

# THE SPIRIT & THE LETTER

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**Need more help?** Visit [compliance.health.ge.com](https://compliance.health.ge.com) to:

- Find a business compliance leader
- Raise a concern
- Review policies
- Download and view job aids, videos and **more!**

## Learn Our Policies – THE LETTER

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# The Spirit

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The Spirit embodies our promise to act ethically at all times. At GEHC, we commit to doing the right thing, always with unyielding integrity.



# Ethics: *The GEHC Way*



## KEY PRINCIPLES

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- 1 | Be honest, fair and trustworthy in all of your GEHC activities.
- 2 | Obey applicable laws and regulations governing our business worldwide.
- 3 | Fulfill your obligation to be the Voice of Integrity and promptly report any concerns you have about compliance with law, GEHC policy or this Code.



## KEY QUESTIONS

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The Spirit & The Letter is not a substitute for your good judgment, and it cannot cover every conceivable situation. You should be alert to signs that you or your colleagues are in an integrity gray area and ask yourself three simple questions if you have any doubts about what you should do:

1. How would this decision look to others within GEHC and externally?
2. Am I willing to be held accountable for this decision?
3. Is this consistent with GEHC's Code of Conduct?

**Remember:** Act if you see an issue. Ask if you are unsure.

# Who Should Follow These Policies



**The Spirit & The Letter must be followed by anyone who works for or represents GEHC.**

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## THIS INCLUDES

- GEHC directors, officers and employees.
- Subsidiaries and controlled affiliates. Entities in which GEHC owns more than 50 percent of voting rights, or which GEHC has the right to control, are required to adopt and follow GEHC compliance policies.

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*Non-controlled affiliates should be encouraged to adopt and follow GEHC compliance policies.*

## GEHC EMPLOYEES WORKING WITH THIRD PARTIES

**such as consultants, agents, sales representatives, distributors and independent contractors must:**

- Require these parties to agree to comply with relevant aspects of GEHC's compliance policies.
- Provide these parties with education and information about policy requirements.
- Take action, up to and including terminating a contract, after learning that a third party failed to abide by GEHC's compliance policies.

**Important:** This Code and the policies described in it are not an employment contract. GEHC does not create any contractual rights, express or implied, by issuing the Code or the policies.



# What Employees Must Do

## BE KNOWLEDGEABLE

- Gain a basic understanding of the Spirit & Letter compliance policies.
- Learn the details of any Spirit & Letter policy that is relevant to your individual job responsibilities.
- Learn about your detailed business and regional policies and procedures and understand how to apply them to your job.

## BE AWARE

- Stay attuned to developments in your area or industry that might impact GEHC's compliance with laws and regulations or reputation in the marketplace.
- Understand GEHC may review, audit, monitor, intercept, access and disclose information processed or stored on GEHC equipment and technology, or on personal-owned devices permitted GEHC network access.

## BE COMMITTED

- Promptly raise any concerns about potential violations of law or GEHC policy.
- Cooperate fully and honestly in GEHC investigations related to integrity concerns.

## THE COST OF NONCOMPLIANCE

- Employees and leaders who do not fulfill their integrity responsibilities face disciplinary action up to and including the termination of their employment. The following examples of conduct can result in disciplinary action.

## EXAMPLES OF MISCONDUCT

- **Violating law or GEHC policy** or requesting that others do the same.
- **Retaliating against another employee** for reporting an integrity concern.
- **Failing to promptly report** a known or suspected violation of GEHC's compliance policies.
- **Failing to fully and honestly cooperate** in GEHC investigations of possible policy violations.
- **Failing as a leader** to diligently ensure compliance with GEHC's integrity principles, policies and law.

# What Leaders Must Do

**GEHC holds its leaders accountable for fostering a culture of compliance. Leaders' responsibilities span prevention, detection and response to compliance issues.**



## PREVENT

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- Incentivize compliance and personally set the example for integrity — not just through words, but more importantly, through actions.
- Never compromise integrity to meet a deadline, satisfy a customer or increase revenue.
- Promote Open Reporting and ensure employees know how to raise concerns and feel safe doing so.
- Ensure your team can recognize “red flags” for key risks and completes assigned compliance training in a timely manner.
- Help employees understand how and where to seek additional guidance and ask questions.
- Understand and follow the policies, laws and regulations that apply to your team. If unsure, ask an expert in Legal or Compliance.



## DETECT

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- Conduct periodic compliance reviews with the assistance of business compliance leaders and/or Internal Audit.
- Implement control measures to detect compliance risks and violations.



## RESPOND

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- Document and escalate any employee's expressed concern through the appropriate channels.
- Take prompt corrective action to address identified compliance weaknesses.
- Take appropriate disciplinary action.
- Integrate employees' integrity contributions into evaluations and recognition and reward programs.

