



# Leading Responsibly

Getinge Ethics & Compliance Report 2022

# Contents

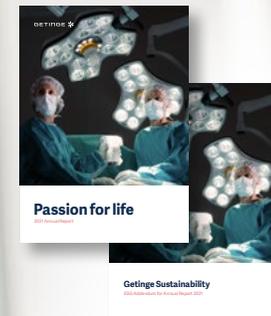
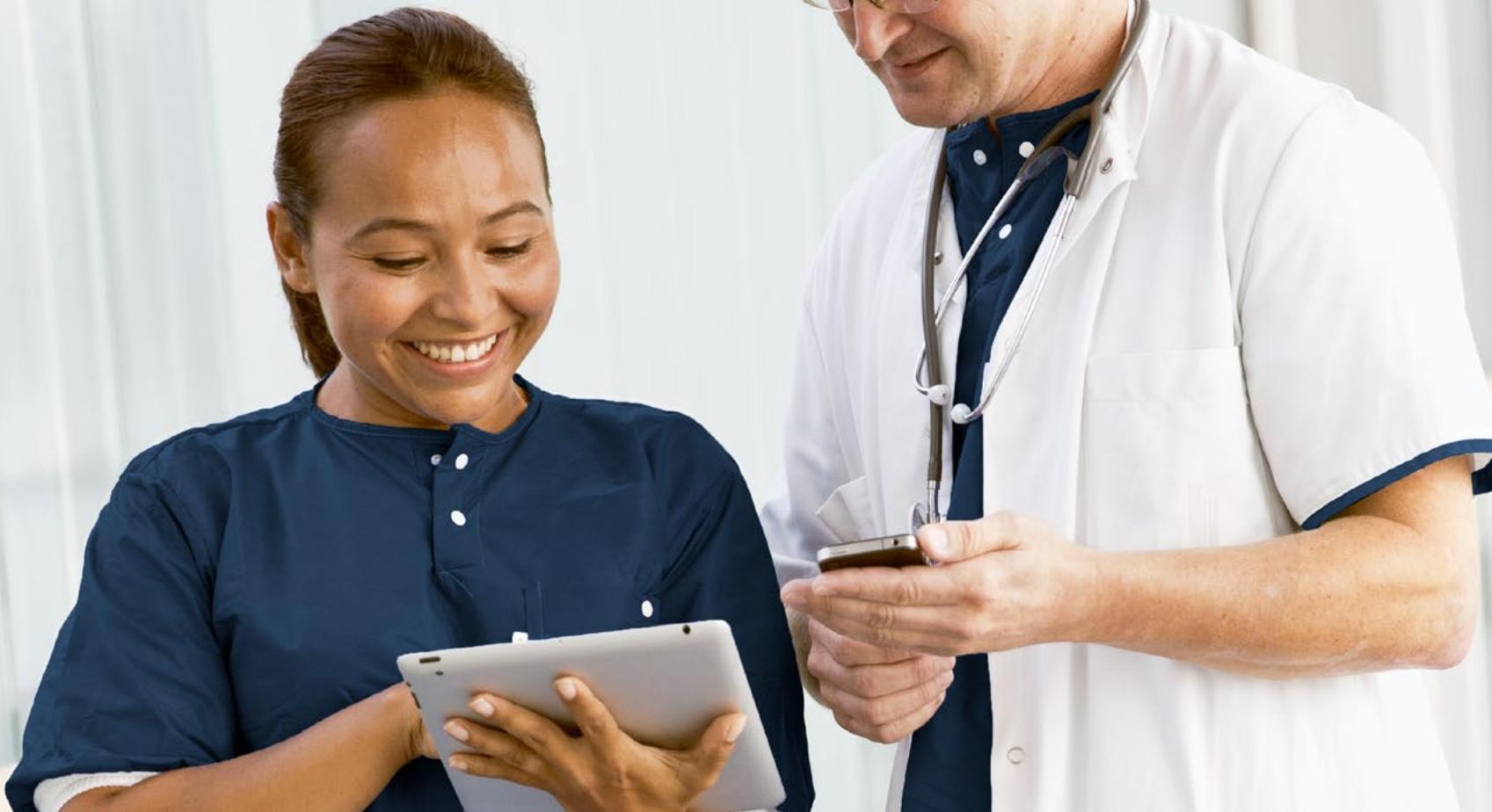
Vision .....	2
Focus areas overview .....	3
Message from the EVP Legal, Compliance & Governance .....	4
Governance model .....	5
Global trends .....	6

The Global team .....	7
MEA and Asia-Pacific .....	9
Central/Northern Europe and CEE .....	10
Southern Europe and Latin America .....	11
North America .....	12
Ethics ambassador program .....	13

Key developments .....	16
Code of conduct .....	18

Responsible Leadership .....	20
Every individual counts .....	21
It starts with me in numbers .....	22

Anti-Bribery Corruption .....	25
Antitrust .....	26
Data Privacy .....	27
Health Care Compliance .....	29
Trade Compliance .....	31



For more information about our sustainability work, governance and GRI Index, see our Annual Report 2021 and our Sustainability Update 2021. For further information regarding Ethics & Compliance issues, please contact [ethics.compliance@getinge.com](mailto:ethics.compliance@getinge.com)

Getinge AB (publ)  
Lindholmspiren 7A  
P.O. Box 8861  
SE-402 72, Gothenburg  
Sweden

Tel: +46 (0)10 335 0000  
E-mail: [info@getinge.com](mailto:info@getinge.com)  
[www.getinge.com](http://www.getinge.com)

## VISION

## Becoming the World's most Trusted and Respected MedTech Company

At Getinge we provide life-saving products and solutions to customers all around the globe. We are obliged to comply with various rules and regulations to ensure that we do business in a responsible and transparent way. The expectations on us are constantly increasing both in terms of regulation, but also in terms of ethical considerations.

We realise that formal compliance programs, such as risk assessments, trainings and controls, will only be effective if influencing and guiding daily decision making. To enable and support all employees in making responsible decisions, taking a stakeholder and long term perspective, we work with what we call Responsible Leadership. This report aims for demonstrating how we aim for integrating ethics and compliance into everything we do, with a specific focus on our Responsible Leadership program.



# Focus Areas

This report focuses on describing Getinge's most material risks and focus areas in relation to Business Ethics and Responsible Leadership as one of our key Sustainability priority areas.



## ANTI-BRIBERY CORRUPTION

page 25

Bribery and corruption is closely linked with distorting competition, defrauding public tender processes and misuse of public funds. Getinge works actively to mitigate the risk for bribery and corruption in all business transactions.

## ANTITRUST

page 26

Respect for public tender processes and fair competition is of utmost importance to secure that public funds are not misused.

## DATA PRIVACY

page 27

Maintaining customer trust in the security of and safety of its products is critical for Getinge.

## HEALTH CARE COMPLIANCE

page 29

Securing integrity and transparency when interacting and cooperating with Health Care Professionals (HCPs) and Health Care Organizations (HCOs) is a top priority.

## TRADE COMPLIANCE

page 31

The area of trade compliance has increased in importance during the year. Complying with trade sanctions and proactive assessments of related risks is a key focus.

## HUMAN RIGHTS

The work to identify and manage risks for human rights violations, throughout the supply and value chain, is being strengthened.

# Why do we talk about Responsible Leadership?

At Getinge every employee and business partner is expected to be a “responsible leader”. Even if I would not be a manager, leading people, I am leading myself and am responsible for the decisions I make each and every day.

The requirements on companies is constantly increasing. Many expectations, in relation to environmental considerations, human rights and social issues, are transitioning from “soft law” to “hard law”. Saying that we comply with the highest ethical standards, with various conventions and commitments, without demonstrating how is no longer accepted. In the wake of increased regulation it is important to ensure that we do not only comply with the letter of the law, but constantly remind ourselves of the ultimate purpose for more stringent regulation. There is not a self-interest in regulatory expectations, which commonly are strengthened in the wake of various corporate scandals and misconduct. Ethical obligations and legal requirements are interconnected, our formal compliance work aim for ensuring that each and every employee is able to make ethical decisions and be a responsible leader.

We realise that no company, nor individual, can be ethical all the time. The

purpose of our ethics and compliance work is to ensure that the decisions we make today are well informed, balanced and can withstand scrutiny also in the future. At Getinge, responsible leadership means being passionate about doing the right thing, daring to raise concerns when something is not right and dealing with issues in a respectful and transparent way. Responsible leadership is all about taking responsibility together and thinking about the consequences from decisions and actions here and now.

During the year we have worked intensively with our Responsible Leadership program. We have created an interactive training portal, with informative GetInspired interviews with world class experts such as Alison Taylor, Ann Tenbrunsel, Fransesca Gino, Guido Palazzon, Mary Gentile and Richard Bistrong to name a few. We have also prepared GetPractical cases, which dive into lessons learned the hard way. Each interview or case conclude with GetPersonal questions,



**At Getinge, responsible leadership means being passionate about doing the right thing, daring to raise concerns when something is not right and dealing with issues in a respectful and transparent way.**

aiming for reflection and discussion in groups. Translations are available to ensure that the program is accessible globally. Our aim is to create a global movement within the company, aiming for increased awareness, reflection and learning. We believe that this will strengthened our capabilities to make the right decisions and build a more responsible company that we all can be proud of working for.

Anna Romberg  
Executive Vice President  
Legal, Compliance & Governance



# The 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.

Legal, Compliance and Governance is a Corporate and Group Support Function at Getinge. The Global Legal, Compliance and Governance team includes the Global Ethics & Compliance (E&C) team, Regional Legal, Compliance & Governance Teams (including regional E&C officers working with the Global E&C team) and Corporate Internal Audit. Within Legal, Compliance and Governance there is also a separate team for data privacy and digitalization.

## Internal Investigations & Monitoring

Getinge has an independent department for internal investigations that reports directly to the head of Global Ethics & Compliance.

