. By the end of 2020, 8,896 employees, including managers, had completed the e-learning courses. The post training evaluation score was 4.48/5.

Total of 868 employees in production have received a training on ethical dilemmas since first quarter of 2021.

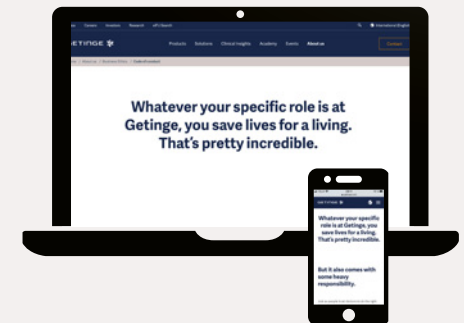
In addition to the e-learning, training were held on topics such as Ethical Blindness, Lessons Learned, Anti-Trust, Anti-Bribery & Corruption, Data Privacy and Money laundering & fraud during the year. In 2020, 7,256 employees were trained both in face-to-face and virtual workshops.



Doing responsible business in all relations, in the company's own organization and in external contexts, is a key part of Getinge's strategy.

Increased learning on-line

In 2020 Getinge increased the use of on-line tools for training on ethical and compliance issues. This resulted in more co-workers being trained than ever before and good post training evaluation scores.



Access Getinge's Code of Conduct at www.getinge.com/code-of-conduct/

Our Ethics and Compliance Program

Getinge’s Ethics & Compliance Program is focused on the main risk areas that the company has identified with regard to business ethics.

Getinge has identified seven main compliance risk areas; Antitrust, Anti-Bribery Corruption, Business Partners, Data Privacy, Human Rights, Interaction with Health Care Professionals, and Trade Compliance. Separate programs have been implemented for five of the focus areas. The work with Business Partners is integrated within each relevant focus area and during 2021 we have initiated work to design a formal program for Human Rights.

Ethics & Compliance Program

The Ethics & Compliance program consists of nine program steps, or steps, based on the model described as “effective compliance program” and “adequate procedures” by Society of Corporate Compliance & Ethics, Foreign Corrupt Practices Act, US Sentencing Guidelines and the UK Bribery Act Guidance, for example.

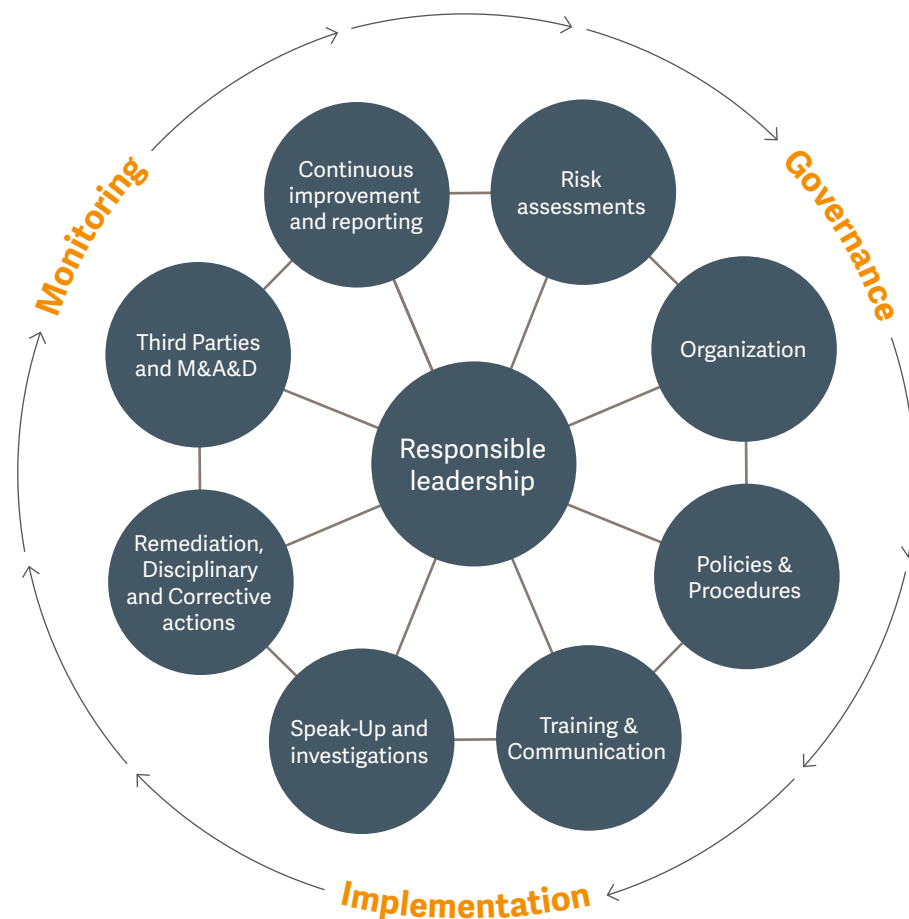
The Getinge Ethics & Compliance program serves as a method and tool for ensuring that adequate procedures are in place to prevent Getinge from taking part in any corrupt business practices, and that the company

adheres to applicable laws and regulations, as well as relevant ethical standards including the Getinge Code of Conduct, as well as global policies and directives.

Responsible leadership

Responsible Leadership is at the core of our program and means involving all employees to set the standard and act as role models for ethical behavior and professional integrity. Activities in this area provide the conditions and requirements for Getinge’s employees to ensure business is conducted in an ethical and responsible manner, in all internal and external contexts.

To clarify and deepen the meaning of the term, Getinge is developing a comprehensive change management program called #ItStartsWithMe. This program focus on developing responsible leaders throughout the organization and aims to create interest and personal engagement by providing insights and understanding of the challenges and complexity of the subject. The Program will be launched at the end of 2021.



KEY DEVELOPMENTS DURING THE PAST YEARS

Over the last two years, Getinge has made significant investments and improvements to strengthen its Ethics & Compliance program. Key development areas include:

Risk Assessments

During the last two years we have initiated Anti Bribery and Corruption risk assessments in China, Germany, Italy, Mexico, Spain and the Middle East and Africa region. We have developed a formal protocol for conducting the risk assessments, and use forensic expertise when assessed relevant.

