



CODE OF CONDUCT

A Letter from our Chief Executive Officer, Hank Struik

We have grown significantly over the last few years yet what has not changed is our dedication to *Excellence with Every Breath*. In fulfilling that mission, we are guided by our values: customer first; differentiate with our people; bias for action; continuous improvement; and accountability. Holding ourselves accountable to those values in our daily actions and decisions is critical to our success.

At AirLife, we trust our team to make decisions on behalf of the company that align with our Code of Conduct, our values, and our best judgment.

Our Code of Conduct serves as our guiding principles allowing us to bring more to our customers than our life saving products: we bring customers a dedicated team committed to doing the right thing and who takes pride in our purpose and accomplishments by knowing what matters most.

We each share a commitment to do right by our customers, our employees, and the communities we serve. We strive to be the leader in respiratory and anesthesia consumables by following our values and the guiding principles reflected in our Code of Conduct.

Read our Code of Conduct carefully and apply it to your work each day. When we each operate from the same set of values, we maintain our reputation, which is one of our most important assets as an organization. Take responsibility for protecting our reputation, and we will continue providing customers with peace of mind for years to come.

Sincerely,



Hank Struik, CEO





Mission:

Dedicated to improving quality of life.

Quality Policy:

At AirLife, quality is our promise. It is our commitment to customer satisfaction and our dedication to product excellence in an evolving global healthcare market. This promise is kept through a continuously improving and effective Quality Management System and compliance to Regulatory Requirements.

Diversity, Equity, Inclusion and Advancement Statement:

At AirLife, we are committed to building a diverse workforce and an inclusive workplace that reflects the communities and customers we serve.

We believe our philosophy on diversity, equity, inclusion, and advancement (DEIA) encourages excellence and equips us to serve an evolving global marketplace.

Values:

Customer First – We are committed to providing best-in-class service, quality, and customer satisfaction. We actively listen and communicate with our customers to ensure we understand the challenges they face and deliver on our promises with the goal of exceeding their expectations.

Differentiate with Our People – We appreciate people of different backgrounds and points of view. We build confidence while demonstrating a positive and energizing style. We demonstrate conviction in our beliefs, sharing opinions honestly and respectfully. We promote improvement of leadership bench strength and diversity.

Bias for Action – We explore new possibilities and are willing to approach issues differently. We value consistency and assess our decisions and actions on financial implications and the impact on our customers. We identify meaningful goals and capture the imagination of others to achieve it.

Continuous Improvement – We value the allocation of resources, time, and efforts to drive critical issues and activities. We construct meaningful strategies to address the known and unknown of future business scenarios, measuring and reassessing as we work.

Accountability – We have an uncomplicated and uncompromising understanding of right from wrong, both publicly and privately. We know collaborating in a way that brings out the best attitude and performance in all is non-negotiable. We stay the course from start to finish and focus on our desire to achieve a goal rather than fear failure because results matter.



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OVERVIEW:

We are pleased to provide our Code of Conduct which details the values and standards that guide our work at AirLife. This Code of Conduct provides a detailed view of our expectations and standards for situations you may encounter. It is our responsibility at AirLife to ensure our actions are guided by our Code of Conduct to promote integrity and ethical conduct.

Who Must Follow This Code:

Our Code of Conduct applies to everyone at AirLife, including our employees, officers, and directors. We also expect our consultants, contractors, agents, suppliers, service providers, vendors, and temporary employees to act in alignment with our Code of Conduct. It is essential that we commit to complying not only with the letter but also the essence of these standards. Although the Code of Conduct covers some examples of ethical and business issues and scenarios, a single document cannot provide all the answers. Additional guidance is provided in the form of policies and procedures in our Employee Handbook. Please be aware that just as industry standards and legal and regulatory requirements evolve, our standards, policies and procedures are amended from time to time. For the most current information, you should review our Code of Conduct and Employee Handbook located in ADP Workforce Now.