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 has the overall responsibility for ensuring that the group Ethics & Compliance programs are adequately designed, global standards, processes and tools are developed 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.

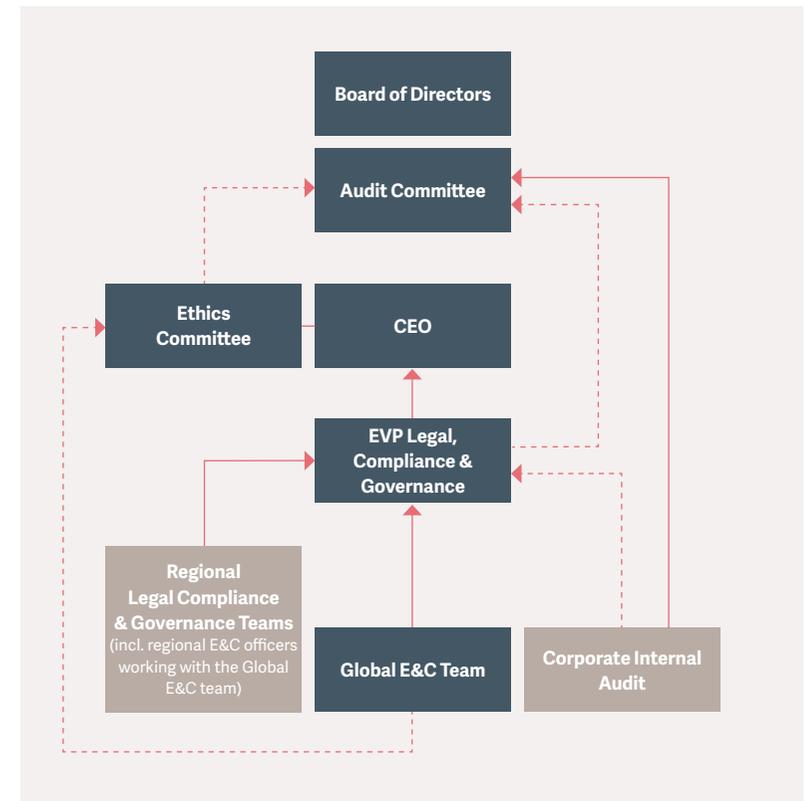
The Global E&C team is managing the internal investigation process. The Head of Internal Investigations is responsible for ensuring that all reports of suspected Code of Conduct violations or non-compliance are properly assessed, investigated and acted upon. The overall governing body

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

Getinge has identified six focus areas based on company risk profile: Antitrust, Anti-Bribery Corruption, Data Privacy, Human Rights, Health Care Compliance and Trade Compliance.

Business Partner risk management is integrated into each focus area as relevant. The operational Ethics and Compliance work is led by the Regional Legal, Compliance & Governance Teams, who has the overall responsibility to provide support to ensure that business activities are conducted according to applicable requirements and to support the implementation

## GOVERNANCE MODEL



of global standards, processes and tools. The Regional Legal, Compliance & Governance Teams reports back to Global E&C on progress of the program implementation on a quarterly basis.

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.

# Global Trends – influencing our Ethics & Compliance work

We constantly monitor evolving regulation, increased stakeholder expectations and trends to ensure our ethics and compliance work is current and risk based. The focus on ESG, geopolitical challenges and changes to how we work are key trends that we have identified during the year.



## 1 ENVIRONMENT, SOCIAL & GOVERNANCE (ESG)

The term ESG has become mainstream. What used to be a term, used by investors to capture non-financial aspects and externalities, is now widely used. Ethics and compliance teams are assessing their role in relation to ESG and external reporting is tailored to fit the categories of E, S and G. E and S seems to be more straightforward to measure and report on, while the definition of G seem to be more vague. At Getinge, we have during the year conducted a more indepth assesment of G, to ensure that we have an adequate understanding of how investors define and assess our Governance relted work.

## 2 GEOPOLITICAL CHALLENGES

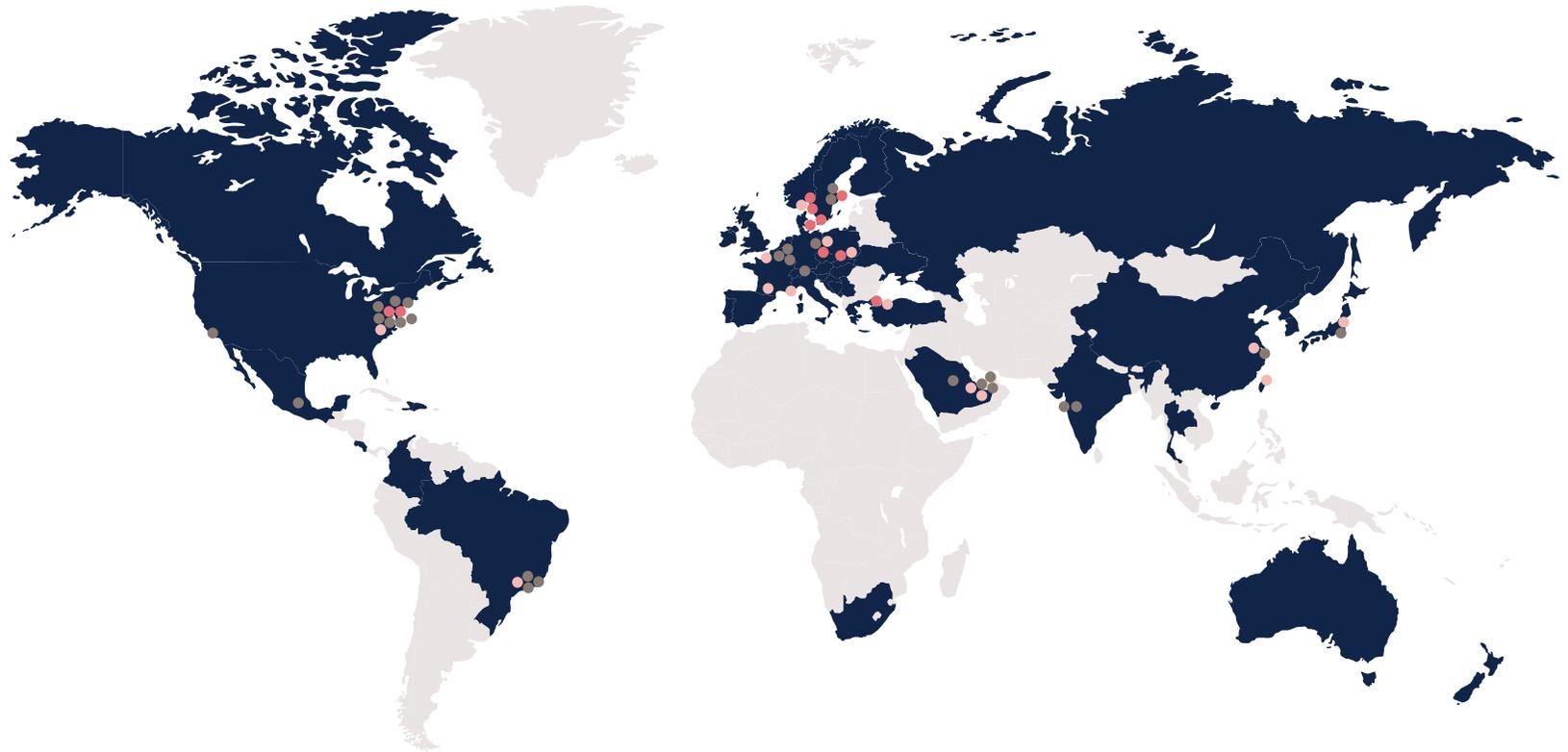
Geopolitical tensions put compliance teams to test. The war in Ukraine has resulted in additional sanctions and even more constrained supply chains, which were already challenged during the pandemic. Companies have to assess their footprint in a new light and the discussion on political risk has resurfaced. Globalisation is no longer a given and ethical dilemmas are a reality. The role of ethics & compliance teams is to ensure that adequate information is in place to make holistic and long term business decisions.

## 3 NEW WAYS OF WORKING

During the pandemic many of us learned to work in new ways. Virutal meetings, offsites and coffee chats became a new reality. In the aftermath of the pandemic office workers are adjusting to new ways of working, some are returning to the office while others continue to work from home or remotely. At Getinge, we have embraced this new reality with a great flexibility for employees. Having colleagues that rarely come in to the office, less travel and less physical oversight introduce new risks and opportunities for ethics & compliance teams. We have to ensure our trainings and processes are fit for purpose and that we innovate in the way we design and implement our programs.

# The Global Ethics & Compliance Team

At Getinge Ethics and Compliance is a shared responsibility, all +10,700 employees are expected to be responsible leaders. The role of the Global E&C team is to support and oversee the implementation of the ethics & compliance programs.



- Global Ethics & Compliance (E&C) Team
  - Regional Legal, Compliance & Governance Team (incl Regional E&C Officers)
  - Getinge Ethics Ambassadors
- Countries where Getinge has own operations.

## 9

The Global Ethics & Compliance team is comprised of 9 full-time professionals responsible for designing, monitoring and constantly improving the E&C Program.

## 22

Dedicated and experienced professionals full-time regional team members responsible for the implementation of our E&C Program in specific regions.

## 43

Ethics Ambassadors (part-time) in 22 countries who support the organization as speaking partners on the ground.

