

Code of Business Conduct

Contents

Message from Dan	2
Our Mission, Vision and Values	4
Global Ethics and Compliance Policy	4
STERIS Workplace	5
Following Laws and Regulations	5
Interactions with Healthcare Professionals	7
Third Party Relationships	7
Protecting Company Assets	8
Quality and Marketing Integrity	9
Health, Safety and the Environment	9
Privacy and Use of Social Media	10
Disciplinary Action and STERIS Helpline	10
Integrity Helpline Reporting	11
Integrity Webline Reporting	13
Conclusion	13

Our Mission, Vision and Values

MISSION

WE HELP OUR CUSTOMERS CREATE A HEALTHIER AND SAFER WORLD by providing innovative healthcare and life sciences products and services around the globe.

VISION

WE STRIVE TO BE A GREAT COMPANY. We provide world-class product and service solutions for our Customers, safe and rewarding work for our people, and superior returns for our Shareholders.

VALUES

- CUSTOMERS FIRST ALWAYS. Our Customer is the most important person in our business, to be treated with the utmost respect. No business activity, other than safety, is more important than listening, learning and providing superior product and service solutions to our Customers.
- PEOPLE THE FOUNDATION. We are committed to the safety and success of our people. We expect the performance of every person to continually improve with personal initiative and proper support. We treat each other with mutual respect and have fun in our work.
- INNOVATION THE BEST. We are leaders not followers. Our company is built on a collection of innovative ideas and a passion for continuous improvement. We challenge the status quo and take measured risks, exploring big and small ideas that improve our petformance daily0 1 Tf 0.. of7 (N)]TJ /TT0.5 (r)-4,11.5 (EST)-120413 0 Td [id(i)2.6 (nnov)15.9 (at)-6.6 (lusoust dod fmr tow(c)-2 ou(l)2.6 nd id(i)2.6 (v)-2 inually. W

Global Ethics and Compliance Policy

STERIS plc ("STERIS" or the "Company") requires all Associates within the STERIS plc group of companies to be lawful and ethically responsible in all business practices. We are devoted to sustaining a work environment that promotes honesty, integrity, respect, trust, diversity and responsibility. Above all, we are responsible for our actions and for adhering to ethical and legal rules. This Code of Business Conduct applies to STERIS plc and all of its subsidiaries and affiliates.

STERIS Workplace

STERIS Associates are expected to conduct themselves in a manner that is appropriate for the work environment and consistent with our values.

Prohibition of Harassment and Discrimination

The Company is committed to an environment free from harassment (including sexual harassment and bullying) and discrimination. As a result, it is the policy of STERIS to prohibit harassment or discrimination due to age, sex, gender, pregnancy, race, color, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status. It is also our policy to prohibit discrimination for any other legally protected characteristic.

Anti -Retaliation Policy

It is the policy of STERIS to not permit any form of retaliation against another individual for reporting a violation of this Code or any other STERIS policy. Acts of retaliation are considered a violation of the Code and are subject to disciplinary action appropriate to the situation.

Human Rights and Labdsto

the STERIS Employee PAC on a voluntary basis. Associates may not, however, commit Company resources to political campaigns without approval from the STERIS Legal Department and the CEO.

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

Recruiting and employing former or current government officials or employees is also subject to special laws and possible restrictions. These rules may also apply to family members of the government official or employee. Contact the STERIS Legal Department concerning potential hires of government officials or employees.

Anti -Bribery and Anti -Corruption

Bribery and corruption are unlawful and are strictly prohibited by STERIS policy and this Code. STERIS Associates and others acting on STERIS's behalf are prohibited from authorizing, paying, promising or offering anything to any individual or entity in order to improperly influence any individual or entity in the conduct of business or to gain a business advantage. Any STERIS Associate who accepts or requests a bribe in connection with a transaction is also considered to

prohibit doing business with certain entities, individuals, or countries where trade-restrictions are in place, and in complying with applicable anti-boycott regulations. STERIS Associates have the responsibility to remain watchful for the intended end-destination of our products and services. If trade practices are questioned, or if you have doubts about how to interpret the regulations for certain countries, contact the STERIS Legal Department.