Policies & Procedures

In 2019, Getinge introduced a new Global Policy framework consisting of 14 global policies and related directives. During the past year, the Global Policies have been reviewed and the following policies have been updated: the Data Privacy Policy, Trade Compliance Policy, Financial Policy and Purchasing Policy. The Global Policies have been translated into twelve languages and are available for all employees on the company's intranet, as well as publically available on Getinge's website. Check out Getinge's Global Policies on www.getinge.com/code-of-conduct/policy-summaries/

14

Global policies were introduced by Getinge in 2019

Training & Communication

In 2020, one of Getinge's main activities was to increase knowledge among employees in the area of Antitrust & Fair Competition. This included tailored training courses, which were rolled out in all of the company's sales regions. In total, 2,802 employees were engaged in interactive virtual workshops during the year. The Sales and Marketing Development program also included a full Antitrust and Fair Competition workshop, specially designed to address commercial issues and needs. At the beginning of 2021, the Antitrust and Fair Competition e-learning "Win Fair" was rolled out to all employees globally. So far, 6,871 employees have completed the anti-trust e-learning program consisting of three modules.

In addition to our virtual interactive trainings, the virtual dilemma game and anti-trust training we are developing an e-learning training library for Anti Bribery and Corruption and Interaction with HCP. We are also rolling out a dilemma game/ Code of Conduct training for production employees.

8,896

Employees completed the virtual Dilemma Game e-learning in 2020.

9,991

Employees were trained in interactive face-to-face or virtual workshops during 2020 and 2021.

Training KPI

All employees should receive Business Ethics related training at least once a year.

85.3%

of all non-production-related personnel had completed Getinge Dilemma Game.

Speak-Up and Investigations

Getinge is committed to open and transparent communication, internally and externally. All employees are encouraged to report any suspected or observed violations of the law or the corporate Code of Conduct. In 2020, 50 reports of suspected misconduct were recorded and investigated by the Internal Investigations team. 28 reports were received through Getinge's reporting tool (Speak-Up Line), and 22 reports through other channels. After thorough investigations, including interviews, document reviews and an objective assessment of facts, disciplinary actions were taken in eight cases.

50

Reports of suspected misconduct were recorded and investigated by the Internal Investigations team in 2020.

Continuous Improvement & Reporting

In January 2020, Getinge launched an all-employee Business Ethics Awareness survey to measure the organization's perception of how well the company lives up to its values. In 2021, the Business Ethics Survey was completed for the second time. A total of 4,496 employees from all over the world participated in the survey, a major increase compared to the previous year. A majority of the respondents, 76%, felt that managers within Getinge clearly communicate the meaning and importance of responsible leadership.

4,496

Employees from all around the world participated in the Business Ethics Survey in 2021.

76%

of respondents felt that managers within Getinge clearly communicate the meaning and importance of responsible leadership

Third Parties and Mergers, Acquisitions & Divestitures (M&A&D)

To manage third party representative risk, a mandatory third party engagement process was launched in March 2020. Since then, all new as well as potential, distributors and agents, integrators (general contractors), public-private partnerships, as well as GPOs (Group Purchasing Organizations), IDNs (Integrated Delivery Networks), Clinical Service Providers – if acting in a distributor's or agent's capacity – must go through a due diligence process. Simultaneously, screening of existing distributors and agents has been initiated, working from region to region. To date, 251 new and 525 existing distributors and agents have been screened, of which 51 third parties were denied.

251

New business partners have been screened, whereof 20 were denied.

525

Existing business partners have been screened, whereof 31 were denied.

GETINGE ✱

SPEAK UP. WE'RE LISTENING.

We all try to do the right thing, the right way. But the hardest part of this is speaking up when things aren't right. Sometimes that's speaking up for ourselves, but more often than not, it's standing up for others and what is right. Getinge always listens when concerns are raised.

Our Speak Up line is available online or by your local telephone lines listed on the Speak Up site. Reports can be made anonymously and in your language. You can also use Speak Up to ask questions about the Code of Conduct.

HOW TO REPORT A CONCERN:

- Raise Your Concerns with Your Manager or Local HR
- OR
- Raise Your Concerns with Ethics & Compliance
- OR
- Raise Your Concerns through the Getinge Speak-Up Line

Free call:
(ADD Local Number)

Speak Up Line:
www.getinge.ethicspoint.com

Speak Up Line QR code

Our Code of Conduct and Directive on Speak Up and Non Retaliation can be found on the intranet.

Speak Up – We're Listening

At Getinge all employees are encouraged to report any suspected or observed violations of the law or the corporate Code of Conduct. During the last year we have increased our efforts to create psychological safety where employees feel comfortable raising concerns.

Getinge Speak Up Line is an externally hosted whistleblowing hotline. This tool enables anonymous reporting via a website or telephone in local languages. It is open for Getinge employees as well as for suppliers, distributors and other business partners. Employees are encouraged to first seek to address the issue with their manager or a local Human Resources representative. If the employee for some reason is uncomfortable with this, they can also contact another manager, the Ethics & Compliance Department, or the Legal Department.

At Getinge we have implemented a web based reporting tool, that is available in 11 languages. We have a strict policy for non-retaliation and provide training to managers on our internal investigation process, lessons learned and retaliation.

The Speak Up Line can be found on the Getinge Intranet as well as on the Getinge website. The Ethics & Compliance team assesses all

reports of suspected misconduct and Code of Conduct violations. Internal Investigations and Whistleblowing cases, including remediation plans, are reported and monitored through the Ethics Committee.

In 2020, the message that Getinge should represent a "speak up culture" was conveyed globally throughout the company, via management communications, such as e-mails and newsletters directed to all leaders.

The Speak Up Line was updated with additional languages and a poster campaign on the theme "Speak Up We're Listening" was rolled out together with a guide for managers on how to encourage an environment of openness and trust, where employees feel comfortable to speak up.

11

Number of language versions of Getinge's web based reporting tool for Whistleblowing

Anti-Bribery Corruption

As a global medical technology company we provide equipment and systems within health care and life sciences to public and private customers in 125 countries. We take part in public tenders and collaborate with business partners such as distributors and integrators. For us it is of utmost importance to manage the risk for bribery and corruption in all our business transactions.

Responsible Leadership in Global Sales

Getinge interacts with hospitals and life science institutions all over the globe. The company has a great responsibility both in terms of patient safety, but also in terms of how public funds are spent in relation to its products and services.