# The Letter

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The Letter covers our Spirit & Letter compliance policies. These policies apply to all employees in every business, everywhere in the world. This Code provides an introductory summary to these policies — not the full policies themselves.

*Go to <https://compliance.health.ge.com> for the full policies, as well as detailed policy information and resources to help you.*





# Respectful Workplace

We treat one another with fairness and respect.



## THE GEHC WAY

- GEHC is committed to providing a safe, fair, and respectful work environment.
- GEHC does not tolerate any form of harassment, discrimination, or bullying.
- GEHC is an equal opportunity employer and makes all employment decisions based on legitimate business considerations, such as experience, skills, education, performance, and the GEHC Leadership Behaviors.

## YOUR ROLE

- Treat employees, applicants, customers, suppliers, contractors, and anyone else you interact with for or on behalf of GEHC with fairness and respect.
- Create and foster a work environment free from discrimination, bullying and harassment.
- Do not refuse to work or cooperate with others because of protected characteristics.
- Never make an unwelcome sexual advance to or create an unwelcome working environment for anyone you interact with.

## INTEGRITY IN ACTION

**Q:** During a recent team lunch, one of my colleagues made an off-handed joke about an ethnic stereotype. How should I respond to this situation?

**A:** You have a few different options. (1) Be direct, factual, and professional and inform the person that this is unacceptable: “What you said is inappropriate here” or “I was offended by what you just said” or “I was not offended, but someone else might be”; (2) Disrupt/redirect the conversation: “That wasn’t funny” or “We need to focus on the task at hand.” Later follow up with the person directly to be clear that the conduct was not acceptable and must stop; or (3) Raise an integrity concern through one of our Open Reporting channels.

## POLICY SPOTLIGHT

**Protected characteristics under GEHC policy include: race, color, religion, national or ethnic origin, ancestry, sex (including pregnancy and related conditions), gender (including gender identity and expression), sexual orientation, marital status, genetic information, age, disability, military and veteran status or any other characteristic protected by law.**



## POLICY SPOTLIGHT

**Fundamental human rights include decent and safe working conditions, freedom of association, prohibitions on forced and child labor, and respect for community security and the environment.**

# Human Rights

We respect and support human rights.

## THE GEHC WAY

- We respect all internationally recognized human rights in line with the *United Nations Guiding Principles on Business & Human Rights*.
- We seek to treat everyone affected by our business and value chain with fairness and dignity.
- Our commitment is to do our best to identify and address relevant risks by keeping our eyes always open to suspicious conditions and conducting reasonable due diligence.

## SUSPICIOUS THIRD-PARTY CONDITIONS TO REPORT

- Workers who appear below the age of 16 or the local legal working age, whichever is higher
- Unsafe working conditions or unsanitary worker living conditions
- Refusals by management to permit engagement with workers
- Refusals to allow workers to associate freely (formally or informally) to improve their workplace
- Visible signs of workplace abuse, including harassment, bullying, discrimination or violence
- Rumors of workers paying recruitment fees for their jobs, not being paid appropriately, or being coerced into working or remaining on a job through measures such as passport withholding

## YOUR ROLE

- Immediately notify your compliance leader or use standard GEHC Open Reporting channels if you observe any conditions or circumstances that reflect possible mistreatment of workers or other individuals in our value chain.
- Read GEHC’s public statements on human rights and participate in company training to understand how we can impact the human rights of our extended value chain.
- Respect the fundamental human rights of those with whom you interact and require the same of our suppliers, contractors and business partners.
- Exercise an “Eyes Always Open” approach at GEHC, customer and supplier sites.

# Fair Competition

We do not cheat to compete.

## THE GEHC WAY

- We believe in a free and competitive marketplace. We comply with antitrust and competition laws in all our activities.
- We must never enter into improper agreements with other companies to fix prices or terms to be offered to customers, allocate markets or customers, or manipulate the bidding process.

## YOUR ROLE

- Do not propose or enter into any agreement or understanding with any competitor about any aspect of competition between GEHC and a competitor, including agreements on pricing, bidding, deal terms, wages or the allocation of markets or customers.
- Do not propose or enter into any agreement with any other party regarding whether or how to bid.
- Avoid contacts of any kind with competitors that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform legal/compliance.
- Understand and follow your business’s specific guidelines about contacts with competitors, obtaining and handling competitive information, and participating in trade and professional associations.

- Do not provide, receive or exchange any competitively sensitive information with a competitor or its representative, whether in person, electronically or at an industry meeting.
- Do not enter into discussions or agreements with other companies not to hire or solicit each other’s employees, and do not discuss wages or benefits with other companies who compete for the same talent pool.

## INTEGRITY IN ACTION

**Q:** I’m talking to a customer, and he is proposing to show me a competitor quote. What should I do? Can I discuss or accept copies of competitor quotes from the customer?