## 16

Countries with dedicated Legal, Compliance & Governance team member

## +10,700

Getinge Employees globally



**Frida Berlin**  
Head of 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.

#### Global Team

**Alexandra Hespeler**  
Global Policy Coordinator

**Alexis Wermuth**  
Head of Health Care Compliance

**Emily Mantovani**  
E&C Program Manager

**Elisa Castrolugo**  
Head of Internal Investigations & Monitoring

**Firuz Achilova**  
Senior E&C Program Manager

**Jonas Elnefur**  
Head of Trade Compliance

**Magdalena Kucypera**  
Head of Business Partner Risk Management

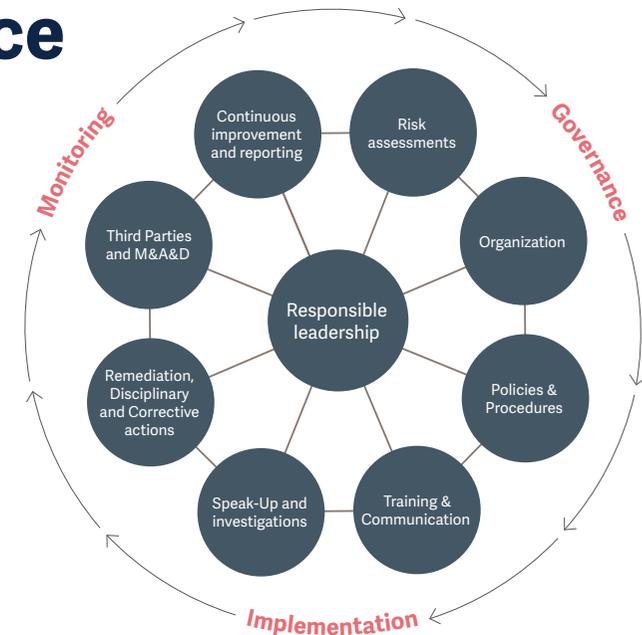
**Heather Holcomb**  
Senior Internal Investigation & Monitoring manager

# Global Ethics & Compliance

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

We have designed and implemented Ethics & Compliance programs for all our Focus Areas: Anti-Bribery & Corruption, Antitrust, Data Privacy, Health Care Compliance, Human Rights and Trade Sanctions. Our E&C programs are designed according to regulatory

guidance, enforcement trends and evolving best practice. The purpose of the formal compliance work is to enable ethical decision making and responsible leadership at all levels in the organisation. We measure both the implementation and impact from our work.



#### Measuring implementation and impact

Getinge is establishing KPI's to both measure what the company is doing and whether it makes a difference

**Share of new business partners that have undergone Due Diligence**  
*Due diligence process mandatory since March 2020*

**85%** → **7.59%**

**Business Partner relationships denied**  
*includes denials as % of DD on new partners since March 2020*

**All employees should receive Business Ethics related training at least once a year**  
*% of employees that have received training in 2022*

**89.8%** → **76%**

**"I feel that my manager clearly communicates the meaning and importance of Responsible Leadership"** Results from Business Ethics Awareness survey 2022

**Speak-up reports recorded per 100 employees**  
*Reports recorded during 2021*

**0.6** → **64%**

**Share of non-anonymous cases of all recorded speak-up reports**  
*based on 2021 reporting statistics*

→ **68%**

**Employees Strongly Agree or Agree that Getinge is creating an environment where employees feel comfortable to speak up**  
*Business Ethics Awareness survey 2022*

## Highlights from the Regions

**Santosh Kumar Singh**

**Head of Legal, Compliance and Governance Eastern Asia, Japan, Middle East and Africa, South-East Asia Pacific**

**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.

**Regional Team**

**Annie Liu**  
E&C Officer Eastern Asia

**Iris Zheng**  
Regional Legal Counsel, Eastern Asia

**Bhavna Arora**  
Regional Legal and E&C Officer SAPAC

**Reemah Dalem**  
Legal and Compliance Officer, Saudi

**Swati Chauhan**  
Regional Legal, E&C Officer, MEA

**Takashi Yoshida**  
Legal & Compliance Counsel, Japan

**Raelyn Kinilitan**  
Ethic, Compliance & Legal Coordinator, MEA EA, SEPAC & Japan

**Harshita Harlalka**  
E&C Officer, India

**Yasmin Sanchawala**  
Legal counsel India

# MEA and Asia-Pacific Region

MEA and Asia-Pacific Region consists of nine passionate experts whose mission is to facilitate excellence and trust throughout our business operations through collaboration and proactive support. Taking another step forward towards becoming the most trusted and respected company in the MedTech industry, a variety of activities have been conducted within and outside of the region with a variety of stakeholders.

**Ethics and Compliance Week**

The Team had celebrated the external E&C Week in April 2022 wherein it was designed to build awareness in ways that reinforce not just specific rules and regulations, but an overall culture of compliance to our external business partners. The event ran for a week and was conducted online. Throughout the entire week, there was active participation and engagement from the Commercial Team, with the Regional Presidents being highly visible from the beginning to the end. A maximum number of interactions between the business partners on topics such as

Interaction with HealthCare Professionals, Anti-Trust, Trade Controls, Anti-Bribery, Conflict of Interest, Monitoring & Audit Right and Speak Up. The event was well attended and participants provided positive feedbacks.

**Business Partner Risk Management**

Getinge's Business Partner Risk Management has been initiated as a means of understanding corporate culture and compliance awareness and practices of our third parties and of strengthening our relationship. The team has visited several distributors and dealers in Thai-

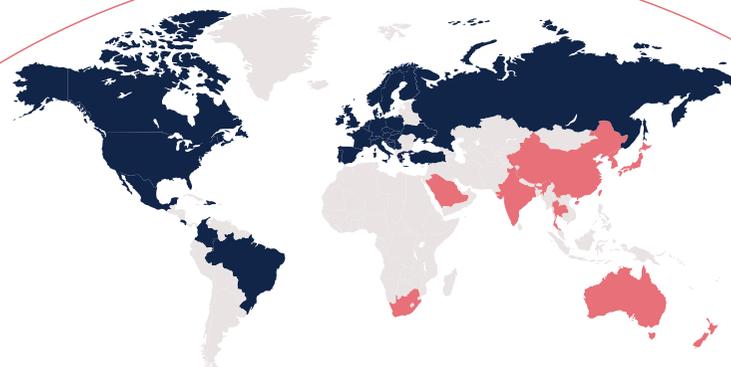
land and Japan. These visits articulates Getinge's commitment to responsible leadership and uphold Getinge's Business Partner Code of Conduct. The plan is to complete the Business Partner Risk Management process in some of the region's countries by the end of this year.

**Enable and Inspire Responsible Leadership**

The region has introduced joint activities to drive strong partnership leveraging on the Ethics Ambassadors. Several sessions was conducted for the management team and sales team, group discussions and emphasis on

the policies/directives are highlighted during these workshops. Monthly communication on various Ethics and Compliance topics has been rolled out to all employees. Moreover, quarterly case studies with different business areas in the region are currently ongoing. Together with the Global E & C Team continuous Responsible Leadership Reflections and Ethics Ambassadors Engagement are the key priorities of the region.

Santosh Kumar Singh  
Regional Head of Legal, Compliance & Governance



## Highlights from the Regions



### Juliana Ugarelli

**Director of Global Legal Projects and Interim Head of LCG Northern Europe and CEE\***

**Location:** São Paulo, Brazil

**Background:** 20+ years of experience in in-house Legal & Compliance practicing, advising global companies in a highly regulated markets and industries, such as healthcare, providing advice and counsel to business leaders with a particular focus in complex contracts negotiations, reorganizations and integrate legal function with the business in reality.

\* Amélie Elias Head of LCG Central/ Northern Europe and CEE currently on maternity leave.

### Regional Team

#### Efe Önde

Head of Legal, E&C, North Europe

#### Alexandra Kuznetsova

Regional Legal, E&C Officer – CEE

#### Andreas Metzner

Legal, E&C, DACH and BeNeLux

#### Myriam Agogue

Directrice Juridique Compliance, France

#### Camille Boucault

Responsable Conformité Anti-Cadeaux et Transparence, France

# Region Central/Northern Europe and CEE

Getinge Legal, Compliance and Governance Team in Northern, Central and Eastern Europe acts as a responsible leadership enabler to support Getinge becoming the most trusted and respected MedTech Company in the World. The region is diverse and complex in many ways, where Getinge has business areas, factories and sales units installed.

The regional team develops and creates a culture of compliance by providing education, training, and daily interaction with Getinge business areas spreading out the global compliance program. Trade compliance and sanctions, healthcare compliance, interaction with HCPs and HCOs, dawn raid and data privacy have been on top of the team's priorities in 2022.

### The War

Meeting the evolving regulatory expectations requires a continuous

improvement mindset and constant updates in such a fast-moving regulatory environment. In this sense, the Russia-Ukraine war requires special attention from the team positioning trade compliance and sanctions on the top of the European Ethics and Compliance priorities.

### Anti-bribery and Corruption

France and the Sapain II legislation directed a risk assessment exercise, placing Getinge in the fight against corruption.

Healthcare Compliance & Innovation Healthcare compliance is heavily present in the research and development projects managed by the Region since Getinge is always in the vanguard of innovative technologies and product development for saving lives using its manufacturing sites present in Europe.

### Ethics Ambassador Program

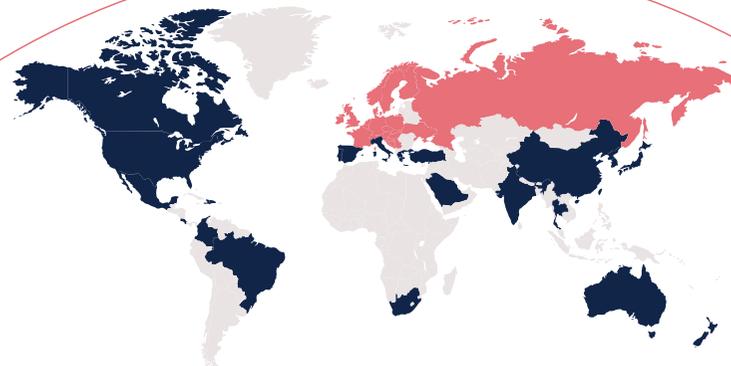
Ethics Ambassador program is well established in Northern and Central Eastern Europe, with representatives adding efforts to Getinge commitment to conduct business with the highest degree of ethics and integrity.