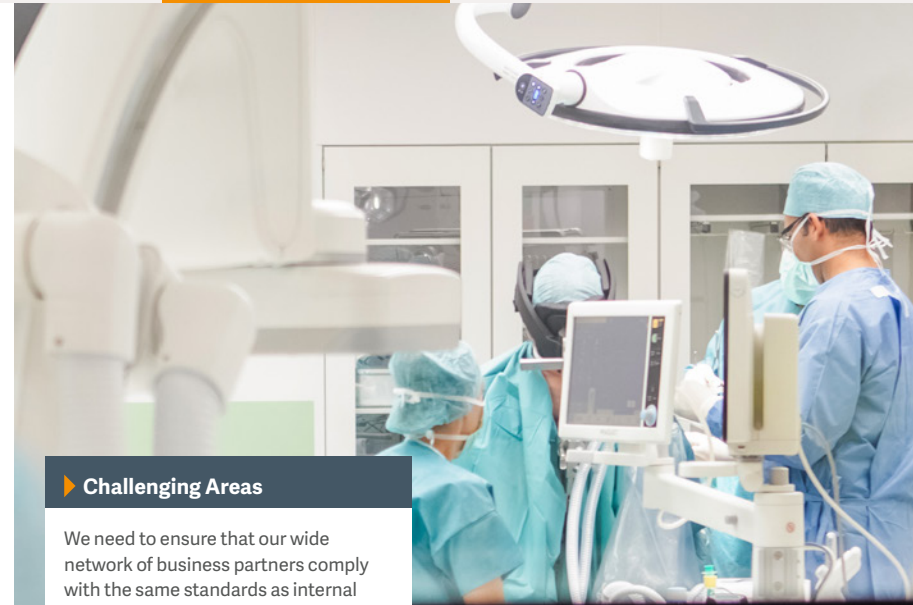
Carsten Blecker, Chief Commercial Officer

Getinge's Global Sales team works continuously to ensure that ethics and compliance as well as responsible leadership are integrated parts of Getinge's commercial operations. With operations in 39 countries, Getinge is heavily reliant on business partners that can be trusted and that embrace Getinge's way of working. "We onboard our distributors and agents in the same way as we would onboard our direct team members and we have the same expectations from them to conduct business in an ethical and compliant way," says Carsten Blecker, Chief Commercial Officer.

To ensure that risks are managed in relation to an extensive network of sales related business partners, Getinge has established a dedicated "Business Partner risk management team" as part of the company's Shared Services in Krakow. The team consists of 5 experts continuously supporting the operations in terms of conducting business partner risk assessments and due diligence. Getinge also uses

outsourced services to ensure timely execution and support. "To appoint a third party partner in the first place there needs to be a sound business rationale; if the latter exists either our internal specialized team and/or externally contracted specialized service providers will conduct a due diligence process on our potential partners and only if the outcome is satisfactory we will engage contractually. In higher risk situations we will redo such process on a reoccurring basis," says Carsten.

A set of minimum criteria, that must be integrated in the regional sales incentive plans in relation to ethics and compliance, have been implemented. This way, Getinge wants to ensure the right behavior and show that ethics and compliance is not about saying, but by doing. "We have reviewed and adapted both sales incentives of direct employees and sales agent opting for local best practices which take into consideration market idiosyncracies but also avoid that variable compensation would follow an exponential



Challenging Areas

We need to ensure that our wide network of business partners comply with the same standards as internal employees. We also want to find long term partners to work with that are committed to the same standards as us.

Current Focus

In 2020, Getinge established a Business Partner Due Diligence team as part of its Shared Services centre in Krakow. Getinge also reinforced its escalation processes for the onboarding of high-risk business partners. Since 2020 high risk business partners, such as agents and distributors, are onboarded according to the new process. We are also conducting a review of all existing business partners and are prioritising high risk regions.

Looking Ahead

During the upcoming period the focus is to roll out its business partner risk management program, including implementation of a new contract management tool, renewal of contracts and implementation of monitoring processes.

776

Business partners due diligence screenings completed during 2020 and 2021

793

Business partners trained in interactive face to face or virtual trainings during 2020 and 2021

100%

Global Sales employees completed Dilemma Game training in 2020

unlimited curve; in some cases we have increased base pay while reducing and / or capping or de-accelerating variable compensation. In the case of our agent we also have defined clear ranges of what we deem appropriate to compensate our partners and have defined a clear need to match the latter with the specific services rendered," says Carsten.

At the end of 2020, Ahmet Eke, President Sales Region Central and Eastern Europe, was appointed as Global Sales Ethics Ambassador as part of the Global Sales Management Team.



INTERVIEW AHMET EKE, PRESIDENT SALES REGION CENTRAL AND EASTERN EUROPE & GLOBAL SALES E&C AMBASSADOR

You were recently appointed Global Sales Ethics & Compliance (E&C). What have been the biggest learnings so far?

"Biggest learning for me is that E&C is like an ocean and there is no end in learning and development. The more we learn, the more we make our organizations and companies safe and sustainable."

Why is Responsible leadership so important?

"Leadership is a responsibility. It means the actions that we take may have consequences not only for ourselves, but also for the people in and outside of our organization. And as responsible leaders, we need to develop not only ourselves, but also the people around us and their teams."

What are your thoughts on strengthening a Responsible Leadership culture within Global Sales?

"We must be aware that it will require a strong effort from both leaders and employees and we will not reach the ideal level at once. We need to have a sense of urgency to continuously improve in this area in order to become even more secure and sustainable as fast as possible. We need to start now. Also, we need to keep in mind that E&C is not something that you can delegate or wait for another person to manage, instead of us."

How do you perceive Getinge's corporate culture (locally or globally), which challenges and risk do you see from an E&C perspective?

"Getinge has been growing mainly by mergers and acquisitions, so there are several different historical cultures in the company. Also, we are conducting business globally in several different geographies. Culture is a very important element in the sense that it gives direction to people's actions – but it can also create huge risks. We need to be aware that the medical industry and markets are being more and more regulated every year and our cultural moves cannot be excuses for any misconduct. We cannot choose to move with cultural motives, if it is in conflict with ethical or legal rules."



As responsible leaders, we need to develop not only ourselves, but also the people around us and their teams.

Ahmet Eke, President Central and Eastern Europe & Global Sales E&C Ambassador

Antitrust

Getinge operates on 125 countries, both through our own operations and through an extensive network of distributors. We have learned the hard way how important it is to secure fair competition and ensure that hospitals, and taxpayers do not suffer from unfair competition.