**A:** You need to politely decline the offer. Never accept documents marked as confidential or that you believe are confidential from a customer or any other source. If you do come into possession of a competitor’s confidential information, make sure to promptly contact legal/compliance, who will help you determine if disclosure to the owner of the information and/or others is needed. Remember that time sensitive reporting requirements can exist.



## POLICY SPOTLIGHT

**Be careful in all interactions with competitors to avoid even the perception of an improper agreement. Unspoken or implied agreements – simply the appearance of unfairness or deception – can give rise to reputational harm and legal liability, including significant fines and even jail time.**



## POLICY SPOTLIGHT

**Bribery concerns are not limited to government officials - many countries and companies also prohibit bribery in the private sector. Gifts, entertainment, or anything else of value provided in exchange for improper assistance or consideration could be viewed as a bribe.**

# Improper Payments Prevention

We do not engage in bribery or corruption of any kind.

## THE GEHC WAY

- GEHC prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.
- We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on GEHC's behalf in business dealings.
- We keep accurate books, records, and accounts that correctly reflect the true nature of all transactions.

## RED FLAGS TO REPORT TO LEGAL/COMPLIANCE

- Demands from a third party to receive its commission payment prior to winning a deal/contract
- Requests to make a payment to a person who is not related to the transaction being discussed
- Commissions that seem too large in relation to the services provided
- Ambiguous "consulting fees" on invoices

## YOUR ROLE

- Never offer, promise, make, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage. Consult the GEHC Lens Policy before providing a business courtesy to an external party.
- Follow your business due diligence procedures and require that any third party that (1) represents GEHC in promoting, marketing, and/or selling GEHC products to potential customers or (2) works with GEHC in the sale of GEHC products to potential customers, is carefully selected and complies with GEHC policy.
- Do not make facilitation payments to speed up routine administrative actions. The only exception is if it is necessary to protect the health or safety of you or another employee.



# Working with Governments

We follow the highest ethical standards in conducting business with governments.



## THE GEHC WAY

- We commit to comply with all contract terms and conditions, laws, and regulations applicable to GEHC when working with governments.
- We are truthful and accurate when dealing with governments.
- We maintain controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

## YOUR ROLE

- Government business is different — do not pursue government business without first engaging your business legal counsel.
- Be honest, complete and accurate when providing information to government entities.
- Review and understand requirements set forth by government customers before issuing proposals and/or accepting contracts.
- Do not help government customers to prepare bid specifications or to avoid procurement requirements.
- Do not deviate from government contract requirements, provide additional products/services, substitute the goods and services to be delivered, or provide customer concessions without written approval from the authorized government contracting official.

- Do not solicit or accept internal government information about its selection process or information about a competitor's proposal.
- Do not offer, promise, make or authorize the giving of anything of value to a government employee that is inconsistent with Corporate and business guidelines.
- Never enter into discussions with government employees or people close to them about prospective GEHC employment without the appropriate approval.
- In the U.S., certain employees must pre-approve personal political contributions for compliance with state and local “pay to play” laws. These employees are officers, directors, sales employees and their managers of GEHC businesses that seek U.S. state or local government contracts.

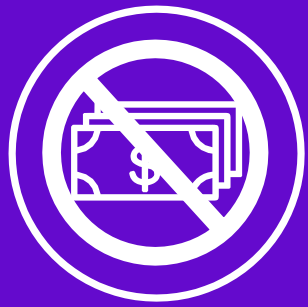
## INTEGRITY IN ACTION

**Q:** A U.S. government engineer I met on a prior job has offered to brief me on the specific criteria the government will use to evaluate proposals on an upcoming procurement. He says he wants to make sure we get a fair shot at the contract. Can I accept his offer?

**A:** Not without finding out if he has been expressly authorized by the contracting officer to give you this briefing. If the engineer tells you that he has been authorized by the contracting officer to brief you, make a written record of the conversation.

## POLICY SPOTLIGHT

**A government entity includes any federal, state or local government as well as any department, agency, or instrumentality thereof, such as a state-owned or state-controlled entity. This includes public international organizations (such as the UN and World Bank) and political parties.**



## POLICY SPOTLIGHT

**Money laundering can occur in any business relationship that involves the transfer or receipt of funds, including from customers, suppliers, distributors, counterparties, and agents.**

# Anti-Money Laundering

We keep GEHC safe from money-laundering activities.

## THE GEHC WAY

- We only conduct business with reputable customers who are involved in genuine business activities and whose funds come from legitimate sources.
- GEHC businesses have implemented appropriate controls to prevent, detect and respond to money-laundering risks.