### Future and Beyond

The team will keep working on straightening Getinge global ethics and compliance program across the region integrated with Getinge business areas, encouraging ethical behavior as a driver for sustainable businesses.

Juliana Ugarelli

Interim Regional Head of Legal, Compliance & Governance





### Bruno Ferraz de Camargo

Head of Legal, Compliance and Governance South Europe & Latin America

Location: São Paulo, Brazil

**Background:** Lawyer, Master of Laws (LLM) in International Business Law and European Union Law and post-graduated in Business Administration. Certified Compliance and Ethics Professional – International (CCEP-I) since 2012 with over 25 years of experience in private practice and inhouse counselling in the global legal, ethics & compliance and governance fields.

### Regional Team

#### Alejandra Rodriguez

Legal and E&C Coordinator, Mexico

#### Fabiana Navarro

Legal Brazil & Colombia

#### Babila Gipponi

Head of E&C SE LatAm and Legal SE

#### Danielle Barreto

E&C Coordinator, Brazil

# Region Southern Europe and Latin America

South Europe and Latin America comprise countries that are strategic in terms of growth and opportunities, but at the same time frequently tainted by corruption, governmental turmoil and economic distress. Getinge's Ethics & Compliance team serving these jurisdictions are professionals with robust background and fully capable to advise our company to perform optimally within the legal and ethical boundaries expected.

### Brazil

Training sessions held by E&C team during 2022 focused on clarifying daily questions related to Ethics & Compliance. The team has been establishing a frequent liaison with the Tender Department by providing added value to questions and dilemmas concerning participation in public tenders. Some examples are the antitrust refresh session tailored to answer questions previously sent by business areas; and the presentation made for Agents, Distributors and Sales team on the day before Hospitalar Fair.

On July, taking the opportunity of team meeting in Brazil, a 1,5 hour Town Hall dedicated to E&C were held, on the format of fireside chat with MD and Sales Director.

### Colombia/ SSA

Recent improvements made by Colombian government on regulations related to anti-money

laundering (SAGRILAF) and ethics programs (PTEE) have driven E&C initiatives in Colombia. A local firm was hired to assist with the review of Getinge E&C program and identify the adjustments required to comply with local law.

Training highlight was E&C dialogue during annual SSA Sales Meeting, in February, attended by employees and third parties.

### Mexico/ CAMCAR

E&C team has ran a Risk Assessment in 2021 on Mexico SSU operations, which resulted in a few action plans to mitigate risks identified. As many action plans included training initiatives, four sessions were scheduled to address topics as Responsible Leadership & Speak Up culture; GetBasics

and E&C policies; Conflicts of Interest and E&C program basics and interactions with HCP for Third Parties.

Another initiative linked to 2021 Risk Assessment is a coaching made on weekly meetings between E&C and new Distributor Manager for CAMCAR.

### Iberia – Portugal and Spain

Main E&C project related to E&C in Iberia is the Due Diligence backlog of historical Distributors and Agents. A total of 22 partners are under analysis, with 20 already completed.

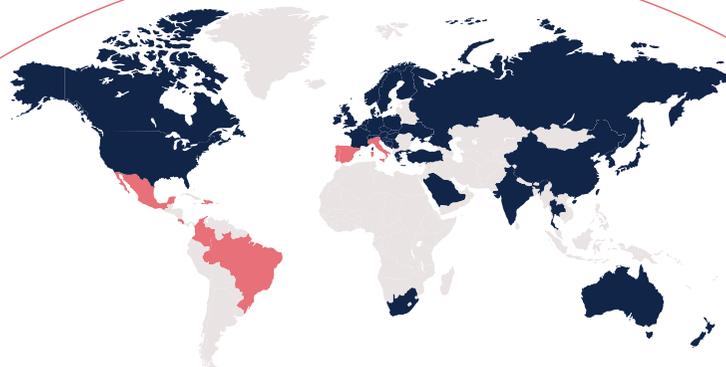
On E&C awareness topic, a customized training about Conflict of interest was presented to Iberia leadership, followed by a manual disclosure of COI forms by employee with potential or actual COIs.

Dawn raids training had been performed as well in local languages for Portugal and Spain, describing again about antitrust and the procedure to welcome authorities in the office during a raid.

### Italy

E&C dialogue on ABC policy, Business Partner Code of Conduct and Interaction with HCPs had been conducted in multiple sessions with local team and all the distributors and agents in Italy in local language (58 partners). The E&C dialogue is a format where the E&C officer discusses with the local MD and management teams about different topics.

Bruno Ferraz de Camargo  
Regional Head of Legal, Compliance & Governance



## Highlights from the Regions

**Adam Falkowitz**

**Head of Legal, Compliance and Governance North America**

**Location:** Wayne, New Jersey, United States

**Background:** Attorney with 15 years of health care and life sciences practice. US health care fraud and abuse, FCPA, and corporate law focus. Prior experience managing US enforcement actions and building international Legal and Compliance functions.

**Regional Team**

**Charlene E. Davis**  
Regional Lead E&C Officer,  
North America

**Kenneth White**  
Compliance Manager

**Natascha Backes**  
Sr. E&C Manager

# Region North America

Getinge is committed to conducting business with the highest degree of ethics and integrity. Getinge's commitment in North America extends to ensuring everyone operates in compliance with all applicable legal and regulatory requirements.

The foundational structure of the North American program begins with Getinge's Global Ethics & Compliance Program and continuously evolves to ensure it is responsive to Getinge's North American business and activities.

**Building the team**

Specifically, efforts in North America have been centered around building the ethics & compliance team and ensuring various program elements exist throughout the region. Strategically, the approach begins with Responsible Leadership and extends

to the development and provision of principles which guide our professional interactions with customers and business partners.

**Focus during the past year**

Over the past year, Getinge has focused its efforts on establishing clear region-specific directives, ensuring training, and developing controls to support North American business activities. Additionally, efforts have focused on underscoring key global initiatives, such as Speaking Up and Responsible Leadership, to aid in the

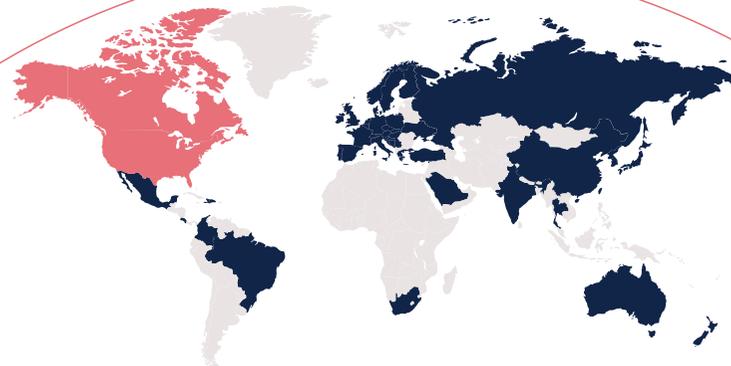
promotion and integration of ethics, compliance, and integrity within the organization. Importantly, in addition to ensuring appropriate interactions with each other, Government officials, and customers, Getinge's aim has been to foster a corporate culture of openness, awareness, and engagement within North America.

The Ethics & Compliance North American program will continue to promote ethical decision-making and develop compliant practices to help ensure successful business.

**Health Care Compliance / Fraud and Abuse regulation specific for the region**

During the year we have continued to develop our ethics & compliance work relating to health care compliance with a specific focus on regional laws and regulation. We have developed local directives, quick reference guides, and various internal processes, e.g., grants, trade shows, etc.

Adam Falkowitz  
Regional Head of Legal, Compliance & Governance



# Ethics Ambassador Program

The program covers all parts of the organization around the globe and the ambassadors play an important role in building a strong culture of business ethics throughout the company.

In November 2021 Getinge launched a global Ethics Ambassador program. The Ethics Ambassador Program is a key initiative under Responsible Leadership #ItStartsWithMe, which aims to have speaking partners on the ground, with the ambition to spread knowledge and support the organization in important business ethics, integrity and compliance matters. "We hope this will trigger even more discussions and conversations around ethical dilemmas, difficult decisions, different opinions and overall Responsible Leadership," says Frida Berlin, Head of Global Ethics & Compliance. The Ambassadors are chosen to cover all parts of the organization and the globe and their main responsibility is to be part of building a strong culture of business ethics throughout the company.

In short, the Getinge Ethics Ambassador should:

- Be a trusted person for discussions, questions or concerns
- Make time for colleagues who approach them
- Refer matters that require expert attention to the Ethics & Compliance department
- Assist, cooperate and liaise with the Ethics & Compliance department to develop, feedback and improve different E&C programs

The first 15 Ethics Ambassadors were appointed in November 2021 – and recently the program was extended with another 28 team members. The program currently consists of 43 ambassadors in 22 countries, covering all parts of the organization and the globe.



## One could for example contact an Ethics Ambassador...

... With questions regarding the Code of Conduct or global policies

... To discuss an ethical dilemma or concern

... To highlight a compliance area in need of more communication and training

... To have a coffee and a chat about Responsible Leadership, Integrity or other related topic

## INTERVIEW WITH ETHICS AMBASSADORS

## We must be an example for our colleagues – but also for our family and loved ones

“Regardless of position, we all have to follow our principles and work continuously on our reputation as a company. It’s impossible to separate who you are personally and who you are professionally – especially when your behavior in private can reflect badly on your professional self and vice versa”.

This is one of the key takeaways from a discussion between Paulo R. Kaufman (Senior Manager Quality Regulatory Compliance) and Aurélio Kalaes Carmona (Managing Director Brazil) on the challenges and rewards of being Ethics Ambassadors and working with Responsible Leadership in Brazil and Latin America.