Competing Fairly

Continuing saving lives, but only working with stakeholders operating according to the same ethical principles. This was one important lesson learned for Getinge after experiencing competition turmoil in Brazil.

"After being with Getinge for almost four years, I can proudly say our executive team has walked the talk on their commitment and supported Latin America enormously in its journey towards ethical awareness," Marcio Mazon, Getinge's Regional President for Latin America, comments. Lessons learned have resulted in increased global focus on ethical issues throughout the Getinge organization.

The Global Antitrust & Fair Competition Program is a specialized subject matter within the Ethics & Compliance Program and is designed in full adherence of the applicable standards by regulators throughout the US, the EU and all competition authorities in countries where Getinge operates. The program leadership has been assigned to Bruno Ferraz de Camargo, a lawyer qualified in Brazil and in the European Union with substantial international legal & compliance expertise and exposure on competition law matters.

"I joined Getinge in early 2018, just in

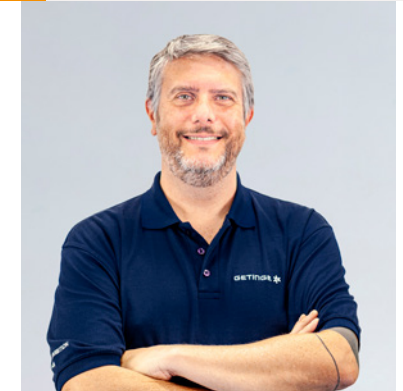
time for the first round of settlement negotiations with the Brazilian authorities, and it was clear from the start that the topics concerning fair competition were one of the most sensitive issues to be addressed by the Ethics & Compliance program. During the initial risk assessments on global level, it was also clear that we needed to act fast, and not only in Brazil, to provide education, awareness and remediation of certain practices which we successfully implemented during the last years", he says.

It was known in the local Brazilian medical device industry that Getinge, and other market players, didn't operate with the highest standards and that as a consequence federal authorities probed such companies and some, including Getinge, agreed in leniency cooperation. Marcio Mazon joined Getinge as its Brazilian legal representative during the turmoil.

"It took courage, but was an easy decision after I met with our executive team. They all transmitted confidence on their commitment to operate in



Marcio Mazon, Getinge's Regional President for Latin America



Bruno Ferraz de Camargo, Head of E&C LATAM and Global Lead Antitrust

compliance with local laws and with responsible leadership. I found an immediate cultural fit! It became clear to me that our priority was to continue saving lives involving only stakeholders operating with the same ethical principles," he says. The approach used for ensuring awareness and knowledge establishment for the entire global organization was in brief:

- Regional Ethics & Compliance Officers and legal counsels received several "Train the Trainer" sessions and a training package with presentations and speaker notes to deploy the content within their regions. Special adjustments were done when a local requirement demands, such as in China.
- An online "e-learning" was launched in April 2021, covering the basic principles of competition law sent to all Getinge's employees, alongside several face-to-face trainings targeted to selected audiences.

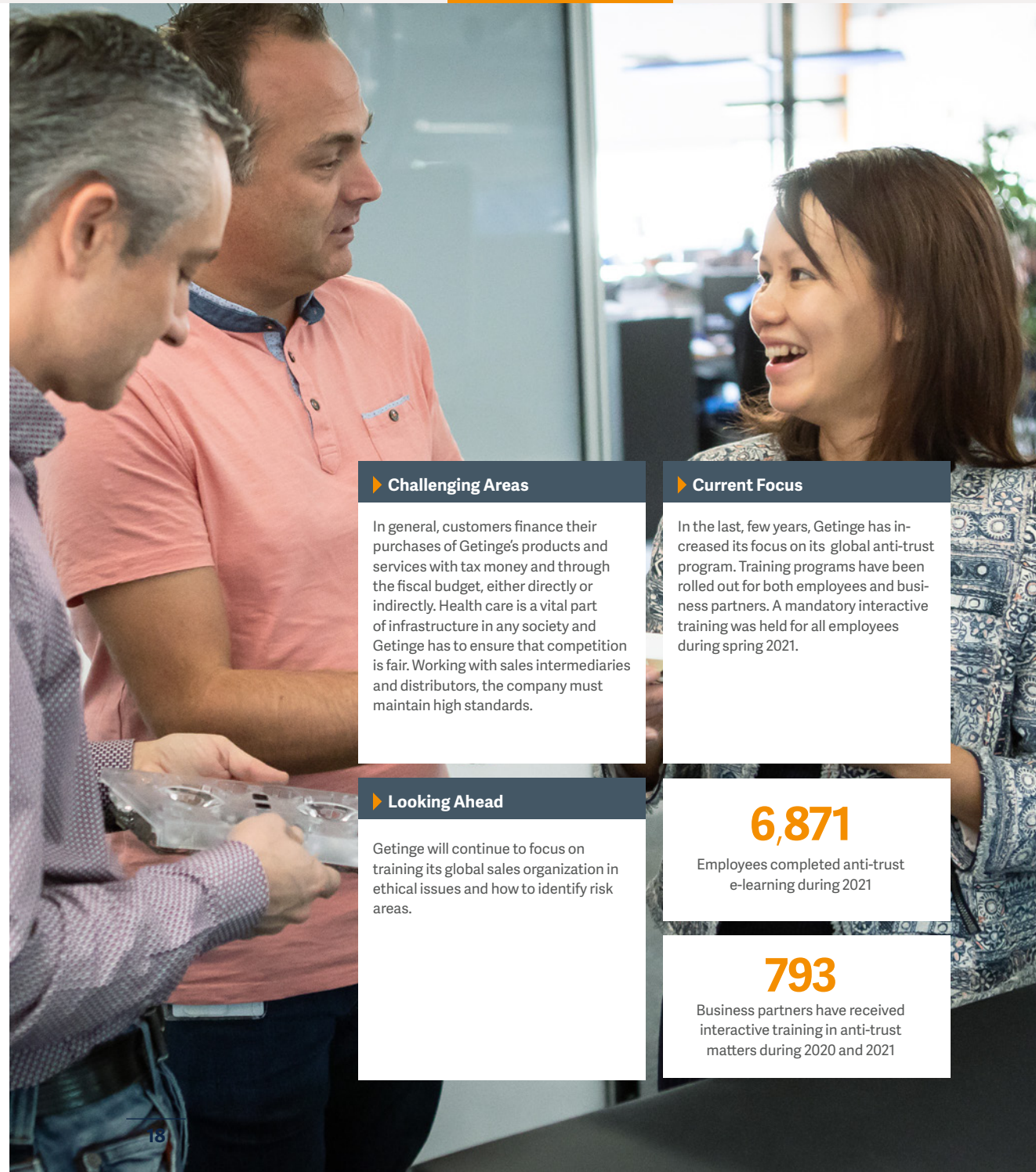


It took courage, but was an easy decision after I met with our executive team. They all transmitted confidence on their commitment to operate in compliance with local laws and with responsible leadership. I found an immediate cultural fit! It became clear to me that our priority was to continue saving lives involving only stakeholders operating with the same ethical principles