## EXAMPLES OF MONEY LAUNDERING RED FLAGS

- Attempts by a customer to provide false information to open an account
- Offers to pay in cash or overpayments followed by requests for refunds
- Orders, purchases or payments that are unusual or inconsistent with a customer's trade or business
- Unusually complex deal structures
- Unusual fund transfers to or from countries unrelated to the transaction
- Transactions that might have been structured to evade recording or reporting requirements

## YOUR ROLE

- Understand and watch out for red flags in your business activities and engagements. Monitor for red flags throughout the lifetime of the party's relationship with GEHC.
- Follow Know Your Customer / Know Your Supplier policies to ensure all parties are screened against Watchlists and to receive timely due diligence.
- Take reasonable steps to understand and identify the party's beneficial owner, i.e. the individual with ultimate effective control over the legal entity.
- If handling incoming payments, understand who is making the payment, from where and why.
- Visit your business compliance portal to learn of any local business-specific AML requirements (e.g. suspicious activity reporting).

# International Trade Compliance

We comply with all export control, economic sanctions and customs.



## THE GEHC WAY

- We comply with global trade controls and economic sanctions that prohibit us from doing business with certain countries, entities, and individuals.
- We comply with applicable customs requirements for the importation and exportation of goods.
- We maintain policies regarding State Sponsors of Terrorism (SSTs) that require government authorization to proceed with a transaction.

## KEY TERMS

- **What is an import?** The movement of a physical item into one country from another country. All countries regulate the importation of goods and assess duties and taxes based on the value of the goods. Import and Customs requirements typically focus on physical items and not intangible transfers.
- **What is an export?** The movement of a physical item, software or technology from one country to another country. Many countries regulate exports based on the sensitivity of the items from a national security perspective. Exports can include emails, file transfers and conversations in addition to the shipment of goods.

## YOUR ROLE

### Customs

- Use only GEHC-approved Customs agents.
- Follow all business procedures relating to the import of goods.
- Provide accurate, complete and timely information to your business customs teams for import transactions including classifying goods.
- Ensure you fully comply with special program requirements before claiming reduced duty rates.

### Export Controls

- Use the export classification of goods, software and technology to determine if they require government authorization for export.
- Follow Know Your Customer / Know Your Supplier policies to ensure Watchlist screening.
- Ensure your export does not support prohibited end uses, such as nuclear proliferation and military end uses in certain countries.
- Do not do business with SSTs and/or sanctioned countries without approval.
- Do not cooperate with any boycott of Israel or any other restrictive trade practice.

## POLICY SPOTLIGHT

Request guidance from your business ITC leader or legal counsel if you are unsure how to proceed with your export/import transaction. Find them on [https://supportcentral.ge.com/products/sup\\_products.asp?prod\\_id=50063](https://supportcentral.ge.com/products/sup_products.asp?prod_id=50063).



## POLICY SPOTLIGHT

**If you observe any conformity defects or signs of deviations that could compromise the quality, safety, or regulatory requirements of GEHC products or services, halt the process and immediately notify your business Quality, Safety or compliance leaders.**

# Quality

We adhere to a range of quality standards and requirements for our products and services.

## THE GEHC WAY

- The quality of GEHC products and services is a key part of our reputation and the basis of our competitive strength.
- Quality at GEHC is everyone's responsibility. Proper quality:
  - Helps ensure the safety of our employees, customers, and those who our customers serve.
  - Helps drive customer satisfaction.
- GEHC complies with all laws and regulations pertaining to the quality, safety, and performance of our products in all countries where GEHC's products and services are offered.

## YOUR ROLE

- Follow your business policies, procedures, and manuals related to the quality, safety, and regulatory requirements of all products and services.
- Utilize only approved suppliers who meet, and consistently perform to, GEHC's quality and safety requirements.
- Strive for continuous quality improvement by utilizing customer feedback, production trends, and Lean concepts.

If you are involved with product or service design, manufacturing, distribution or servicing:

- Create and maintain accurate quality records, such as test results, inspection reports, and manufacturing operation sheets. Never manipulate or falsify documents to show inaccurate information.
- Do not bypass quality controls or take shortcuts that could compromise the quality, safety, or regulatory compliance of GEHC products and services.
- Do not misrepresent or falsify quality, safety or productivity metrics for internal or external reporting.

## INTEGRITY IN ACTION

**Q:** During a meeting to review quality standards for specific engineering requirements, an employee became aware of delays for certain quality reviews. Frustrated, the employee contacts the site leader responsible for these reviews. The employee demands the site leader to clear the reviews by the next day and indicates that no further delays would be accepted. Should the site leader be concerned with the tone of the email and the pressure to speed up quality reviews?

**A:** Yes, non-conformances must be reviewed for acceptability – these reviews cannot be skipped, despite the delays they may cause. Pressure from any employee to rush or circumvent required quality reviews is unacceptable. The site leader should escalate the behavior and raise an integrity concern as this is a potential policy violation.