With a background of 20 years at Getinge in Latin America, Paulo R. Kaufman has played a key role in the company’s transformation journey.

“I would say I’ve worked for many different companies in one over time. Today, Getinge is a truly integrated company. Integration is a key success factor for us, cooperation rather than isolation has been an important part of responsible leadership”, he comments.

“The Responsible Leadership program is all about connecting with our values and bringing them to work. We have to be an example to our colleagues, but we also have to be an example for our children, we are one and the same in our professional and private lives”, Paulo R. Kaufman continues.

Following allegations of misconduct in Brazil in 2017, Getinge has worked extensively both internally and with regulators to ensure that this type of incident will not be repeated. Aurélio Kalaes Carmona started to work for the company right after the allegations had been made.

“It was a defining moment for Getinge, and a nightmare at the same time. I’m very proud of what has been done since then, creating a safe envi-

ronment and trust among suppliers, customers, shareholders, and most importantly our employees”, he says, continuing: “We may have been unmotivated then, now we are full of energy. Our journey was made possible by the full support from HQ and the global team. And now we are in a good place where we’ve signed our agreement with the authorities – our team works together, acts together, and reacts together”.

Paulo R. Kaufman adds that as Ethics Ambassadors they must lead by example.

“We are not perfect, we will not always do the right things, but we have to correct our mistakes and make sure we don’t repeat them. It’s a constant self-reflection process. It’s a continu-



Paulo R. Kaufman, Senior Manager Quality Regulatory Compliance



Aurélio Kalaes Carmona, Managing Director Brazil

ous journey that will surely be reflected in our bottom line”, he says.

Discussing the current situation in the world, and in Brazil, they both call it “an interesting year”.

“It’s been a particular market situation with crazy logistics, a war etc. But we carry on with high performance, and always with a smile. It’s not an obligation to work here, it’s a choice, and I personally want to work here for the rest of my life”, says Aurélio Kalaes Carmona.

## INTERVIEW WITH ETHICS AMBASSADORS

## We put Responsible Leadership in the spotlight wherever we can

Before joining Getinge, both Lizelle Oosthuysen and Issam Maraghy witnessed events in their professional lives that were contrary to their concepts of workplace ethics. Today, as Ethics Ambassadors, they are both deeply engaged in ensuring that ethics and compliance issues are constantly discussed among colleagues to prevent misconduct.

Lizelle Oosthuysen recently moved from South Africa to Dubai, where she is responsible for developing therapy, especially in the cardiovascular portfolio. The day that she was chosen to be an Ethics Ambassador, she was very excited, she recalls.

"I was a perfusionist and I worked in the field for many years in hospitals and intensive care units. Back then, interactions with the industry were probably not as controlled as they are today. A lot was about selecting the provider that gave you the most, and this was right through my throat all the time. I want to give the absolute best treatment to my patient, and it was very hard for me to witness this widespread bribery. I made a lot of enemies because I wanted no part in this", Lizelle Oosthuysen says.

"I realize my current colleagues may not have the first-hand experience that

I have, and I am very happy that E&C is bringing this to our attention, and that we can contribute to this focus through the Ambassador Program", she continues.

Issam Maraghy, however, shares her first-hand experiences of witnessing questionable conduct. Originally from Egypt, he practiced medicine in the country for ten years before joining the company in 2012. He started on the clinical application side with cardiovascular and cardio surgery. Overtime, he got involved in marketing and is now in charge of Business Development for the region Middle East and Africa.

"I felt very privileged to be chosen as one of the first Ethics Ambassadors. I was very interested, because I, too, come from the medical practitioner side, and I've seen a lot of things that have given me food for thought", he says.

"When I was 25 years old, I was teaching medicine at a private institution in Cairo and participated in interviews of job candidates. There was one woman who nailed all the questions, and I thought that she was perfect for the role. Once interviews were done, my superior said that he would not hire her because of her religion – in Egypt, your religion is written in your ID. This caused me a very difficult internal struggle, because it clearly wasn't right, but I didn't know what to do as I was very junior and on probation. Now, I understand that I could have done things differently, I should have done things differently", he says.

According to Issam Maraghy, the Responsible Leadership program provides great tools to analyze circumstances and make decisions accordingly.

"It's really been an eye-opener", he says.



Lizelle Oosthuysen, Therapy Development Manager, Cardiovascular, Middle East and Africa



Issam Maraghy, Director Business Development, Acute Care Therapies, Middle East and Africa

Apart from understanding the risks for the company, sales people also need to be more creative and work a lot harder on the big impact moment, rather than just putting an envelope into someone's hands, Lizelle Oosthuysen points out.

"The Ethics Ambassador program is spot on, and as Ambassadors on the ground, we get to work with this continuously, engaging in different levels. For example, around the coffee machine, we're having a lot of meaningful discussions, that's where we make an impact", she says.

As Ambassadors, Lizelle Oosthuysen and Issam Maraghy send topical e-mails to their regional colleagues once a month, do quarterly case studies from the Responsible Leadership program, and participate in bigger regional meetings for topical deep-dives.

"We put Responsible Leadership in the spotlight wherever we can, especially with regards to interactions with Healthcare Professionals, and we are also spreading the gospel to our customers, letting them know that things are changing and how we do business. We're very happy to see that our colleagues have an ever-growing level of awareness. They may not have all the answers, but they are asking the questions", they say.

# Key developments

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

## Risk Assessments

During 2022 Getinge has initiated risk assessments in Colombia, South Africa, Thailand, Taiwan and China. The company has also developed a formal protocol for conducting the risk assessments, using a risk-based approach, and use forensic expertise when assessed relevant. The Regional LCG teams conduct the risk assessments locally, specifically focusing on corruption, antitrust, trade and export controls related risks, and develops mitigation plans towards reducing the most significant risks.

Lessons Learned from Risk Assessments are incorporated in the E&C Program Plan as well as in global training

initiatives. During 2022, Getinge has initiated a project to further enhance the risk assessment methodology and this will be rolled out in 2023.

A joint root cause analysis has been conducted in collaboration with Corporate Internal Audit. The analysis aims for identifying structural issues, which may lead to an increased compliance risk. The root cause analysis has been discussed in the executive team and Audit & Risk Committee of the Board.

## Policies & Procedures

Getinge's Global Policy framework consists of 14 global policies and related directives and instructions. During the past year, the Global

Policies have been reviewed and the following policies have been updated: the Global Trade Compliance Policy, Financial Policy, Insider Policy, Corporate Governance Policy, Anti-Bribery and Anti-Corruption Policy. The Global Policies have been translated into twelve languages and are easily accessible to all employees on the new GetBasics page on the Getinge Intranet, as well as publically available on Getinge's website. Each legal entity is responsible for formally adopting the Code of Conduct and Global Policies including related Global Directives.

Check out Getinge's Global Policies on [www.getinge.com/code-of-conduct/policy-summaries/](http://www.getinge.com/code-of-conduct/policy-summaries/)



## GetBasics

At Getinge everyone is responsible for creating a workplace where rules are followed, responsibility for actions are taken and to work effectively together. In November 2021, Getinge launched its new GetBasics Platform. The GetBasics platform provides an overview of the basic framework for how to work at Getinge and easy access to globally applicable business steering documents. In GetBasics employees will find information about:

How to operate	Which requirements guide the daily work	How to act responsibly
<ul style="list-style-type: none"> <li>The operating model</li> <li>The three Business Areas</li> <li>The different Support Functions</li> </ul>	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Global Policy Framework, with 14 global policies</li> <li>Requirements per function</li> </ul>	<ul style="list-style-type: none"> <li>Decision-making</li> <li>Responsible Leadership</li> <li>Speak-up</li> </ul>

Since the launch, **55** new or revised documents have been published and visits have exceeded **130,000**, which means **>12,000** visits per month.

Total number of sites assessed annually for risks related to corruption



## Program Highlights

**Training & Communication**

Training and internal communications are important parts of Getinge's work with Ethics & Compliance. The global compliance training program includes targeted training for specific groups at all levels of the company including employees, the Board of Directors and all members of the Executive Management Team. All new Getinge employees receive initial communication of Code of Conduct and all other relevant policies, including anti-corruption policy, during employee onboarding process. The Ethics & Compliance training is done on a regular basis and during the year training on topics such as Lessons Learned, Dawn Raid, HCP Interactions, Anti-Trust, Anti-Bribery & Corruption, Data Privacy and Money laundering has been held. During 2021, 8274 employees have been trained in virtual face-to-face trainings.

In December 2021, as a part of the communication activities on International Anti-Corruption Day recognition, a new Global Anti-Bribery & Corruption e-learning was rolled out to all employees globally. 89.8% employees have completed the e-learning program. In addition to the dedicated Anti-Bribery Corruption E-learning, Getinge's Anti-Bribery and Corruption policy is communicated to the business partners, during contracting and onboarding process and is a mandatory part of the contract templates. In Q2 2022, a specialized e-learning training module for distributors and agents was rolled out and to this date 187 distributors and agents have completed the training.

During the past year one of Getinge's main activities was to increase knowledge and awareness among employees in the area of Health Care Compliance. In July 2022, the 'Interactions with Health Care Professionals and Health

Care Organizations' E-learning was rolled out to all employees globally. This training is an interactive, scenario-based training with modules that illustrate the rules we need to follow in our customer contacts and other interactions with HCPs and HCOs. The training covers everything from location and venue of meetings to educational grants and donations and is based on the seven core principles of Integrity, Benefit, Transparency, Proportionality, Documentation, Image & Perception and Separation. So far, 7,733 (83%) employees have completed the Health Care Compliance e-learning program.