Marcio Mazon, Getinge's Regional President for Latin America

Among several positive impacts in the global business organization, after the trainings have been deployed a number of important lessons have been learned and currently are being addressed by the respective regions whenever conducting their regular business affairs:

- The contractual separation of sales intermediaries such as distributors and agents and understanding that these two forms have distinct impact on antitrust regulations. New distribution agreement templates have been drafted and are in process of deployment.
- Risk mitigation to map and avoid abusive exploitation of a dominant position. Examples of this measure have been a dedicated focus and formalization of processes of selection of distributors and pricing to avoid discriminatory practices whenever granting discounts or special conditions.
- Creation of a process within the M&A activities to ensure the avoidance of "Gun Jumping" in operations that require prior authorization from the antitrust authorities concerned.
- Getinge Financial Services have adopted a self-assessment for cases where financial offers are made to provide combined offers of capital equipment and accessories to selected customers. This measure is important to mitigate risks of abusive conduct related to tying and bundling, which can be illegal in some jurisdictions.
- As part of the remediation process in Brazil, a dedicated tender department has been put in place to ensure exchanges of information among distributors, competitors and public procurement is done within the limits of what is permitted by the applicable regulations.



Challenging Areas

In general, customers finance their purchases of Getinge's products and services with tax money and through the fiscal budget, either directly or indirectly. Health care is a vital part of infrastructure in any society and Getinge has to ensure that competition is fair. Working with sales intermediaries and distributors, the company must maintain high standards.

Current Focus

In the last, few years, Getinge has increased its focus on its global anti-trust program. Training programs have been rolled out for both employees and business partners. A mandatory interactive training was held for all employees during spring 2021.

Looking Ahead

Getinge will continue to focus on training its global sales organization in ethical issues and how to identify risk areas.

6,871

Employees completed anti-trust e-learning during 2021

793

Business partners have received interactive training in anti-trust matters during 2020 and 2021

Business Partners

Getinge has recently revised its Supplier Code of Conduct. The aim is to increase focus on responsible sourcing. The result is a new Business Partner Code of Conduct that has been extended to include all of Getinge's business partners and has a renewed focus on Human Rights. Getinge's purchasing function is responsible for implementing the new Code with support from the Ethics & Compliance team.



Tobias Dock, Senior Manager Purchasing Development



Gustav Svensson, Head of Purchasing

Focus on a Sustainable Supply Chain

Getinge has recently revised its Supplier Code of Conduct. The aim is to increase focus on sustainability and responsible sourcing. The result is a new Business Partner Code of Conduct that has been extended to include Getinge's all business partners.

Getinge's purchasing function is responsible for implementing the Business Partner Code of Conduct and the Sustainable Sourcing Program, with support from the Ethics & Compliance team. "We believe, and see evidence of, that long term supplier relations are key to adding unique value together with our suppliers," says Tobias Dock, Senior Manager Purchasing Development at Getinge. Together with Gustav Svensson, Head of Purchasing, he has managed the establishment of the new Business Partner Code of Conduct for the company.

In 2020, the function for Purchasing Development at Getinge worked on improving the company's supplier

qualification process and revised the purchasing policy in cooperation the Quality function. The supplier qualification process is based on applicable laws and regulations, ISO-certification etc. Meanwhile, the interaction with suppliers in frequent and regular meetings are an essential part of driving improvements and securing a long term strategic fit.

The new Business Partner Code of Conduct aims at ensuring that Getinge's suppliers act in compliance with the company's business principles and values. Getinge is selective and focuses on so called Preferred Group Suppliers. New suppliers are selected though a thorough review. "We start

with a global perspective and a detailed understanding of individual supplier capabilities,” says Gustav Svensson. “We connect this to our values and look for suppliers sharing those values as we find that this is the most efficient way to secure compliance and joint value creation over time.”

Increased expectations

Getinge works hard to meet increased expectations from external stakeholder. “We try to integrate these expectations in our day-to-day work in a way that is natural and relevant to us. Our focus is on how we can live up to the expectations. We call it Responsible Sourcing,” says Tobias Dock.

While the world is changing, Getinge sees new challenges in increased market dynamics and geopolitical aspects. New regulation and higher stakeholder demands on securing human rights throughout the supply and value chain demand increased efforts and a proactive approach. The challenge is to capture global opportunities, while facing these uncertainties. There is also a transparency challenge, i.e. how to build necessary transparency in all dimensions and levels. “There



Absolute key in making this work is personal ownership and a will to do the right thing.

Gustav Svensson, Head of Purchasing

is a risk of losing crucial competitiveness if we fall behind in our work to address these challenges,” says Gustav Svensson.

To do right

Getinge aims for an integrated approach and that the processes, systems and tools that the company create and establish should be relevant and support the organization in doing the right thing and being compliant. Key is to make it as simple as possible to act responsibly.

“From our Purchasing Policy all the way down to operating procedures and systems or tools, we look for that connection to our values. We see this starting with our revised Purchasing Policy and in our new Business Partner Code of Conduct, which is being developed and rolled out this year,” says Tobias Dock.

Personal ownership important

There are challenges with meeting global rules and regulations regarding purchasing. One is to put a global perspective on local dimensions and to translate the expectations into concrete actions that makes a difference. Another is the co-ordination and effective execution of those actions, both internally and externally. “Absolute key in making this work is personal ownership and a will to do the right thing. It’s about acting responsibly on a personal level and that ownership is taken throughout the company,” says Gustav Svensson.



Challenging Areas

Implementing a retroactive due diligence process for existing business partners.

Current Focus

Roll-out of the business partner Code of Conduct, including a monitoring program. Continue to develop the M&A process to ensure systematic assessment of E&C risk during both pre- and post-acquisition phases.