# Reporting and Recordkeeping

We create, maintain and report accurate financial and business records.



## THE GEHC WAY

- We prepare timely, accurate and complete financial information for use in reports to management, investors, regulators and other stakeholders.
- We ensure that management decisions are based on sound financial analysis based on complete facts with appropriate consideration of short- and long-term risks.
- We comply with all Company policies and applicable laws and regulations relating to the preservation of documents and records.
- We maintain effective processes and internal controls that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.

## RED FLAGS TO REPORT

- Financial results that seem inconsistent with underlying performance
- Circumventing review and approval procedures
- Incomplete or misleading communications about the substance or reporting of a transaction

## YOUR ROLE

- Maintain effective processes and internal controls to fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- Protect GEHC’s physical, financial and intellectual property assets.
- Maintain complete, accurate and timely records to appropriately reflect all business transactions.
- Create documents that are accurate and complete, and follow company policies in deciding when to retain and dispose of them.
- Do not misrepresent financial results or non-financial metrics (metrics on which operating decisions are often based) to meet performance goals.
- Never engage in inappropriate transactions, including those that knowingly misrepresent the reporting of other parties such as customers or suppliers.
- Seek the advice of your Controllershship team, compliance or ombuds if you become aware of a questionable transaction.

## POLICY SPOTLIGHT

We faithfully reflect the economic and commercial substance of the Company’s business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.



## POLICY SPOTLIGHT

**All GEHC suppliers need to undergo due diligence before we can work with them. Only our Sourcing team has the authority to commit to supplier contracts.**

# Supplier Relationships

We base our relationships with suppliers on lawful and fair practices.

## THE GEHC WAY

- We use only those suppliers who share our commitment to integrity, are qualified to provide the goods and services for which they are selected and comply with all applicable laws, regulations and GEHC expectations.
- All GEHC suppliers are required to comply with the GEHC Integrity Guide for Suppliers, Contractors and Consultants (the “Supplier Integrity Guide”).
- We safeguard both GEHC and suppliers’ information, including confidential and proprietary information and personal data.
- We treat all suppliers with fairness and respect.

## RED FLAGS TO REPORT

- Unsafe conditions in supplier facilities
- Supplier employees who appear to be underage or subject to coercion
- Suppliers’ apparent disregard of environmental standards in supplier facilities
- Suppliers with no history of conducting business in the particular jurisdiction they would be engaged for
- Suppliers who do not have sufficient relevant experience

## YOUR ROLE

- Follow your business process for supplier competitive bidding and onboarding due diligence review.
- Report any issues or concerns you observe related to suppliers’ facilities, treatment of workers, sub-suppliers and business practices.
- Protect GEHC’s confidential and proprietary information including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a supplier provides to GEHC.
- Avoid potential conflicts of interest when you select a supplier, and never accept improper gifts or other items of value.

# Acceptable Use

We use GEHC Proprietary Information and GEHC Information Resources responsibly.

## THE GEHC WAY

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- We must use and protect information about our Company, our customers, our employees and our suppliers in an appropriate manner.
- Similarly, we must use and protect systems, devices, and other technology used to process GEHC Proprietary Information appropriately.

## WHAT ARE GEHC INFORMATION RESOURCES?

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- Any systems, devices, or other technology managed and approved by GEHC to process, store or transmit GEHC Proprietary Information,
- All equipment owned or leased by GEHC, including computers, mobile devices, and tablets, and
- Other equipment, such as personally owned mobile devices, that has been approved for GEHC business (i.e. those in the Bring Your Own Device (BYOD) program).

## YOUR ROLE

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- Store GEHC Proprietary Information only in GEHC Information Resources.
- Only use your GEHC identity (e.g., GEHC title or role, email address, credentials) where approved by policy and for GEHC business purposes.
- Return GEHC Information Resources when they are no longer required or have been replaced, and when you are leaving GEHC.

- Limit non-business use of GEHC Information Resources, internet access, mobile data plan and email to a reasonable duration/amount. Such use must not abuse Company time and/or resources; violate local law or any GEHC policies, standards or guidelines; or interfere with your work.
- Do not store, maintain, or back up GEHC Proprietary Information on personally owned or non-GEHC computers, mobile devices, removable media or cloud storage.
- Do not use equipment or technology banned by GEHC or a government entity.
- Do not use GEHC Information Resources for any unlawful purpose, such as accessing illegally distributed materials that are sexually explicit, or otherwise inappropriate.

## INTEGRITY IN ACTION

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**Q:** I am away from my GEHC laptop and need to get in contact with a colleague about a project we're working on. Can I email them from my personal email account?