Antitrust & Fair Competition continues to be another key focus area. Our Global Commercial Management Development program (CMD) includes a dedicated Antitrust and Fair Competition workshop. During 2021, 40+ senior leaders from commercial management and global functions participated in the Antitrust and Fair Competition

training. The program will continue during Q3 2022. In addition to the CMD program we have also have conducted virtual face-to face Dawn Raid training in most regions.

Since 2019 Ethics & Compliance has been included as an integral component of all Getinge's Leadership Programs. During 2021/2022, 223 managers from different parts of the company have participated in the face-to-face training on Responsible Leadership focusing on trust and integrity as part of the Leading People and Leading Leaders Programs.

Getinge's compliance training are regularly evaluated by asking employees to complete short post-training surveys. This gives valuable insights and feedback to evaluate and make improvements to the Ethics and Compliance training programs. We are further developing the approach for measuring training effectiveness.

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

**89,8%**  
2022

**87%**  
2021

**85,3%**  
2020

**100%**

of participants in the Commercial Management Development (CMD) program strongly agree they have a better understanding of Getinge's commitment to fair competition and how to manage business relations according to the global policy and directives related to antitrust.

**83%**

employees have completed the Health Care Compliance e-learning program.

**1,035**

agents and distributors have received face-to-face virtual trainings during 2021 in SAPAC, Latin America and North America regions.

## Program Highlights

## Responsible Leadership – Getinge's Code of Conduct

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.



## 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 2021, 74 reports were recorded and investigated by the Internal Investigations team. 44 reports were received through Getinge's Speak-Up Line, and 30 reports through other channels. The most common reported concerns relates to Business Ethics and People matters. After thorough investigations, including interviews, document reviews and an objective assessment of facts, disciplinary actions were taken in six cases.

The Getinge Speak Up Line is available in 11 languages and open for Getinge employees as well as for suppliers, distributors and other

business partners and can be found on the Getinge Intranet as well as on the Getinge website. Getinge has strict policy for non-retaliation and provide training to managers on internal investigation process, lessons learned and retaliation.

## Continuous Improvement & Reporting

For the third year in a row, Getinge measure the organization's perception of how well the company lives up to its values of Business Ethics & Responsible Leadership. A total of 5.909 employees from all over the world voluntarily participated in the 2022 Business Ethics Awareness Survey. A majority of the respondents, 76%, felt that managers within Getinge clearly communicate the meaning and importance of responsible leadership.

Access Getinge's Speak Up Line <http://www.getinge.ethicspoint.com/>

# 11

Speak Up Line is open for internal and external parties and available in 11 languages

# 74

Reports of suspected misconduct were reported and investigated by the internal investigations team in 2021

# 90%

Of employees who participated in the 2022 Business Ethics Awareness Survey are aware how to report ethical concerns or misconduct, up from 87% last year.

# 5,909

Employees from all around the world participated in the Business Ethics Survey in 2022

# 76%

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

## Program Highlights

### 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, 427 new and 1,179 existing third parties have been screened, of which 94 third parties were denied.

During the year we have worked with improving our M&A process even further, including pre-closing due diligence procedures. We are also streamlining our approach for post-closing compliance work.



## 427

New business partners have been screened, whereof 29 were denied.

## 1,179

Existing business partners have been screened, whereof 65 were denied

## 1,242

Business partner employees trained in interactive face to face or virtual trainings during 2021 and 2022

# Responsible Leadership #ItStartsWithMe



We can never take integrity and a responsible culture for granted. That's why we are deeply committed to proactively working to make responsible leadership an integral part of our culture going forward.

Mattias Perjos, CEO, Getinge



Becoming the most trusted. Listen to Mattias Perjos, CEO, Getinge  
<https://www.getinge.com/int/company/business-ethics/#block-92320>

# Every individual counts – and every decision matters

The Responsible Leadership #ItStartsWithMe program aims to encourage employees to feel that they can contribute to a better world through their decisions, their authenticity, and their work in a company where every individual counts, and every decision matters.

The program has been created to inspire all employees to become aware, make better decisions and make a positive impact. Through taking part of inspiring videos and in practical workshops, employees will grow in leadership and get vital tools to contribute to a better self, better company and a better world.

The Responsible Leadership #ItStartsWithMe journey consists of three parts; Understanding, Reflecting and Acting. The program includes more than 50 short videos, (**GetInspired**), with some of the world's foremost experts on behavioral science, corporate culture, business, and leadership. These are combined with case studies, (**GetPractical**),

from Getinge's business environment. Each part ends with a live workshop (**GetPersonal**).

The first part, **GetInspired**, is focused on knowledge and inspiration regarding human behavior and human interactions. Participants get an insight into concepts including ethical blindness, rationalization, giving voice to values and why we don't speak up.

In the second part, **GetPractical**, the notion that it's not enough to understand concepts on an intellectual level is introduced; we also need to practice our "ethical muscle". This part is made up of cases in which employees discuss and practice different reasoning, problem statements and dilemmas.

The third part of the program is a set of three **GetPersonal** workshops, where employees from different parts of the organization interact to apply their learnings and the concepts of the program on real-life cases, using the tools they have been equipped with to create change.

The Responsible Leadership journey, however, does not end with the content and workshops of this program - it is only the beginning. The ambition is to build a company that is part of the solution to the world's problems.

The program is voluntary and open to all employees.

## GetInspired

## GetPractical

## GetPersonal

To learn more about Responsible Leadership at Getinge, see:  
<https://www.getinge.com/int/company/business-ethics/#block-92320>

## INTERVIEW

## Together – taking our responsibility

The formal Ethics & Compliance framework is essential to uphold ethical practices in the company. But according to Michaela Ahlberg, creator of the Responsible Leadership #ItStartsWithMe program, a key component must be added; i.e. responsible leadership. “We need to reach the leadership of the company. And by leadership, we do not mean managers, we mean all employees”, she says.

According to Michaela Ahlberg, people generally over-estimate the significance of specific knowledge in topics such as bribery and corruption or privacy legislation; thinking that this is the most important factor in sound decision-making. “Perhaps we’ve also thought that if we worked hard enough on the formal components of our framework, Responsible Leadership would manifest as a logical consequence. This is not the case”, she says.

“We’ve been asking ourselves how to really test the effectiveness of an Ethics & Compliance program. In order to do this, we need to establish what results it is we are aiming for. What is our purpose, our raison d’être? To follow the law? Or to create a culture where doing the right thing is a main pillar?”.

### Formal framework not enough

The formal framework is critical, but it will not stand alone, a key component has to be added – i.e. responsible leadership, Michaela Ahlberg says.

“We need to reach the leadership of the company. And by leadership, we do not mean managers, we mean all employees. The real purpose of the formal framework is to generate information, create friction and discomfort, and thereby enable more enlightened – and better - decisions. The outcome of a risk assessment, for example, is bound to cause discomfort. Information that we may not have thought of before, is suddenly placed in front of us”.

“Investigations are good example; talk about causing discomfort! Suddenly you may have to realize that there is misconduct and maybe even criminal activity in your organization, and it may also involve people you know and key areas of the business”.



Michaela Ahlberg, Senior Advisor and creator of the Responsible Leadership #ItStartsWithMe program

### “Return power to the business”

Some people think that Ethics & Compliance is a control department. But nobody will ever control 11,000 employees. Nor is it possible to control way to a desired behavior. The only way is to enable, inspire and support, so that individuals themselves become aware of how they wish to behave.

“If we accept that this is our role, and that control does not work, we must let go of the control. We are here to support, raise awareness and knowledge, to inspire. We are not here to police, make decisions, or to be oracles of ethics. When I started at Getinge as Head of Ethics & Compliance, I said that I will not make any decisions here. It’s about returning the power where it belongs, to the business”, Michaela Ahlberg says.

### #ItStartsWithMe – in numbers

**26** hours of training if you take the **full program**

**18** hours of **GetInspired & GetPractical**

**8** hours of virtual **GetPersonal** workshops

**12** hours of **GetPractical** case studies from Getinge’s business environment

Since February 2022  
**773** colleagues have signed up for the voluntary workshops

**14,092** videos watched

Active engagement on the site with **over 1,216** comments

**2,361** unique users on the site

### Passiveness enables misconduct

“Corporate misconduct wouldn’t be possible if it weren’t for people like you and me. In hindsight, we typically focus on the “bad apples”, which is also very important, but it’s even more important to reflect on those who enabled the actions in question, the good people, who, by not speaking up, by staying passive, or in other ways participate in the misconduct. Disciplinary actions against so-called bad apples are mandatory to be clear about what is accepted. But we should be humble and accept the possibility that it could have been us under certain circumstances”, Michaela Ahlberg says.

“We have collaborated with experts on human behavior who have helped us to understand that we are not the rational fact-driven decision-making machines that we think, we are in fact conditioned by many other factors that guide our intuition and our behavior. Responsible Leadership #ItStartsWithMe is a program where the individual participant gets to explore human behavior, and concepts like ethical blindness, rationalization, and ethical fading in order to better understand their own behavior, as well as that of others”, she continues.

### Based on interviews

Michaela Ahlberg says that she found inspiration for the Responsible Leadership #ItStartsWithMe program through listening to different types of lectures and podcasts with people that inspire her.

“And I thought, if I am inspired by this, maybe other people will be too. So we picked and interviewed 18 thought leaders from the private sector and academia, former World Bank directors and others on human behavior, leadership and business - all in the spirit of promoting our company’s vision; i.e. becoming the world’s most trusted and respected medtech company”, she says.

The result was 63 15-minute podcasts in video format, and a series of animated case studies, with the addition of three live and interactive workshops.

### Positive feedback

The program was launched in February 2022 and the feedback so far has been overwhelmingly positive, according to Michaela Ahlberg.

“My ambition is to do a cultural assessment in a year or so to measure real impact. But we have already seen

that parts of the organization have taken the program to their hearts and developed it further, incorporating it into their management and leadership. Our key success indicator is the work of the Global Sales Management team where Carsten Blecker and Ahmet Eke dedicate half an hour every hour week to Responsible Leadership sessions with hundreds of participants. This, in itself, is the goal of Responsible Leadership, of Ethics & Compliance, when people out in the organization work with these matters themselves”.