Insider Trading Policy

STERIS Associates, senior managers, and directors are prohibited from engaging in transactions in the Company's securities while in possession of material non-public information and may also be prohibited from engaging in transactions during certain "blackout" periods. Providing (or "tipping") material non-public information to others is also prohibited. Examples of material non-public information include unpublished financial data, pending Company transactions (e.g., acquisitions, divestments), litigation developments, governmental investigations, and changes to business strategies. Failure to comply with this policy can lead to serious sanctions by the Company up to and including termination. For questions or clarification on the Insider Trading Policy, contact the STERIS Legal Department.

Interactions with Healthcare Professionals

In the course of conducting business, many STERIS Associates interact with healthcare professionals. We recognize that these interactions are subject to certain restrictions. Through our membership in industry trade associations, we agree to adhere to certain principles when interacting with healthcare professionals.

Among the industry trade associations with whom we have chosen to participate is the Advanced Medical Technology Association (AdvaMed). The Company is proud to be a supporter of AdvaMed's Code of Ethics on Interactions with U.S. Healthcare Professionals. Among other topics, the AdvaMed Code defines restrictions relating to gifts, entertainment, donations, meals and meeting locations when interacting with healthcare professionals. All STERIS Associates who interact with U.S. healthcare professionals must adhere to the AdvaMed Code. Questions about industry codes, including the AdvaMed Code, should be directed to the STERIS Compliance or Legal Departments.

Third Party Relationships

Relationships between STERIS and the entities with whom we do business, including Customers, suppliers, agents, distributors, and regulatory agencies are required to be ethical and in line with the principles outlined in this Code. Relationships with third parties, as well as all business decisions, must be based on what is required by ethical behavior, what is in compliance with law, and what is in the best interests of STERIS, and must not be motivated or influenced by personal considerations.

Conflicts of Interest

STERIS Associates must avoid situations where their personal interests conflict, or appear to conflict, with the interests of the Company or its Customers. A conflict of interest exists when an Associate has a private, personal or commercial interest which is likely5 -1.239 exirei-105(ex)711s

Examples of conflicts of interest include:

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

Any activity an Associate partakes in that could potentially create a conflict of interest, or which could create the appearance of a conflict of interest, should be brought to the attention of the STERIS Internal Audit, Compliance or Legal Departments.

Protecting Company Assets

Accounting Information and Records Management

Laws are in place that require accuracy in the recording of all transactions, including sales of property, inventory or services. Any exchange of Company funds must be recorded within the framework of generally accepted accounting principles. Any transaction "off the record" is strictly prohibited. Destruction of any documents or records, especially of a financial nature, before the retention period expires is unlawful and subject to penalties.

Acts of falsifying records, nondisclosure of transactions, or destroying documents to avoid legal responsibilities are considered violations of the Code and can lead to civil or criminal liability. Contact the STERIS Accounting, Legal or Regulatory Departments if you have questions or concerns about recordkeeping requirements.

Intellectual Property and Confidential Information

STERIS Associates may have access to confidential or proprietary information owned by the Company. Such confidential information must not be disclosed to third parties without appropriate approvals.

Confidential information is information not generally known or readily available to others outside the Company. Examples of confidential information include technical know-how and data, trade secrets, business plans, marketing and sales programs, and sales figures. It also includes information related to mergers and acquisitions, stock splits, divestitures, licensing activities, and changes in senior management.

Personal information about STERIS Associates, such as salaries, benefits, and information contained in personnel files is also considered confidential. If you are not sure if you can disclose information to a third party, con (i)2.6 5rm0.315 0 T]TJ 0 Tc 0 Tw [(A)4 (sso)12.m7 8 (al)2.as

Quality and Marketing Integrity

All Associates must adhere to controls regarding product regulatory approvals, good manufacturing practice requirements, design, labeling, advertising, and other applicable controls. Marketing of STERIS products and services must be done honestly and with integrity, ensuring STERIS remains a trusted name and we continue to maintain our reputation as a reliable entity. False advertising of a product or inaccurately documenting a product's evolution is unethical and can lead to disciplinary action. For questions or concerns regarding product rules, consult with the STERIS Legal Department.

Health, Safety and the Environment

STERIS is committed to sustainability and to helping our Customers create a healthier and safer world. We are responsible for maintaining these principles for the good of our Associates and the community in order to be a good neighbor.