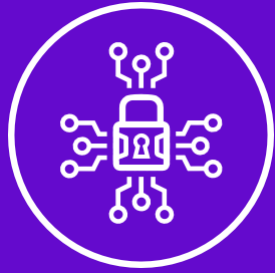
**A:** No, you may not use your personal email account to conduct GEHC business. This includes business-related communications with colleagues, customers or suppliers, as well as sending yourself any materials containing GEHC Proprietary Information. You must wait until you can regain access to your GEHC email.



## POLICY SPOTLIGHT

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**Raise any concerns about the appropriate use or protection of GEHC Proprietary Information or GEHC Information Resources at [src.health.ge.com](http://src.health.ge.com) or by contacting your manager, business Ombuds, Legal, Privacy, Information Security or Compliance Leader or other Open Reporting Channels.**



## POLICY SPOTLIGHT

**Only install trusted applications on GEHC Information Resources. Applications that are not provided or approved by GEHC should not be used with GEHC Confidential or GEHC Highly Confidential Information.**

# Cyber Security

We safeguard our systems, networks and devices from theft, loss or unauthorized access.

## THE GEHC WAY

- We seek to protect our networks, systems, devices, products, processes, services, and technology (GEHC Information Resources), and the extensive GEHC Proprietary Information they contain.
- We design GEHC Information Resources and products with security in mind and apply multiple layers of security controls.
- We monitor GEHC Information Resources in accordance with applicable law to protect the security of GEHC and GEHC Proprietary Information, to maintain GEHC operations, and to comply with applicable law and business obligations.
- We require third parties who process GEHC Proprietary Information on our behalf to implement information security controls that meet GEHC standards, and we assess those controls.

## TIPS FOR KEEPING RESOURCES SECURE

- Secure physical copies of GEHC Proprietary Information and GEHC devices when not in use
- Use strong passwords; don't share your password with anyone
- Avoid connecting to public or unsecure Wi-Fi networks
- Avoid clicking on email links or opening attachments from unknown senders
- When posting information online, do not disclose GEHC trade secrets, proprietary or other commercially sensitive information

## YOUR ROLE

- Use only the GEHC Information Resources for which you have authorization.
- Do not use personal email, unapproved devices or unapproved software to conduct GEHC business.
- Understand the terms of use for GEHC's collaboration applications, including how the applications should be used and the data types that are allowed in each application.
- Ensure GEHC Proprietary Information shared with a third party is transmitted using an approved, secure method and appropriately protected by the third party.



# Intellectual Property

We secure GEHC Intellectual Property rights to maintain our competitive advantage.

## THE GEHC WAY

- We will defend our intellectual property (IP) rights from unauthorized use to preserve the value of our innovation and brand.
- We respect the valid IP of others and take appropriate steps to avoid violating any third-party rights.

## WHAT EXACTLY IS IP?

- IP includes inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, and product shapes. We protect this proprietary information with patents, trade secrets, trademarks, copyrights and designs.

## YOUR ROLE

- Disclose any novel inventions created as part of your employment in a timely manner working with your business IP counsel.
- Classify, label, store and share all GEHC data, information and documents in accordance with GEHC’s Proprietary Information Classification, Labeling and Handling Policy, and ensure that access to GEHC’s proprietary information and documents is granted only to individuals with a legitimate need.
- Do not provide GEHC’s proprietary information to a third party without the proper internal approval and the necessary confidentiality agreement with the third party.

- Only use or distribute GEHC’s proprietary information for the benefit of GEHC, and not for personal gain.
- Do not take, access, provide access to, or use any of GEHC’s proprietary information or other IP without authorization after leaving GEHC.
- Do not bring, access, keep, share or use a third party’s proprietary information, including proprietary information from a previous employer, without first consulting with and receiving prior approval from your business IP counsel.

## INTEGRITY IN ACTION

**Q:** I need to send proprietary information to other GEHC employees but am unsure if it requires a label. How do I know if information is at least -CONFIDENTIAL-?

**A:** Ask yourself, do I care if this information gets into the wrong hands? To put it another way, if this information was improperly disclosed, would there be a risk of harm to GEHC’s reputation or business? If you answer “yes” to these questions, then the information is at least -CONFIDENTIAL- information. If you have a question, ask your manager and/or your business IP counsel.



## POLICY SPOTLIGHT

**GEHC owns the IP created by its employees as part of their employment. We require employees to review and sign GEHC’s Employee Innovation and Proprietary Information Agreement (EIPIA).**



## POLICY SPOTLIGHT

**Report any known or suspected risks or incidents involving Personal Information immediately at <https://src.heath.ge.com> or to your manager, Business Privacy Leader, or through Open Reporting**

# Privacy

We respect individual privacy rights.

## THE GEHC WAY

- We collect, handle and protect Personal Information responsibly. We do this in compliance with applicable privacy laws.
- We process Personal Information lawfully, fairly and transparently, and provide for individual rights, consistent with applicable law.
- We limit processing of Personal Information to the minimum required to meet its specific legitimate business purposes.

