

Healthcare Compliance Policy

- 1.1 This Healthcare Compliance Policy ("**the Policy**") is made on behalf of B. Braun Medical Limited and its subsidiaries (B. Braun Sterilog Limited and B. Braun Sterilog (Yorkshire) Limited) and B. Braun Avitum UK Limited (herein known as "**B. Braun**").
- 1.2 This Policy is included in the Quality Management System. It should be read by all employees of B. Braun who have any direct contact with Healthcare Professionals ("**HCPs**") and/or Healthcare Organisations ("**HCOs**"). B. Braun's Senior Management Team should ensure that all members of their individual teams understand and comply with this Policy. All questions or queries about the Policy should be referred to the UK Compliance Officer.
- 1.3 B. Braun is subject to the following Legislation, Regulation, Codes of Practice and Guidelines ("**the Rules**") in relation to its interactions with HCPs/HCOs, and in particular what benefits, advantages or other contractual arrangements it has with them, or provides to them, beyond the sale of goods and services ("**HCP/HCO Funding**"):
- The UK Bribery Act 2010 and other local and international anti-corruption legislation;
 - The ABHI/MedTech Europe Codes of Business Practice;
 - The ABPI / PCMA Codes of Business Practice;
 - B. Braun Organisational Guideline 232E/16;
 - B. Braun Code of Conduct;
 - NHS Conflicts of Interest Guidelines; and
 - The Nursing and Midwifery Council Code of Professional Conduct.
- 1.4 B. Braun is an ethical company and treats all customers, suppliers and competitors fairly and equally. B. Braun will only do business on this basis and will not engage in any corrupt, anti-competitive or unethical business practices. All of B. Braun's business dealings are transparent, fully documented and sustainable.
- 1.5 In accordance with the Rules, nothing B. Braun does, with regard to HCP/HCO Funding, is intended to improperly reward, incentivise and/or cause any HCP or HCO to improperly purchase, prescribe, recommend or use B. Braun's products or services. B. Braun does not give any illegal or unjustified benefits or advantages to its customers, suppliers or competitors nor does it accept any illegal or unjustified benefits or advantages from its customers, suppliers or competitors.
- 1.6 B. Braun has an effective Healthcare Compliance Strategy ("**the Strategy**"), Healthcare Compliance Procedure ("**the Procedure**") and a suite of documents, together with appropriate communication and training schemes, to enable it to remain compliant with the Rules and to support its employees in all their business dealings and in particular with HCP/HCO Funding.
- 1.7 The UK Compliance Officer and the Executive Committee ("**EC**") will monitor and enforce compliance with this Policy, the Strategy, the Procedure and the correct use of the documents, any breaches will be dealt with accordingly.



Michael Parden Managing Director



Donna Gold UK Group Legal Counsel and Compliance Officer