



ResMed Global Third Party Code of Conduct



Our Commitment

ResMed Inc. (“ResMed”) and its subsidiaries are dedicated to conducting its business with the highest standards of business ethics. We have an obligation to be honest, fair and forthright in all of our business activities. Our Global Third Party Code of Conduct (“Code”) sets forth ResMed’s expectations for distributors, business partners, suppliers, advisors and other third parties registering, promoting, selling, and marketing ResMed products and services or otherwise interacting with Government Officials, Health Care Professionals or others to or for ResMed (“Third Parties”).

Ethics and Compliance is the foundation of every facet of our business activities, and ResMed requires its Third Parties to make a commitment to the highest standards of ethics, integrity, and compliance. Third parties are responsible for the compliance of their subcontractors with respect to this Code as well.



Respecting the Rights of Others and our Environment



Labour and Human Rights

Third Parties must ensure that all workers are treated with dignity and respect including:

- Not engaging in the use of child labour as defined by international and national laws, whichever standard is higher.
- Complying with local and national laws and regulations pertaining to wages, overtime, benefits, and any other work-related conditions.
- Ensuring that working hours comply with national laws.
- Respecting the right of employees to freedom of association, freedom of expression, the right to be heard.

Third Parties must not carry out any practices that constitute modern slavery, which includes but is not limited to:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- child labour

Third Parties should take reasonable steps to reduce the risks of modern slavery in its business and supply chains.

Privacy

Third Parties have an ethical and legal obligation to protect personal information (including, but not limited to, patient information) by:

- Complying with all applicable privacy and data security laws, and immediately notify ResMed if there is any conflict of laws.
- Taking appropriate steps to safeguard any personal information received from ResMed against unauthorized or unlawful use, disclosure, access, loss, alteration, damage and destruction. This includes the encryption or anonymization of any health data that is transmitted externally.
- Immediately reporting to ResMed any public disclosure of personal information, or any attempt by an outsider to “hack” or steal personal information.

Respecting the Rights of Others and our Environment

Environmental Impacts

Third Parties must comply with national and local legal obligations to manage the impact of their business on the environment. Third parties working with us must work to continuously reduce their environmental impact by:

- Complying with applicable environmental laws and regulations.
- Implementing a system to manage and reduce environmental impacts.
- Obtaining all required environmental permits and licenses.

Harassment, Discrimination and Bullying

Third Parties must maintain a work environment free from harassment, discrimination, and bullying:

- Any form of Harassment and/or Discrimination are unacceptable. Any Harassment and/or Discrimination on the basis of race, color, religion, age, gender, national origin, marital status, sexual orientation, disability or other legally protected status will not be tolerated.
- Workers must not be threatened with, or subjected to harsh or inhumane treatment, including, but not limited to verbal abuse, harassment, mental and/or physical coercion, or sexual harassment.
- Workplace bullying is likewise unacceptable. Bullying is defined as a pattern of offensive conduct (including electronically transmitted acts – i.e., cyberbullying, using social media, internet, mobile phone, etc.) that targets individual(s) and threatens, humiliates, or intimidates. It can cause a reasonable person in the victim's position substantial emotional distress and undermine his/ her/their ability to work.



Health and Safety

Third Parties must provide a safe, hygienic and secure work environment to prevent accidents and injury. A safe and secure work environment also means a workplace safe from illegal drugs and violence.

- Workers must have access to clean and safe accommodations, toilet facilities, potable water and food storage facilities.
- Health and safety policies and regular training must be provided, implemented and recorded.

Acting with Integrity

Anti-Bribery and Corruption

Third Parties must act in compliance with laws, regulations and industry standards applicable to the countries where they conduct business inside the United States such as the U.S. Foreign Corrupt Practices Act and where they conduct business outside of the United States such as, U.K. Anti-Bribery Act, or the Brazilian Anti-Bribery Law.

- Third Parties must ensure that their employees, affiliates and agents do not offer or pay money or anything of value to any government official or political candidate for the purpose of obtaining, retaining or directing business to any person or entity, as prohibited by applicable local and international laws, which may include the U.S. Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act, and the Brazilian Anti-Bribery Law.

Interactions with Health Care Professionals

Third Parties are prohibited from offering or promising anything of value to a Health Care Professional as a reward or incentive for past, present, or future purchases, uses, or recommendations of ResMed or our Third Party's products, or any other improper business advantage for ResMed or a Third Party.

- Third Parties should not use any inappropriate inducement, payment, or personal benefit to encourage a Health Care Professional to recommend, prescribe, purchase, supply, sell or administer ResMed or our Third Party's products.



Interactions with Non-Health Care Professional Foreign Officials

Third Parties must not engage in bribery or corrupt conduct with Non-Health Care Professional Foreign Officials in any form by:

- Offering, promising, or authorizing anything of value such as gifts, services, or entertainment to government personnel or other officials, either directly or indirectly for the purpose of improperly obtaining or retaining business, influencing the performance of official duties, or any other improper purpose or business advantage.
- Offering an improper payment to or receiving an improper payment from other third parties as defined under this Code.

Acting with Integrity

Compliance with Laws and Regulations

ResMed is committed to ensuring the manufacture, development and supply of innovative products and services that are of the highest quality and comply with the applicable regulatory requirements of each of the regions in which they are supplied.

- Third Parties supplying Product(s) acquired (directly or indirectly) from ResMed are required to comply with all applicable laws, rules, regulations and treaties related to the use, commercialization and/or supply of those product(s), including in particular quality, registration and regulatory requirements applicable in the regions/locations in which they supply those product(s).
- Third Parties commit to ensure that their customers comply with all applicable laws, rules, regulations and treaties related to the use, commercialization and/or supply of product(s) acquired (directly or indirectly) from ResMed, including quality, registration and regulatory requirements applicable in the regions/locations in which those product(s) are supplied.