Environmental and health and safety laws are complex, subject to frequent changes, and vary from country to country. Abiding by these laws exhibits a respect for the environment and each other. Associates should seek the advice of an appropriate Health, Safety and Environmental Department Associate, or the STERIS Legal Department about the application of these laws and compliance with STERIS's policies, which may be more stringent than applicable laws.

Workplace Safety

All Associates of STERIS are responsible for the safety and well-being of themselves and their co-workers. We are all obligated to report actions or situations that are unsafe and to know how to proceed if we are involved in an unsafe act.

Furthermore, we are obligated to understand how to be safe at work and follow the appropriate policies and procedures. For example, we need to wear the appropriate personal protective equipment, know where exits are in case of fire, and be aware of who to call for help should a safety concern arise. Any hazardous or unsafe observations must be reported immediately to your supervisor and the appropriate Health, Safety and Environmental representative.

Sustainability

STERIS has focused on sustainable business practices for years, with much good work being done across our operations and around the world. Sustainability at STERIS centers around four key areas:

- Ethical Business Practices We expect ethical behavior in all our dealings, which includes abiding by all laws and regulations when transacting business and act transparently.
- Energy and Conservation We are committed to eliminating waste and using resources responsibly.
- People and Community We engage Associates with meaningful work, continuous educational opportunities and personal assistance. We listen to our people's ideas and

unsafe situations or environmentally unfriendly behaviors and minimize or eliminate them when we see them.

Privacy and Use of Social Media

Data Protection and Privacy

STERIS Associates who handle personal data must ensure data is processed in accordance with our policies and must report any suspected security incidents to their supervisor and the STERIS Data Protection Officer. It is the policy of STERIS to only process personal data in accordance with applicable law. Appropriate technical and (t)-6.8o10.5 (r)4.9 (vga)0.7 (90 c 0 Tw 8.. P)2.7 (50 (and (tax)

compliance related matter by speaking with your Supervisor, please contact a representative of

Integrity Helpline Phone Numbers

Australia Helpline: (Optus) 1-800-551-155 (Telstra) 1-800-881-011 Access Code: 844-627-6887	Austria Helpline: 0-800-200-288 Access Code: 844-627-6887	Belgium 0800-81-992	Brazil 0800-047-4167	Canada 1-855-326-9721
China 400-9-906-644	Costa Rica <u>Helpline:</u> 0-800-011-4114 0-800-225-5288 0-800-228-8288 <u>Access Code:</u> 855-607-8702	Czech Republic 0800-050-195	Finland 0800-774282	France 0805-54-24-77
Germany 0800-7243728	Greece <u>Helpline:</u> 00-800-1311 <u>Access Code:</u> 844-627-6887	Hong Kong <u>Helpline:</u> 800-93-2266 <u>Access Code:</u> 844-627-6887	Hungary 06-800-21-501	India Helpline: 000-117 Access Code: 855-607-8702
Ireland 1800-800725	Israel Helpline: (Golden lines) 1-80-922-2222 (Barak) 1-80-933-3333 (Bezeq) 1-80-949-4949 Access Code: 844-627-6887	Italy 800-902-931	Japan <u>Helpline:</u> (NTT) 0034-811-001 (KDDI) 00-539-111 (Softbank Telecom) 00-663-5111 <u>Access Code:</u> 844-627-6887	Malaysia 1800-88-5782
Mexico 01-800-253-0492	Netherlands 0800-020-0849	Singapore 1800-622-7295	Slovak Republic 0800-141-665	Slovenia 080828025
South Africa 0800-167452	Spain 900-822-590	Switzerland 0800-001-311	Thailand 1800-011-569	United Arab Emirates <u>Helpline:</u>
United Kingdom 0800-028-3391	United States 1-855-326-9721			8000-021 (du) 8000-555-66 (Military-USO and cellular) 8000-061 Access Code: 844-627-6887

Toll-Free Service

- 1. Dial your country/carrier specific telephone number. This is a free call.
- 2. You can opt to give your report in English or your native language. You will hear a recorded message in your native language explaining the call process.
- 3. An English-speaking representative will begin the process. He or she will then bring into the ngctint eves le (c) all 1 as 9 to 9 to 100 to