Looking Ahead

New regulation on EU level with regards to mandatory on Mandatory Human Rights, Environmental and Good Governance Due Diligence (“MHRDD”) is expected to be adopted by the EU Parliament later this year. The German Parliament (“Bundestag”) adopted the “Act on Corporate Due Diligence in Supply Chains” (Supply Chain Due Diligence Act – “Act” or “LkSG”) on 11 June 2021. The Act imposes, for the first time, a binding obligation on companies to establish, implement and update due diligence procedures to improve compliance with specified core human rights and, to a limited extent, environmental protection in supply chains.

547

Business Partners have received face-to-face or virtual training on E&C matters

Data Privacy

Maintaining customer trust in the security of and safety of its products is critical for Getinge. In addition, the importance of data privacy and the integrity of personal data is a constantly increasing. Meanwhile, the company needs to protect its most valuable assets against cyber threats. To secure data privacy and security we have formalized our related programs throughout the organization.

Digitalization Adds Value to the Health Care Industry

Digitalization is paramount to deliver more and better health care to an aging population. Getinge is continuously adding new functions to its software solutions, is offering an increasing number of hospitals around the world the advantages of digital technology.

Better working conditions, reduced administration and less stress are all crucial parts of improving working conditions for health care workers. Getinge simplifies processes in hospitals, reducing the training need, enabling overview, supporting coordination and reducing administration. "This means, on top of improved employee satisfaction, that the hospital's resources can be optimized ensuring that more patients get the best treatment," says Charlotte Enlund, Vice President Integrated Workflow Solutions at Getinge.

Benefits all parties

An organized work environment, in which the whole team is encouraged to work together, provides the right prerequisites for a calm and soothing experience for the patient. This could include elective surgeries being performed on time, or the alarms in intensive care units being silenced by the bedside and instead immediately notifying the right care giver.

"The beauty of digitalization is that

there is a potential for improvements for all stakeholders, if the proper tools are properly implemented. These include economic benefits for society, better financials for the hospital, improved working conditions for the staff and better patient care. It can also lead to economic benefits for Getinge, enabling us to invest further in our solutions to widen their scope and provide even better functionality to all," says Charlotte Enlund.

Getinge has long experience of working together with its customers within intensive care, cardiovascular procedure, operating rooms, sterile reprocessing and life sciences, with the aim to improve clinical and economic results.

"Our operating room management and sterile supply management solutions have been developed over the last 25 years, so digital solutions are not new to us, but rather continuously evolving and improving. Lately, we have incorporated a machine learning functionality to ensure even better performance results," says Charlotte Enlund.



The beauty of digitalization is that there is a potential for improvements for all stakeholders, if the proper tools are properly implemented.

Charlotte Enlund, Vice President
Integrated Workflow Solutions



A healthy skepticism

During the early stages of digitalization, hospitals faced challenges with solutions not realizing the claimed benefits. "This has resulted in a healthy skepticism towards digitalization. Immature solutions, with unproven benefits, can result in frustration and wasted time, instead of expected improvements. There is always a risk when a new digital solution is implemented that it doesn't live up to expectations and instead becomes counter-productive," says Charlotte.

Cyber security threats constitute another risk. "Almost all hospitals and companies around the world are subject to threats of being attacked. Cyber attacks are increasingly pinpointed at loopholes in the least expected areas. Hospitals, however, in general have high security standards, regulations are constantly evolving, and well-established software is continuously developed to fence off attacks."

"We are developing our cyber security protection day by day to ensure

we are doing everything we can to meet the challenges," says Charlotte Enlund.

Increased focus on data privacy

Data privacy is a topic which has evolved quickly over the last decade. Both awareness and regulations have developed. Getinge's solutions are designed to ensure information is only accessible for the right staff at the right time. There are restrictions regarding who can access what information and the hospitals can check which staff member viewed certain information.

"In health care big data, that is interpreting large volumes of data to understand patterns and find root causes, actually saves lives. I believe the upside of digitizing the health care industry far outweighs the potential drawbacks. Having said that, we work to reduce the risks every day," says Charlotte Enlund.

Increasing Efforts to Ensure Cyber Security

Maintaining customer trust in the security and safety of its products is becoming increasingly vital to ensure the future success of Getinge. Meanwhile, the company needs to protect its most valuable assets against cyber threats. To enhance its focus on cyber security, Getinge has decided to formalize cyber security procedures throughout the organization.

Cyber security is centered on protecting electronic data found in computers, servers, networks, mobile devices, etc. from being compromised or attacked. It is an evolving discipline, and something that requires good planning, governance and sustainable processes to protect the business from active threats today and in the future. It has also gained increased relevance as cyber attacks are becoming more and more common on sensitive targets, including hospitals. The COVID crisis has exponentially augmented the volume of transiting patient data, which has resulted in an increasing number of cyber attacks, targeting this valuable data.

Christoffer Åkesson, Chief Information Security Officer at Getinge, says that this is one of reasons why the company has decided to step up its efforts to increase cyber security measures.

“Ultimately, it’s about ensuring future growth and innovative strength. We need to protect our business from

espionage and disruptions to safeguard our investments in innovation and intellectual property.”

Christoffer Åkesson adds that solving cyber security issues if, and when, they arise will save Getinge time and costs. “It is also competitive tool; trust can create a competitive advantage for the company,” he says. To date, Getinge has not had any security breach that affected business.

Governance is vital

Cyber attacks are inevitable as society becomes more and more digitalized. Getinge’s focus is on solutions that anticipate, detect and respond to threats, using the most effective means of protection for the information most at risk.

“Security is a business imperative. To protect Getinge’s information, extensive collaboration is needed across business units and functions,” Christoffer Åkesson says.