“I think it’s taken a lot of knowledge and insight to start this type of program. I would not have been able to do it myself 20, 15, or even 10 years ago. And more importantly, not a lot of companies would have invested in such a program. This is a sign of Mattias Perjos’s faith in Ethics & Compliance. It’s a leadership style that fosters trust and respect” Michaela Ahlberg says.



Get Inspired

Welcome to this journey! watch the video to learn more.  
<https://www.getinge.com/int/company/business-ethics/#block-92320>



In the beginning we said, it would be nice if people started to take a more active interest in sustainability concerns, in how you, how I can make a change. But now I think I have taken this a step further because the program is structured in such a way that it gives people an opportunity to think about who they are, what values they have and what values they want to bring to work. How to bring their best selves to work, how to make better decisions, how to be a better worker at Getinge.

Michaela Ahlberg, Senior Advisor and creator of the Responsible Leadership #ItStartsWithMe program

## INTERVIEW

## The program triggers awareness of important ethical issues

“Ultimately, we want everyone in our team, and their teams, to complete the program and become certified Responsible Leaders. We cannot expect people to give importance to something if their leaders don’t,” says Carsten Blecker, Chief Commercial Officer, in this discussion on the Responsible Leadership program with Ahmet Eke, Getinge’s very first Ethics Ambassador.

According to Carsten Blecker the Responsible Leadership program is “a world apart from the typical “yet-another-textbook-trainings”.

“I did the program as soon as it was available and I got hooked, in the same way that you get hooked on a Netflix series, I couldn’t stop watching. Because Ahmet is an Ambassador, he had already completed the program before it was officially launched and he was sharing teasers with the team”,

“In the Global Sales team, we quickly established a systematic approach to the program. When our management team meets every other week, one of us leads a Responsible Leadership session, picking a video and a theme, such as courage, diversity or Speak Up and moderate a discussion. At first, it was only the Global Sales Management Team, but we quickly extended the invitation to others so many of our sessions have had 90 attendees. We

make the sessions as interactive and interesting as possible, and people are very engaged”, Carsten Blecker says.

“Ultimately, we want everyone in our team and their teams to complete the program and be certified Responsible Leaders because we have to lead by example. We’re surprised sometimes at how much people mirror their leaders”, he continues.

Before the Responsible Leadership program was launched, Ahmet Eke, President of Getinge Central and Eastern Europe, was doing Ethics and Compliance sessions with Global Sales Management Team members in an interview format.

“At each of the sessions, we took up a different and important E&C topic. We sent the messages bi-weekly to keep focus on these important issues. Although it was a simpler version of the Responsible Leadership program, it worked well at the time. But now, I am really happy that we have the RL

program in place, as it’s very structured and contains much richer content with nice videos and to the point messages”, he says.

Ahmet Eke points out that the sessions are an important triggering point to increase awareness.

“But of course, it doesn’t stop there. We also have complementary sessions with the team; the most recent one was Speak Up and Listen Up on how to create a Speak Up environment and how to receive feedback. We need to cascade these messages to our organizations in order to increase the awareness on a broader level”.

“We also spend a lot of time and effort on educating our business partners in meetings where we do the trainings, including sharing case examples from the Responsible Leadership program, when appropriate. We are always looking to do more, Ahmet Eke says.



Carsten Blecker, Chief Commercial Officer



Ahmet Eke, President Getinge Central and Eastern Europe and Ethics Ambassador

Usually a training helps you to be a better professional. The Responsible Leadership journey will help you to be a better human being.

HR Manager, France

I learned to be more courageous, to speak up more and in the right way.

Clinical Specialist, South Africa

Responsible Leadership is not only for managers. It is for you and me.

Business Development, Dubai

Responsible Leadership is an eye-opening experience for anyone interested in having a broader understanding on how to become a more ethical and inclusive leader and person.

Managing Director, The Netherlands



# Anti-Bribery Corruption

As a global medical technology company Getinge provides equipment and systems within health care and life sciences to public and private customers in 132 countries. The company takes part in public tenders and collaborate with business partners such as distributors and integrators. It is of utmost importance to manage the risk for bribery and corruption in all business transactions.

## Challenging Areas

Getinge needs to ensure that its wide network of business partners comply with the same standards as internal employees. The company also wants to find long term partners to work with that are committed to the same standards.

## Current focus

In 2022, work has continued to strengthening Getinge's third party risk management processes by further improving the methodology as well as using more sophisticated tools, enabling further automation and gaining efficiencies.

Significant efforts have been put on raising awareness and training of Getinge's business partners, such as agents and distributors, on business ethics standards, especially in the high risk regions. Following anti-corruption global trends and internal risk assessment activities, the company regularly review its polices to address emerging corruption risks and standards. During 2022 the ABC policy and some relevant directives was updated, as well as Business Partner Code of Conduct, and has continued constantly promoting policy requirements and standards, internally among employees and externally to

its business partners, via tailored e-learning courses, communication events and materials. Furthermore Getinge has reconsidered its ABC risk assessment process for better resource allocation and informed decision-making process.

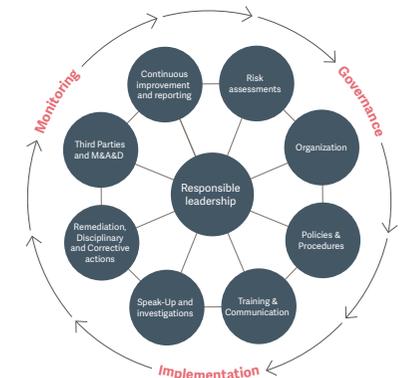
## Looking Ahead

Going forward, focus will be to further strengthening the risk assessment processes, program implementation and proactive monitoring practices, including implementation of new tools and processes for ongoing monitoring and mitigation of bribery and corruption risks.



The Swedish Anti-corruption Institute's mission is to promote ethical decision processes within business as well as within the rest of the community and to prevent the use of bribes and other types of corruption as a means for affecting decision processes. Getinge is a supporting member since 2022.

Read more in the Global Anti-Bribery & Corruption Policy  
<https://www.getinge.com/int/company/business-ethics/policy-summaries/>





# Anti-trust

Getinge conducts operations in 40 countries and supplies products and services in a total of 132 countries through own companies and distributors. The company has learned the hard way how important it is to secure fair competition and ensure that hospitals, and taxpayers do not suffer from unfair competition.

## Challenging Areas

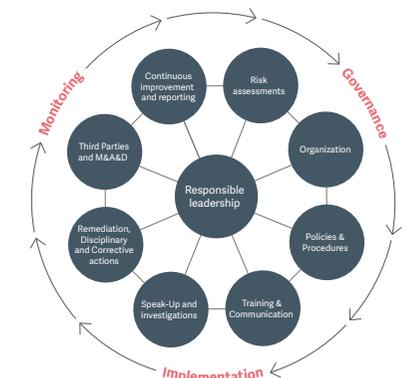
Working with a wide network of business partners, Getinge must maintain high standards and ensure that competition is fair. Many of the customers finance their purchases of Getinge's products and services with tax money and through the fiscal budget, either directly or indirectly. Key risks include overall day-to-day conducts in public tenders, illegal coordination with distributors and abuse of market dominance

## Current focus

Getinge has continued its focus on strengthening its global anti-trust program. Significant efforts have been put on activities to increase knowledge among employees in the area of Antitrust & Fair Competition included tailored training courses on Antitrust and Fair Competition which have been rolled out in all of the company's sales regions. At the beginning of 2021, the Antitrust and Fair Competition e-learning "Win Fair" was rolled out to all non-production-related personnel globally. 8,401 employees completed the training during 2021, which constitutes 90,6% of the target audience.

## Looking Ahead

Work will continue next year to strengthening the E&C methodology for M&A&D including Antitrust and to apply corrective measure from risk assessments and investigations. Getinge will also continue its focus on training and awareness throughout the organization.



Read more in the Global Antitrust & Fair Competition Policy  
<https://www.getinge.com/int/company/business-ethics/policy-summaries/>



# Data Privacy

Properly managing and controlling data privacy and cybersecurity risks has become a core essential in the digital health and medical device space. Getinge has taken steps in the past year to ensure that privacy and cybersecurity principles are continuously and proactively embedded in its business processes.

## Challenging Areas

Challenges include developing a dynamic privacy program at a speed that keeps pace with rapidly evolving data privacy and cybersecurity laws and regulations as well as with opportunities for innovation and business development.

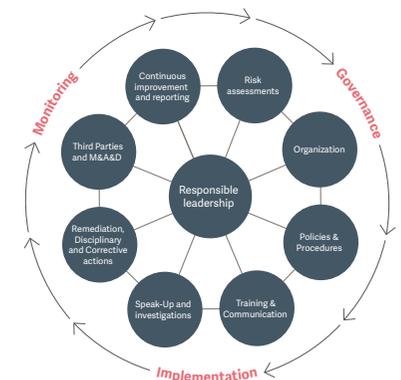
## Current focus

Getinge's current focus is on building better and more uniform documentation and processes across the enterprise – such as those relating to cross-border data transfers – meeting

legal and business requirements in key markets. Regional legal and compliance support for local data privacy regulation has been established in each region in which Getinge operates. This enables us to distribute trainings on our data privacy program with local law context incorporated and ensures a uniform approach to data privacy principles, documentation and processes. Getinge has also launched a major patient-related data protection initiative in the US, demonstrating our ability to meet data privacy and security requirements on a global scale.

## Looking Ahead

In the next year, Getinge will continue looking at its data collection and processing practices, including the use of data in research and development, i.e., product development to product deployment. The goal is strengthening the core underpinnings of Getinge's data privacy program. All initiatives will be closely aligned with cybersecurity and infosec requirements – as well as meeting the varied needs of the global operations.