## WHAT EXACTLY IS PERSONAL INFORMATION?

- Personal Information is any information relating to a directly or indirectly identifiable person. Examples of Personal Information include name, GEHC SSO, home address, national identifier, and pay and benefits information.

## YOUR ROLE

- Limit your access to or processing of Personal Information only to what is necessary for specific legitimate business purposes.
- Keep Personal Information only as long as necessary. Follow applicable retention schedules and secure deletion procedures provided by your business and/or function.
- Consider privacy early in the design of any system, application, process or product.
- Protect Personal Information processed by suppliers by implementing appropriate contracts, security assessments, Privacy by Design, and secure transmission with those suppliers.

## INTEGRITY IN ACTION

**Q:** We received permission to use this customer personal information as part of our research, can we use it for marketing as well?

**A:** No. Personal Information authorized for one purpose cannot be used for a new, incompatible purpose.

# Conflicts of Interest

We avoid conflicts of interest.

## THE GEHC WAY

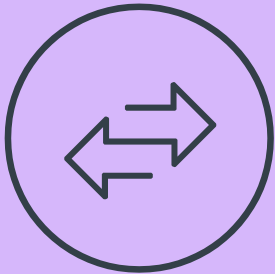
- Always make GEHC business decisions based on what is objectively best for GEHC, never what is personally best for you.
- Do not personally take for yourself any opportunities that GEHC could have an interest in that are discovered using GEHC position(s), information or property.
- Do not use GEHC resources, intellectual property, time or facilities for personal gain.
- Make sure to avoid any actual, potential or perceived conflict of interest with GEHC. When avoidance is not possible, or if you are unsure, you have a duty to disclose.

## EXAMPLES OF POTENTIAL CONFLICTS TO DISCLOSE

- Financial interests in a company where you could personally affect, or financially benefit from, GEHC’s business with that company
- Working with, hiring or supervising others with whom you share a close personal relationship
- Outside employment (paid or unpaid)
- Outside board memberships
- Gifts from suppliers

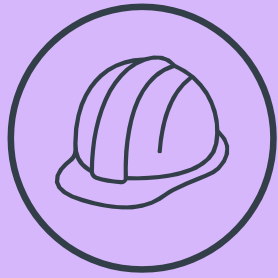
## YOUR ROLE

- Disclose actual, potential or perceived conflicts of interest electronically using the Conflicts of Interest questionnaire when you join GEHC and update it when requested.
- Update your questionnaire before entering into any situation that poses a potential or perceived conflict.
- If you work in a country where an approved alternative method for disclosing potential conflicts is in place, then you may submit a disclosure in writing to (i) your manager and (ii) HR manager or business legal counsel or compliance leader.



## POLICY SPOTLIGHT

**An affirmative disclosure does not necessarily mean that there is an actual conflict or that the activity is improper. It is important to fully disclose so GEHC can help you avoid any situations that may violate the GEHC’s Conflicts of Interest Policy.**



## POLICY SPOTLIGHT

**Stop work and alert management or EHS leadership if you are aware of unaddressed hazards or standards that are not being followed.**

# Environment, Health and Safety

We protect our people and the communities in which we operate.

## THE GEHC WAY

- We strictly comply with all the environment, health, and safety (EHS) laws that apply to our operations.
- We develop and follow safe work practices to ensure workplace safety and prevent injuries.
- We install, maintain, and monitor environmental controls to ensure our emissions meet legal limits.
- We assess the EHS risks of any new activity – whether designing a new product, selling in a new market, building a new factory, or buying a new business – and prepare our teams and sites accordingly.

## YOUR ROLE

- Understand and comply with all EHS training assigned to you.
- Follow GEHC EHS processes and procedures to find and fix EHS concerns at your site. When in doubt, ask your EHS leader.
- Question unsafe or improper operations you observe anywhere you work, including at GEHC facilities, customer and project sites.
- Stop any work which seems improper, unsafe, or about which you are uncertain.

## EXAMPLES OF EHS RED FLAGS TO REPORT

- Failure to obtain or comply with regulatory permits
- Deviations from written work practices that bypass or remove EHS defenses or compromise safety
- Lapses in security or emergency preparedness
- Inadequately maintained tools or equipment
- Lack of or faulty protective equipment, including machine guards or personal gear
- Unsafe driving
- Failure to use lock-out/tag-out (LOTO) procedures or fall protection
- Improperly shipped wastes or hazardous products
- Unsafe offsite situations, such as at customer or project sites



# Insider Trading and Stock Tipping

We ensure proper use and protect the confidentiality of material non-public information.

## THE GEHC WAY

- We do not use or share material non-public information for any personal benefit.