The Code of Conduct is a guideline for employees and is not intended to constitute a complete and final list of all possible ways to conduct yourself when representing the company. This list applies to employee conduct: (a) in the workplace; (b) at any AirLife-sponsored event, including national sales meetings, mid-year meetings, business dinners, company organized events etc.; (c) when representing AirLife at a customer account or at an industry meeting/event or anywhere else; and (d) in any circumstance when the following behavior may impact relationships, morale, and/or productivity in the workplace.

We operate in multiple countries, so it is important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners, and coworkers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, employees should seek guidance from their manager, Human Resources, or Legal.

Making Good Decisions:

Employees, officers, directors, and people acting on behalf of AirLife have a responsibility to:

- Act in a professional, honest, and ethical manner when conducting business on behalf of AirLife.
- Complete all required employee training in a timely manner and keep up to date on current standards and expectations.
- Report concerns and/or possible violations of our Code, our policies or the law to their manager, Human Resources, Legal, or the Ethics and Compliance Hotline.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.



Additional Responsibilities for AirLife Managers:

- Lead by example. Exemplify high standards of ethical business conduct by reinforcing employees to act with integrity.
- Help create a work environment that values mutual respect and open communication.
- Make sure employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation.
- Respond quickly and effectively when a concern is brought to a manager's attention. It is the manager's responsibility to ensure that it is treated seriously and with respect for everyone involved.
- Identify compliance risks and take prompt action to address them.

Speaking Up:

We ask that if you see or suspect unethical conduct, you speak up. You can do so by reaching out to your manager, Human Resources, Legal, or the Ethics and Compliance Hotline to report your concerns. AirLife will make every reasonable attempt to ensure that concerns are addressed appropriately.

Ethics and Compliance Hotline:

The Ethics and Compliance Hotline and intake forms are available 24 hours a day, seven days a week and have translators available in over 150 languages. Trained specialists from NAVEX, an independent third-party provider, will answer all calls, document all concerns, and forward a written report to AirLife for further investigation. A submission to the Ethics and Compliance Hotline can be made on the phone, internet, or a mobile device.

When employees contact the Ethics and Compliance Hotline, they may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not. After an employee makes a report, he/she will receive an identification number so he/she can follow up on his/her concern. Following up is especially important if the employee submits a report anonymously, as AirLife may need additional information in order to conduct an effective investigation. This identification number will also enable the employee to track the resolution of the case; however, please note that out of respect for privacy, AirLife will not be able to inform the employee about individual disciplinary actions.

Confidentiality:

The identity of individuals making or involved in a report will be protected to the extent possible. Employees can also make an anonymous report through the Ethics and Compliance Hotline. Any investigation will be conducted fairly and appropriately.

Retaliation:

AirLife prohibits retaliation against an employee because the employee opposes any form of harassment, discrimination, or retaliation or participates in a proceeding regarding harassment, discrimination, or retaliation, including participation by filing, reporting, complaining, testifying, or assisting in any other manner in an investigation, proceeding or hearing. AirLife will not discharge, demote, suspend, threaten, harass or, in any manner, retaliate against an employee based on that employee truthfully raising a



concern about any actual or suspected misconduct or other risks to the business. If you believe you have been retaliated against for raising a concern, immediately contact Human Resources, Legal, or use the Ethics and Compliance hotline to submit a report.

STANDARDS OF BUSINESS CONDUCT:

Environment, Health, and Safety:

AirLife cares about you and your family and expects you to make the right choices concerning safety. Employees are expected to follow safe work practices including wearing the required personal protective equipment (PPE), report injuries and hazards, complete all required safety training, and encourage fellow team members to do the same.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for AirLife and for every employee on the job. Each employee should do their part to keep everyone in the AirLife family injury-free.