Fair Competition

Third Parties must follow all applicable antitrust and competition laws by:

- Never engaging in unfair business practices and never sharing confidential information such as bids, proposals or strategies with competitors.
- Never discussing, coordinating, or agreeing with competitors to fix prices or engage in business practices which are construed by Anti-Trust Authorities as having the purpose or effect of diminishing free competition.
- Never taking part in discussions or arrangements that may be perceived as anti-competitive.

Confidentiality

Third Parties must keep ResMed's non-public information confidential.

- ResMed's confidential information that must be protected includes, but is not limited to, non-public information that might be of use to competitors, or would be harmful to ResMed if disclosed.
- ResMed's confidential information should never be disclosed unless authorized in writing by ResMed or legally required. In the event that a Third Party is required by law to disclose ResMed's confidential information, that Third Party must provide immediate notice to ResMed of the disclosure, and, if possible, provide ResMed with an opportunity to oppose such disclosure.
- Any authorized disclosure of ResMed's confidential information should be subject to a confidentiality agreement requiring the other party to keep the information confidential once disclosed.

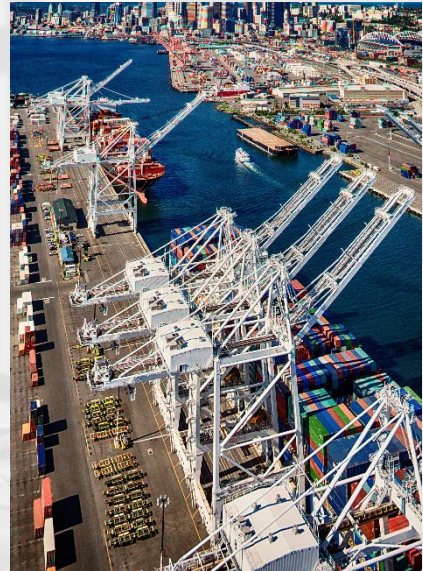
Conflicts of Interest

Third Parties must be free of conflicts of interest that jeopardize their ability to take actions in the best interest of ResMed. A "conflict of interest" occurs whenever a Third Party's judgment and loyalty are divided between its responsibilities to ResMed and to an outside interest, or when a Third Party employee conducts a business activity for his or her personal benefit or the benefit of a family member or friend. ResMed expects Third Parties to immediately disclose any actual or potential conflicts of interest to ResMed to ensure fair and prompt resolution.

Sanctions and International Trade

Third Parties must comply with all applicable sanctions and international trade laws and regulations with regard to imports, exports, and international financial transactions.

- Third Parties must not contract with vendors in any embargoed and sanctioned countries.
- If Third Parties' products are subject to the U.S. Export Administration Regulations, then they must ensure the product has been screened against the Commerce and Treasury Department's lists before exports are provided to that end-user.
- Third Parties that supply goods to ResMed must comply with conflict minerals legislation associated with sourcing tin, tantalum, tungsten and gold from the Democratic Republic of the Congo and adjoining countries, including but not limited to the Dodd-Frank Wall Street Reform and Consumer Protection Act. Third Parties must provide reasonable assistance to ResMed and respond to all requests relating to compliance with conflict minerals legislation.
- Third Parties must comply with modern slavery legislation including but not limited to the California Transparency in Supply Chains Act of 2010, the United Kingdom's Modern Slavery Act 2015, and Australia's Modern Slavery Act 2018 (together the "Slavery Acts"). Third Parties must provide reasonable assistance to ResMed and respond to all requests relating to compliance with modern slavery legislation.
- Third Parties must not use slavery or human trafficking in any of their supply chains, or in any part of their own business.



Reporting Violations of the Code

Reporting

All Third Parties have a duty to report any known or suspected violation of this Code to ResMed.

Third Parties are encouraged to make a report, including concerns of actual or potential misconduct, through our Ethics Hotline, which is managed by an independent third party. The Hotline is accessible 24 hours a day, seven days a week, with translators available when necessary. Where allowed by local law, you may choose to make an anonymous report through the [EthicsPoint Hotline](#).

We encourage Third Parties to make available the ResMed Global Third Party Code of Conduct and details of the Ethics Hotline within its business and supply chains to promote reporting actual or potential misconduct.



Reporting Violations of the Code

Third Parties can use the country specific telephone numbers below to report an issue. A complete list of all available country specific Hotline numbers can also be viewed on the ResMed's EthicsPoint Reporting Webpage at www.resmed.ethicspoint.com.

Country	Phone #	Access Code (if applicable)
Australia	1800-757-139	N/A
Belgium	800-620-6934	0-800-100-10
Brazil	800-620-6934	0-800-888-8288
Brazil	800-620-6934	0-800-890-0288
China	400-9-901-443	N/A
Colombia	800-620-6934	01-800-911-0010
Colombia	800-620-6934	01-800-911-0011 (Spanish)
Czech Republic	800-142-256	N/A
Denmark	800-620-6934	800-100-10
France	0805-54-24-96	N/A
Germany	0800-7243503	N/A
India	800-620-6934	000-117
Italy	800-620-6934	800-172-444
Korea	800-620-6934	00-309-11 (Dacom)
Korea	800-620-6934	00-729-11 (Korea Telecom)
Korea	800-620-6934	00-369-11 (ONSE)
Korea	800-620-6934	550-2USA (US Military Base-Dacom)
Korea	800-620-6934	550-HOME (US Military Bases-Korea Telecom)
Malaysia	1800-88-9815	N/A
Poland	800-620-6934	0-0-800-111-1111
Singapore	1800-622-7250	N/A
United States	800-620-6934	N/A
United States	470-219-7126	N/A