## EXAMPLES OF MATERIAL INFORMATION

- Revenue, earnings, margin, cash flow or other financial results or forecasts
- Significant lawsuits, claims, or investigations
- Changes in senior leadership
- Large, transformative acquisitions, dispositions, or reorganizations
- Audit results
- Key drivers of business performance

## YOUR ROLE

- Never buy or sell securities (such as stocks, bonds or derivatives) of GEHC or any other company, while you are aware of non-public information that could affect the price of those securities (insider trading).
- Do not recommend or suggest that anyone else buy or sell the securities of any company — including GEHC — while you have material non-public information about that company (stock tipping).

- Avoid sharing non-public information with anyone outside GEHC unless it is necessary for GEHC’s business activities and proper controls are in place (such as a non-disclosure agreement with a supplier).
- Refrain from discussing non-public GEHC business with family and friends.
- Do not serve as an independent consultant or expert outside of GEHC on business matters within the scope of your GEHC employment.

## INTEGRITY IN ACTION

**Q:** During a team meeting, I learned that GEHC is planning to acquire another company. Can I buy stock in that company before the acquisition is announced? What about buying GEHC stock?

**A:** No and no. If you learn that GEHC is considering buying a company or entering into a major purchase contract, assume the information is non-public until after GEHC or the counterparty has publicly announced the transaction and the market has had time to absorb the information.



## POLICY SPOTLIGHT

**GEHC policy establishes standards for employees and others who obtain material nonpublic information and prohibits insider trading and stock tipping.**



## POLICY SPOTLIGHT

**If you see or sense that something is not right, say something. You can report security concerns or suspicious events to a security leader, HR, legal/compliance, ombudsperson, or at [srcm.gehealthcare.net](https://srcm.gehealthcare.net).**

# Security

We work to keep our global operations safe and secure for those working for us and with us.

## THE GEHC WAY

- We want all employees and contractors to feel physically safe and secure while on the job – whether at a GEHC work location or when traveling on behalf of the Company.
- We communicate as appropriate about prevention, emergency response and business continuity with the GEHC community, government officials, the media and the public.
- Our 24/7 global security operation teams are prepared to assist with all security concerns that you may have.

## TOOL FOR TRAVELING SECURELY: YOUR EMERGENCY CONTACT

- Before traveling, we recommend you enter or update the emergency contact information in your GEHC travel profile. If there is any type of event (natural or man-made) that could cause a risk to you while traveling, GEHC leadership wants to check that you are safe. If we cannot get in touch with you, we will reach out to your emergency contact while we continue to monitor your safety.

## YOUR ROLE

- Create and maintain a safe working environment.
- Always be aware of your surroundings whether you are in a GEHC location, a customer site or a public place.
- Adhere to all entry/exit procedures. Wear your badge and ensure others do too.
- Make business travel arrangements through GEHC Travel and comply with the GEHC T&L Policy requirements.
- If hosting or coordinating a GEHC event, help make it safe by completing the GEHC Event Tool at [srcm.gehealthcare.net](https://srcm.gehealthcare.net).

## INTEGRITY IN ACTION

**Q:** I saw a contractor taking pictures while in the GEHC area. She may have permission, but I am not sure. What is the best thing to do?

**A:** Immediately contact a local security guard or a site security leader to report what you saw. In most sites, picture taking is not allowed or must be carefully supervised with permission.

# Open Reporting

We act as the voice of integrity.

## THE GEHC WAY

- GEHC promotes an open environment in which employees are encouraged to raise integrity concerns through a variety of channels and are comfortable doing so without fear of retaliation.
- GEHC strictly prohibits retaliation for raising a concern or participating in an integrity investigation.
- GEHC keeps concerns and related parties strictly confidential, to the extent possible consistent with a full and fair investigation. Investigators will release details only on a “need to know” basis.

## HOW TO RAISE AN INTEGRITY CONCERN

You can choose to speak to someone about a potential integrity issue in person, by phone or in writing.

**Available channels include:**

- Managers
- Human Resources
- Legal & Compliance
- Ombuds
- Internal Audit
- The GEHC Board of Directors
- Anonymously at [gehealthcare.ethicspoint.com](https://gehealthcare.ethicspoint.com)

Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities.

## HOW CONCERNS ARE INVESTIGATED

GEHC thoroughly examines every integrity concern. During the investigation process, GEHC:

- Forms an independent and objective investigation team.
- Obtains the facts through interviews and/or the review of documents.
- Reaches conclusions, whenever possible, from the facts the team is able to obtain.
- Recommends corrective action, if necessary.
- Provides the person who raised the original concern (if that person is known) with feedback on the outcome, while maintaining the confidentiality and privacy of all involved in the matter



## POLICY SPOTLIGHT

**You do not need to be certain that a violation has occurred, but rather should raise a concern when you have a good faith belief that something improper, a violation of law or policy, has occurred.**