Harassment-free Workplace:

Harassment is conduct that is directed to, related to, or focused on a person's Protected Status and can reasonably be characterized as offensive, hostile, or abusive. The conduct can occur through verbal action, non-verbal/visual action, physical action, emails, text messages, social media, or in any other manner. While it is not easy to define precisely what harassment is, it includes slurs, epithets, bullying, threats, derogatory comments, unwelcome jokes, teasing and other similar verbal, visual or physical conduct. Sexual harassment, in particular, includes unwelcome explicit or insinuated sexual advances, flirtations, requests or propositions for sexual favors, leering or sexual gestures, unsolicited and non-accidental touches, references to sexual preference or stereotype, display of sexually suggestive objects or pictures, impeding or blocking movement, or other unwelcome sexual, verbal, visual or physical conduct of a harassing nature if: (1) submission to the conduct is a term or condition of employment or continued employment, whether explicitly or implicitly, (2) submission to or rejection of the conduct is used as a factor in a decision affecting the individual's employment, or (3) the conduct or communication substantially interferes with the individual's employment or creates an intimidating, hostile or offensive work environment.

AirLife prohibits harassment on any basis. Bullying and hostile or abusive conduct that denigrates, shows aversion, or is offensive to another person violates this policy even if it is not technically illegal. All employees are expected and required to behave in a professional, appropriate, and respectful manner.

Diversity, Equity, Inclusion and Advancement:

Our colleagues, job applicants and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to contribute to our growth and grow with us. To uphold that commitment, we support laws prohibiting discrimination and



provide equal opportunity for employment, income, and advancement in all our departments, programs, and worksites.

This means we base employment decisions solely on qualifications, demonstrated skills and achievements - and never on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, disability, genetic information or any other characteristic protected by law.

Confidential Information:

In the course of employment with the Company, employees may have access to “Confidential Information” regarding the Company, which may include its business strategy, future plans, financial information, contracts, suppliers, customers, personnel information or other information that the Company considers proprietary and confidential. Maintaining the confidentiality of this information is vital to the Company’s competitive position in the industry and, ultimately, to its ability to achieve financial success and stability. Employees must protect this information by safeguarding it when in use, using it only for the business of the Company and disclosing it only when authorized to do so and to those who have a legitimate business need to know about it. This duty of confidentiality applies whether the employee is on or off the Company’s premises, actively employed or even after the end of the employee’s employment with the Company. This duty of confidentiality also applies to communications transmitted by the Company’s electronic communications platforms.

Financial Integrity and Records Management:

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and others. AirLife's books and records must accurately and fairly reflect its transactions in sufficient detail and in accordance with accounting practices and policies.

All employees contribute to the process of recording business results or maintaining records. Employees should ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with internal controls and legal obligations.

In terms of Records Management, employees should only dispose of documents in compliance with AirLife policies and never destroy or hide them. Employees must never conceal wrongdoing, or permit others to do so, or destroy documents in response to or in anticipation of an investigation or audit. Employees with questions or concerns about retaining or destroying corporate records should contact the Legal department or our Director of Quality.

Cooperation with Investigations and Audits:

From time to time, employees may be asked to participate in internal and external investigations and audits conducted by AirLife. All employees are expected to fully cooperate with all such requests and ensure that any information provided is true, accurate and complete. Employees may also receive inquiries or requests from government officials. If an employee learns of a potential government investigation or inquiry, the employee should immediately notify his/her manager and Legal before taking or promising any action. If an employee is directed by AirLife to respond to a government official's



request, such employee should extend the same level of cooperation and again, ensure that the information provided is true, accurate and complete.

Conflicts of Interest:

A conflict of interest can occur whenever an employee has a competing interest or activity that may interfere with his or her ability to make an objective decision on behalf of AirLife. Each employee is expected to use good judgment and avoid situations that can lead to the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, each employee needs to fully disclose them to his/her manager so that they can be properly evaluated, monitored, and managed.

Further details on our Outside Employment ("Moonlighting") and Other Conflicts of Interest and Employment of Relative policies can be found in our Handbook.

Anti-bribery and Corruption:

AirLife is committed to complying with all applicable anti-corruption laws. We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents AirLife.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all business partners who work on our behalf, particularly when dealing in countries with high corruption rates and in any situations where "red flags" would indicate further screening is needed before retaining the business partner. Our partners must understand that they are required to operate in strict compliance with our standards and must maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.

Anti-money Laundering:

Money laundering is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose AirLife and the individuals involved to severe sanctions.