“Compliance and the fundamentals



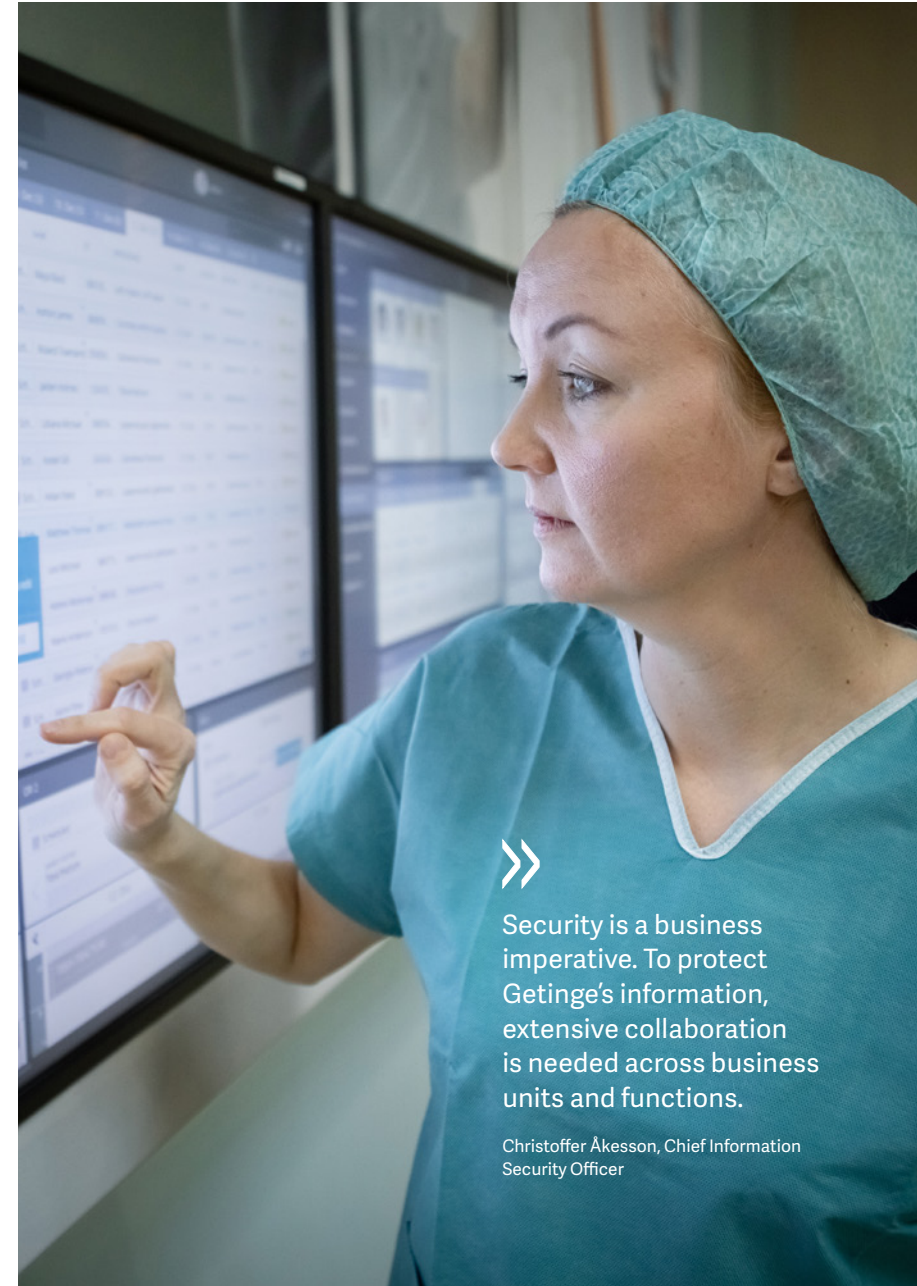
Christoffer Åkesson,
Chief Information
Security Officer



Ludovic Batal, Chief
Information Officer

are as important as ever, but they need to be balanced with emerging threat management. We need to spend wisely on controls and technology to detect modern threats. We must also get governance right – making security a leadership, business and board-level priority,” he adds.

Getinge is currently implementing a new governance model and a new cyber security foundation. In case of data leaks, Getinge has a security incident response plan and privacy breach plans. One of the key success factors of these measures is having a clear governance structure and model, according to Christoffer Åkesson. Information security matters are part of risk committee presentation to the Getinge Board of Directors. In addition, the Group Chief Information Officer Ludovic Batal reports at least annually on information security to Getinge Audit Committee overseeing the information security matters.



Security is a business imperative. To protect Getinge’s information, extensive collaboration is needed across business units and functions.

Christoffer Åkesson, Chief Information Security Officer

Securing products and protecting information

In order to secure that Getinge’s products are safe the company never compromises with security rules.

“We use the most advanced technologies and adhere the strictest regulations when we develop and connect our products. Those rules are implemented thanks to close collaboration between different key Getinge departments, including E&C, R&D, Production, IT and Global Sales,” says Ludovic Batal, Chief Information Officer at Getinge.

“When it comes to securing sensitive information, the best way is to begin by limiting the transport, storage and use of those. Only necessary data should be transited – and not on standard media. This is done with highly secured and encrypted technologies, the storage is then assured by fully GDPR compliant suppliers,” he adds.

Getinge is tracking all type of systems and assets containing sensitive information. These are analyzed with “One Trust” in order to take relevant actions to mitigate identified information security risks.

Information security is also subject to risk based assurance from internal and external auditors.



Challenging Areas

Data Privacy and Digitalization is at the core of our strategy. Connected products and digitalization has the possibility to increase productivity, decrease cost and improve patient outcomes. In this respect it is crucial that we have robust policies and processes in place to secure data privacy and integrity of patient data.

Looking Ahead

We are focusing on “privacy per design” and want to ensure that data privacy is considered already at the R&D stage. We want our customers, and ultimately the patients, to feel safe and secure when our products are used. Our Head of Data Privacy and Digitalization is an integral part of Getinge’s digitalization strategy and work. Getinge is currently preparing to certify Integrated Workflow Solutions and Acute Care Therapy on ISO 27001 information security.

Current Focus

During 2020 company expanded the focus on IT security by appointing a Head of Data Privacy and Digitalization, as part of the Legal, Compliance and Governance team, to lead the global data privacy work closely with Information Security team. The team has been expanded to include Data Privacy officers in key jurisdictions, in addition relevant documents have been updated and information about data privacy matters have been improved. We have also initiated a legal review of all of our connected products. Getinge provides information security training to all employees and has during spring launched an extensive e-learning program.

15

Priority products identified for further legal & data privacy assessment.



We use the most advanced technologies and adhere the strictest regulations when we develop and connect our products.

Ludovic Batal, Chief Information Officer

Interaction with Health Care Professionals

Getinge interacts with hospitals and life science institutions all over the globe. The company has a great responsibility both in terms of patient safety, but also in terms of how public funds are spent in relation to its products and services. Securing integrity and transparency when interacting with health care professionals and health care organizations is a top priority.