Read more in the Global Data Privacy  
<https://www.getinge.com/int/company/business-ethics/policy-summaries/>

## INTERVIEW

## We have become more efficient at addressing data privacy

Local data privacy laws and regulations are rapidly developing in most markets and jurisdictions, and as a global company we must ensure that our data privacy program keeps up to speed with those developments - while also meeting the needs of the innovation and business development opportunities within Getinge.

Digital Law encompasses a wide range of legal areas and challenges of which one is data privacy. Properly managing and controlling data privacy is a core essential in the digital health and medical device space and software tools, patient treatment devices, and technology solutions must meet applicable laws and standards. With cyber attacks becoming more frequent and more disruptive, it is important to ensure that software tools, patient treatment devices, and technology solutions meet or exceed applicable laws and standards.

"To address those challenges, Getinge has adopted and implemented a new Data Privacy Organization enabling us to more efficiently address local legal privacy issues and to spread the company's global Data Privacy Program, including best practices, directives, policies, guidelines, templates and provide training on general

data privacy topics", Anna Maria Gahm Lagerqvist says.

"In addition, we focus on our development of privacy-by-design requirements for product development and making adjustments to business processes and routines to make sure that any potential cross border data transfers are in line with the current case law and legal requirements", she adds.

### US patient data protection initiative

Recently, Getinge launched a broad-scale initiative to bolster its HIPAA program. HIPAA is the US legal framework governing the processing of protected health information – i.e. patient-related data. The goal of the initiative is to ensure that Getinge's data privacy and security controls incorporate HIPAA requirements as seamlessly as they incorporate GDPR and other data privacy legal requirements.



Anna Maria Lagerqvist Gahm,  
Head of Digital Law and IP

"Our HIPAA initiative is focused on our business practices, product development and technology security. Aligned with this work is our development of privacy- and security-by-design requirements for product development. These requirements build base line standards for our products from the outset and will help ensure that our products collect, store, and transmit personal data securely and in compliance with applicable laws in key markets", Anna Maria Gahm Lagerqvist says.

### "Prerequisites to succeed"

Anna Maria Gahm Lagerqvist is a business-oriented lawyer with a passion for intellectual property, information technology, IoT, digitalization, data privacy, people and leadership with more than 25 years' experience of working with IP and IT law. Before joining Getinge she held numerous positions in top law



firms and headed up teams both within the industry and private practice. The IP & Digital Law team she heads consists of patent engineers with various technical backgrounds and expertise, attorneys, paralegals and data privacy experts.

"We strive to drive innovation and create value through IP. This means that we file, prosecute and maintain Getinge Group's IP rights, providing competitor monitoring, FTO and clearance in product development". "Meanwhile, as responsible for the global Data Privacy Program at Getinge and

in cooperation with our regional data protection representatives, we ensure compliance of relevant data privacy requirements and frameworks on relevant markets,"

"My aim is that Getinge will have a truly business driven IP & Digital Law management going forward". "With the new Data Privacy Organization in place, an IP operating model that enables the implementation of the strategies we've set out and the right resources in the IP & Digital Law team, we have the prerequisites to succeed", Anna Maria Gahm Lagerqvist says.



# Health Care Compliance

Getinge manufactures, markets, sells and distributes medical products to Health Care Professionals (HCPs) and Health Care Organizations (HCOs) around the world. Interactions with HCPs and HCOs are heavily regulated and violations of these rules carry significant risks to the company. The Health Care Compliance (HCC) program exists to provide advice and to collaborate cross-functionally to build and maintain a control framework to mitigate risk.

## Challenging Areas

The HCC program sets global-level, baseline standards for interactions HCPs and HCOs. Regional implementation of these standards and the addition of regional, supplementary guidance ensures that the program addresses local risk, particularly in high-risk countries. It is an ongoing challenge to strike a balance between robust global standards and local risk profiles.

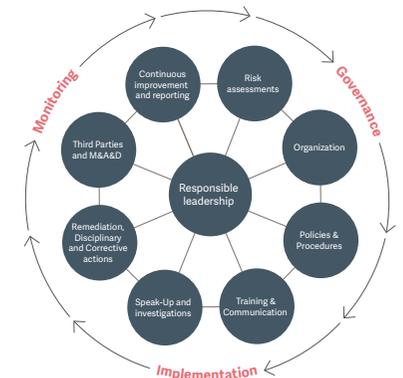
## Current focus

The primary focus of 2022 was to establish a Global HCC program within Getinge. Leadership appointed the first Head of Health Care Compliance within the Global Ethics & Compliance team in December of 2021. A Global

Directive on Interactions with Health Care Professionals and Health Care Organizations and 30 accompanying local directives have been implemented worldwide. Additional global-level directives will provide further guidance and establish baseline standards for higher-risk subject areas. A Global e-learning on Interactions with HCPs and HCOs was rolled out to 9,314 employees globally. The interactive and scenario-based training provides the learner with an opportunity to apply HCC concepts in real-world settings. Collaboration with stakeholders has been key to developing the HCC program. For example, in 2022, the E&C team collaborated with the Medical Affairs team and established global-level grant committees.

## Looking Ahead

Looking ahead, the HCC program will continue to collaborate with stakeholders to harmonize existing standards and establish baseline global standards and training for higher-risk subject areas. The program will also focus on standardizing ways of working with HCPs and HCOs by establishing common processes for HCP/HCO engagement.



Read more in the Global Anti-Bribery & Corruption Policy  
<https://www.getinge.com/int/company/business-ethics/policy-summaries/>

## INTERVIEW

## Enhancing Health Care Compliance through Collaboration

The medical device industry is highly regulated and many rules govern interactions with Health Care Professionals and Organizations. Getinge has increased its focus on this area by creating a dedicated role for Health Care Compliance (HCC) and consolidating Medical and Clinical Affairs into an independent, global function. Collaboration and cooperation between Ethics & Compliance and the Medical & Clinical Affairs teams is an important part of the effort to reinforce Getinge's Health Care Compliance program.

“Working together with relevant stakeholders, such as Medical Affairs, is key to building structures to support compliance with relevant rules and standards. We want to ensure that processes and other risk-mitigating controls are tailored to our company and will work in practice,” says Alexis Wermuth, who is the Head of Health Care Compliance in the Global Ethics & Compliance team.

“Health Care Professionals demand a deeper level of interaction with companies' clinical experts. The Medical Affairs team is uniquely fitted to nurture this function and provide opportunities for developing new

research, sharing outcomes data, and discussing unmet medical needs without any commercial influence,” says Dr. Pierluca Lombardi, cardiovascular surgeon, Getinge's Corporate Medical Officer, and head of the newly formed Global Medical and Clinical Affairs organization.

Over the past year, the Health Care Compliance and Medical Affairs teams have collaborated on several initiatives to harmonize and globalize standards related to interactions with Health Care Professionals (HCPs) and Health Care Organizations (HCOs). One such initiative was to establish global-level research and educational grant committees. Dr. Lombardi and his Medical

& Clinical Affairs team chair these committees. This team is exceptionally qualified for this role because they have an in-depth knowledge of science and medicine, which helps them to evaluate potential grant opportunities with the intention to advance and improve patient care worldwide. This helps to ensure that company funds are used properly to support research and educational programs in the spirit of global citizenship.

Going forward, the Health Care Compliance and Medical Affairs teams will continue to work together to establish global-level processes and standards which not only mitigate risk from a Health Care Compliance



Alexis Wermuth,  
Head of Health Care Compliance



Dr. Pierluca Lombardi, cardiovascular surgeon,  
Getinge's Corporate Medical Officer, and head of  
Global Medical and Clinical Affairs organization.

perspective, but also facilitate cooperation across regions.

“Most of our customers are HCPs or HCOs, and every employee who interacts with them must have the guidance and tools they need to help them act responsibly,” says Ms. Wermuth.

“We have a great responsibility in terms of patient safety and how public funds are spent in relation to our products and services. Securing integrity and transparency when interacting with health care professionals and health care organizations is a top priority,” says Dr. Lombardi.



# Trade Compliance

Getinge's life saving products are sold globally. With increased geopolitical tension the area of trade compliance has been in the spotlight during the year.

## Challenging Areas

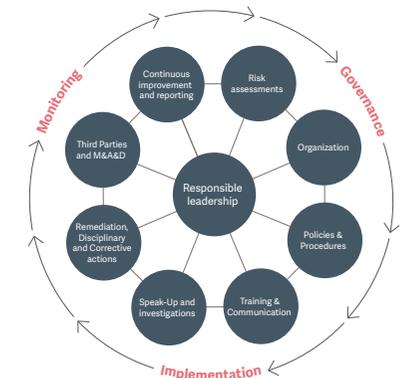
The management of Trade Compliance – where customs, export control and sanctions are included – is a vital function as we distribute to many different business partners around the world. As the landscape around trade regulations change rapidly and the global supply chain gets more and more complex, a strong and robust trade compliance process is a must.

## Current focus

Getinge is focusing on implementing an updated Trade Compliance process reflecting today's challenges, as well as giving the business areas the tools needed to adhere to increasing requests in the area.

## Looking Ahead

Going forward the company see an increasing demand for support in the area and being proactive is one of the ways for Getinge to make it easier to do the right choices. Getinge will also continue to invest in the organization and technology to manage its import and export activities.



Read more in the Global Trade Compliance  
<https://www.getinge.com/int/company/business-ethics/policy-summaries/>

**GETINGE** 



Getinge AB  
Lindholmspiren 7A  
P.O. Box 8861  
SE-402 72 Gothenburg  
Sweden

Tel: +46 (0)10 335 00 00  
E-mail: [info@getinge.com](mailto:info@getinge.com)  
[www.getinge.com](http://www.getinge.com)