



Fisher & Paykel Healthcare

GLOBAL SPEAK UP PROCEDURE

AIM

At Fisher & Paykel Healthcare (“F&P”) we are committed to conducting our business with integrity and in a legal and ethical manner.

We promote an open, honest and transparent work environment and believe that unethical and illegal conduct should be reported.

F&P provides different options for people to “Speak Up” about conduct they believe breaches F&P’s Code of Conduct or if they have observed behaviour that they believe is unsafe, unethical or illegal.



SCOPE

This Global Speak Up Procedure outlines what it means to Speak Up about improper conduct within or by F&P. It applies to all directors, executives, employees, people seconded to F&P, volunteers and contractors of F&P, globally. It may also apply to other groups of people on a country by country basis. Please see the local Speak Up Procedure relevant to your country for more information.

Each country’s local Speak Up Procedure contains information about specific reporting procedures, including, for example, how to make a “protected disclosure”. Where a country has specific laws, regulations or requirements related to Speaking Up or whistleblowing generally, the local Procedure will take these into account.

If there are any inconsistencies between the local Procedure and this Global Speak Up Procedure and/or your local HR processes, the local Procedure will apply.

We are all responsible for ensuring that we Speak Up about any actions or circumstances that breach F&P’s Code of Conduct or other policies, as well as any conduct that is dishonest, unethical or illegal. If you see something that you believe could be a breach (even if you only suspect it might be), you should report it at the earliest opportunity.

The exact scope of what is reportable and/or receives protection under this Global Speak Up Procedure may be country specific. Refer to your country’s local Speak Up Procedure for further information.

This Global Speak Up Procedure does not apply to the disclosure of information regarding personal work-related grievances, except if the information concerns allegations of victimisation relating to a Speak Up disclosure you have made. Personal work-related grievances are generally grievances about any matter in relation to your employment, or former employment, that have implications for you personally. If you have a personal work-related grievance, you should report this to your HR representative.

Examples of conduct that should be reported include
(but are not limited to):

- any dishonest activity, including soliciting, accepting or offering a bribe;
- illegal activity (such as theft, selling or using drugs, violence, damaging property or other breaches of law);
- conduct contrary to F&P’s policies;
- undisclosed conflicts of interest;
- accounting irregularities;
- conduct that is or may be a serious risk to the health and safety of people or the environment;
- misuse of company resources;
- conduct that could lead to financial or reputational harm to F&P;
- coercion or vilification;
- concealment of improper conduct; or
- other serious wrongdoing.

PRINCIPLES

Investigation process

The investigation process is outlined further in the Speak Up Procedure relevant to your country.

No retaliation

F&P is committed to protecting people who Speak Up about improper conduct. If you report any improper conduct under this Procedure in good faith, F&P will take all reasonable steps to prevent retaliation or reprisal against you and anyone else.

Confidentiality

If you Speak Up about improper conduct, it will be treated seriously and with the appropriate level of confidentiality. Confidentiality of reports will be maintained wherever possible.

Fairness to persons being investigated

F&P recognises that if someone makes an allegation that you have participated in improper conduct, you are entitled to be treated fairly and will be provided an opportunity to respond to any allegations against you prior to any final findings being made. Disciplinary action may be taken against anyone found to have reported under this Procedure without reasonable grounds, including where the allegations are malicious or unfounded.



RESPONSIBILITIES



- **Familiarising themselves with this Global Speak Up Procedure** and the relevant local Speak Up Procedure.
- **Following the Global Speak Up Procedure and local Speak Up Procedure** if they decide to make a disclosure.
- **Disclosing information**, if they are aware of any improper conduct, at the earliest opportunity.



- **Familiarising themselves with this Global Speak Up Procedure and the relevant local Speak Up Procedure**, to ensure that if an employee contacts them, they can advise the employee on what to do.



- **Familiarising themselves with the Global Speak Up Procedure and the relevant local Speak Up Procedure**, to ensure that if an employee contacts them, they can advise the employee on what to do.
- **Supporting an employee through the Speak Up Process** where appropriate.



- **Helping employees to be aware of and understand the Global Speak Up Procedure and the relevant local Speak Up Procedure** by assisting with onboarding, education, disseminating information and providing periodic meeting updates as needed.



- **Maintaining and periodically reviewing the Global Speak Up Procedure and each country's Speak Up Procedure.** The **Global Speak Up Procedure** can only be revised following the approval of the appropriate Board committee.



- **Registering any issue** referred to them for investigation.
- **Reviewing the matter** and deciding on the next course of action.
- **Instigating an investigation**, where appropriate.
- **Commencing an external investigation** where appropriate.
- **Communicating with employees** who have raised a matter.
- **Authorising any amendments** to this Procedure and a country's Speak Up Procedure.
- **Maintaining a register of all matters raised through this Global Speak Up Procedure** and for referring all matters of a serious nature to the relevant Board committee for external scrutiny.

This Global Speak Up Procedure and the relevant local Speak Up Procedure are available on the intranet or from your HR representative.