Operating with Karolinska University Hospital to Reduce Risks for Patients Undergoing Surgery

Karolinska Anaesthesia Research group for major surgery has been cooperating with Getinge product unit in a transparent way for many years with the aim to develop a new method for advanced monitoring of heart and lungs in anaesthetized patients during surgery. As today's methods are unreliable and/or complicated and increase patient risks, there is a great need for a new, simple and reliable monitoring system.

In Sweden, some 600,000 patients are operated on every year. Meanwhile, the number of elderly and sick people who undergo major surgery increases. Up to 50 per cent of these patients suffer from post-operative complications brought on by imbalances of the circulatory system or lungs. This causes suffering, longer care and increased fatality risk. The problems could be reduced with better control of the blood circulation and lung volume during surgery.

"That's why we, as anaesthesia specialists and researchers in charge of high-risk surgery at Karolinska, became very interested when we were contacted by Getinge about starting a joint project around a new method – the capno method – for heart and lung monitoring. The method is based on measuring the carbon dioxide in the respiratory gases. It's integrated in the ventilator that controls the patient's breathing, which means that it doesn't require any extra equipment," says Dr. Caroline Hällsjö Sander at Karolinska.

In order to be able to use a method on severely ill patients, it must be reliable even if major changes of the patient's condition, such as major haemorrhage or heavy blood pressure fall, occur. This means that initial studies must be performed in animal testing before the method can be tested on patients.

"A basic requirement was to find a way of cooperating that would ensure the independence of our research team and that cooperating with a commercial company wouldn't restrict us from publishing results of our research, even if it would affect the company adversely. But together we have found a way of writing the agreement that makes us feel ethically safe," says Dr. Håkan Björne.

The research team challenged the capno method in clinically relevant testing in several animal tests, in which the new method was compared to gold standard reference methods. The results of these trials turned out really well, which meant that the method could then be tested on patients. Initial

patient trials have confirmed that the method works for measuring both circulation and lungs during surgery.

"The method was developed and tested in our technical lab as far as possible, but the question was how we would be able to assess the practical performance and usability? For this purpose it should be assessed by medical personnel in a clinical setting. Establishing a cooperation with a well-known medical research institute was key," says Magnus Hallbäck.

"Our driving force is to reduce the amount of complications and suffering of patients undergoing surgery and we see that the capno method has the potential to contribute to this. That's why our ambition is to continue to cooperate with Getinge to develop the method until it's integrated in the anaesthesia machines. We also see that it has a potential to monitor the functions of the heart and lungs of patients in intensive care, if it's integrated in the intensive care ventilators," says Dr. Björne and Dr. Hällsjö Sander.



Caroline Hällsjö Sander, MD, PhD, Head of Medical Unit Perioperative Medicine Solna, Karolinska University Hospital



Håkan Björne, MD, PhD, Head of Medical Unit Perioperative Medicine Huddinge, Karolinska University Hospital



Magnus Hallbäck, Research Engineer, Getinge Acute Care Therapies



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Dr. Björne and Dr. Hällsjö Sander

▶ Challenging Areas

Collaboration with doctors, physicians and researchers is key for the development of Getinge's products and services. In addition, public hospitals and purchasing organizations are important customers.

▶ Current Focus

Establishing a new medical affairs function, implementation of a new directive for Interaction with Health Care Professionals and Health Care Organizations including a new tool for transparency reporting. Meanwhile, a directive for interaction with health care professionals and organizations, requiring scrutiny and diligence over related relationships and collaborations, was implemented.

▶ Looking Ahead

Developing standard operating procedures to support day to day activities and decision making, implementation of a new process for grants, extensive training program including e-learning and interactive workshops.



Trade Compliance

Our life saving products are sold globally and in some extent also to sanctioned countries. We do however never compromise with laws and regulations and have implemented processes to secure compliance and integrity when selling to high risk countries.

Special screening processes for sanctioned and risk countries

Getinge conducts business globally, including sanctioned countries which may be in great need of health care products to save human lives. This, however, requires special sanction screening for end-customer/end-user in every transaction before Getinge confirms any sales orders.

Global Trade Compliance Policy requires all Getinge entities that engage in exports directly or indirectly with a country on the List of Risk Countries, and in particular high-risk countries, to implement a so called screening procedure. Before confirming any sales orders, Getinge has therefore implemented sanction screening for end-customer/end-user in every transaction on this list.

Risk countries are those subject to insignificant risk level due to sanctions, as well as countries not subject to sanctions, but associated with risk of circumvention attempts or transshipment. For example, The United Arab Emirates is not itself a sanctions target, but is frequently used by Iran and other sanctions targets to conduct business (for example, an Iranian entity

may form an entity in Dubai as a means of disguising the true beneficiary of a transaction).

“Generally, sanctions are meant to penalize political regimes and, in essence, avoid hurting people. More often than not, health care products are exempted from sanctions and usually are allowed into the sanctioned countries, while observing some rules. We at Getinge feel compelled to help the dis-privileged people of the sanctioned countries, and we do double up on our efforts to meet all the exemption requirements,” says Salah Malek, President Sales Region Middle East & Africa (MEA).

“We have worked tirelessly to understand the global conditions, plan the goods flow, plan the money flow, and screen all the parties involved in the



Salah Malek, President Sales Region Middle East & Africa (MEA).

process. Our passion for life fuels our efforts. The biggest challenge we face is that the sanctions and their rules are dynamic and do change frequently. So we need to remain alert and updated with all alterations to ensure the best adherence to the stringent regulations we put on ourselves to meet all legal and compliance requirements,” he continues.

Getinge is a global company and its products are sold and traded worldwide. Therefore, Getinge is committed to complying with all applicable and relevant laws in the countries in which it operates. Getinge’s products are subject to various countries’ trade laws, including customs, sanctions and export control laws.

▶ Challenging Areas

Trade Sanctions are an area which needs to be constantly monitored. Working with several business partners we also need to secure that we have a good understanding of whole value chains and possible changes both in terms of ownership structures and the sanctions regime.

▶ Current Focus

Continue to implement the business partner risk management process and trade sanctions policy and directive.

▶ Looking Ahead

Getinge will focus on assessing its export compliance program, not only focusing on trade compliance but export compliance topics more broadly.

1,618

Counterparties screened during 2020 and 2021

613

Sanction screening requests completed during 2020 and 2021



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