We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate. Employees should report any suspicious financial transactions and activities to Legal and, if required, to appropriate government agencies.

Gifts and Hospitality:

A modest gift may be a thoughtful "thank you," or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision. Employees



should only offer and accept gifts and entertainment that comply with our policies, and they should make sure that anything given or received is accurately reported in our books and records.

The acceptance of any gift or service by an employee, or member of his or her family, from any supplier or contractor that is offered as an inducement to use the goods and services of the company is considered to be a conflict of interest and is prohibited.

Government Officials:

Be aware that the rules for what AirLife may give to or accept from government officials are much stricter. Employees should not offer anything of value to a government official without obtaining approval, in advance, from Legal. Regardless, AirLife does not accept or provide gifts, favors or entertainment to anyone, even if it complies with AirLife's policies, if the intent is to improperly influence a decision.

Fair Competition:

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so employees should seek help with any questions about what is appropriate and what isn't.

Global Trade:

AirLife has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import, export, and re-export of our products, and with the laws of the countries where our products are manufactured, repaired, or used. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. Employees should promptly report to Legal any request to join in, support or furnish information concerning a non-U.S.-sanctioned boycott.

Supplier Relations:

AirLife evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements.

All agreements are negotiated in good faith and must be fair and reasonable for both parties. Employees should hold AirLife business partners to high standards and ensure they operate ethically, in compliance with the law and in a way that's consistent with this Code, our policies and our Values.

Government Contracting:

We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoices, sub-contracting, employment practices, contract performance, gifts and entertainment, purchasing and other matters. These requirements may also flow down to individuals and companies working on our



behalf. Employees responsible for conducting business with the government on behalf of AirLife should know and comply with what's contractually required as well as all laws and regulations that apply to our government-related work.

Human Rights:

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

AirLife will not, and does not support suppliers who, use involuntary labor of any kind, including prison, debt bondage or forced labor. We only employ workers who meet the applicable minimum legal age requirement in the country where they are working or are at least 14 years old, whichever is greater, and only support suppliers doing the same. AirLife complies, and expects its suppliers to comply, with all applicable child labor laws and industry best practices. Working hours, wages and overtime pay must comply with all applicable laws. Workers must be paid at least the minimum legal wage or a wage that meets local industry standards. Each employee can help support efforts to eliminate abuses such as child labor, slavery, human trafficking and forced labor.

Charitable Activities:

Corporate social responsibility is an integral part of AirLife's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As an organization, we contribute funds, time, and talent to support organization-wide programs and local causes. We encourage (but do not require) employees to participate in the many initiatives we support.

AirLife also encourages employees to make a difference on a personal level by supporting charitable and civic causes that are important to them. Such activities must be lawful and consistent with our policies and employees should be participating on their own time and at their own expense. Employees should never pressure their colleagues to participate and unless approved in writing in advance, employees should never use AirLife funds, assets or the AirLife name to further any personal volunteer activities.

Political Contributions:

Each employee has the right to voluntarily participate in the political process, including making personal political contributions. However, employees must always make it clear that their personal views and actions are not those of AirLife, and they should never use AirLife funds, time or the AirLife name for any political purpose without proper authorization.

Environmental Stewardship:

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment, as well as any potential harm to the health and safety of employees, customers, and the public.



Where to go for Help:

Human Resources:

Suzanne Kaupa, VP of Human Resources, SKaupa@sun-med.com, (269) 235-4817

Shawna Clauser, Director of Global HR Talent Management, SClauser@sun-med.com, (269) 312-0818

Carmen Marney, Senior Manager, HR Operations, CMarney@sun-med.com, (269) 841-6258

Amanda Short, Associate HR Manager, AShort@sun-med.com, (269) 615-0993

Legal:

Caitlin Anderson, CAO & General Counsel, CAnderson@sun-med.com, (310) 902-1601

Ethics & Compliance Hotline:

Worldwide Mobile Intake Form: www.sunmedmobile.ethicspoint.com

Worldwide Web Intake Form: www.sunmed.ethicspoint.com

U.S. Hotline: 1-833-254-2201