



The Spirit & The Letter

Code of Ethics & Integrity

Message from the Audit Committee

As the Audit Committee of GE HealthCare's Board of Directors, we work to serve the long-term interests of GE HealthCare stockholders and responsibly address the interests of other stakeholders. We expect all GE HealthCare directors, officers and colleagues to act ethically at all times and to adhere to *The Spirit & The Letter*, the Company's Code of Ethics & Integrity.

We are committed to the Company's success and have confidence in GE HealthCare's compliance program to guide us on how to do the right things for our people, patients and customers, using the tools and insights in *The Spirit & The Letter* for ethical decision-making and operating with the highest integrity.



Catherine Lesjak
Chair



Rodney F. Hochman



Lloyd W. Howell, Jr.



Anne T. Madden



William J. Stromberg

Message from Peter Arduini

We began our journey as an independent company in January 2023 with a purpose: to create a world where healthcare has no limits. Together we are building a patient-focused organization rooted in a proud history of delivering innovative solutions to advance healthcare.

From the start, we established our [Cultural Operating Principles](#) to help us transform and work together in new ways as we deliver on our priorities for our people, patients and customers.

Now, we are proud to publish *The Spirit & The Letter* as our refreshed Code of Ethics & Integrity. *The Spirit & The Letter* embodies our commitment to maintaining trust among our stakeholders and each other, and provides a framework to guide our actions and decision-making. The essential message is simple: we always act with the highest integrity. We do not tolerate illegal or unethical behavior.

I encourage you to discuss questions about interpreting or complying with *The Spirit & The Letter* with your People Leader or members of the Compliance team.

When lives are at stake, patients and customers want confidence in a company they trust. I am proud of the GE HealthCare team and all that we've accomplished over the last century by doing things the right way. With integrity as our foundation, together we will create a world where healthcare has no limits.



Peter Arduini
President & CEO, GE HealthCare





Always with the highest integrity

Our Cultural Operating Principles



Serve our people, patients, & customers

We are focused and passionate about making a difference.

Everyone we interact with, from patients to providers, from colleagues to customers, deserves our best. We listen with open minds, breaking down barriers to transform today's personal challenges into tomorrow's breakthrough solutions.



Lead with a lean mindset

We make things better every day.

Lean is how we execute our strategy, align our priorities and run our business. We simplify the complex, eliminate waste and solve problems with speed and agility. We are dedicated to safety and quality as we deliver on our commitments to patients, customers and shareholders.



Empower entrepreneurial spirit

We're all owners here, and we act with speed.

We feel personally accountable for solving problems and delivering solutions. We make decisions and take action. We learn, adapt, and overcome obstacles and uncertainty — never losing sight of what matters most.



Deliver the future of healthcare

We dream big to deliver the future of healthcare.

We find new ways to deliver value for our people, patients and customers through a growth mindset and continuous learning. We embrace creativity, act boldly and unlock new possibilities.



Win together and have fun

We make a difference as one inclusive team.

We are passionate about our purpose. We care for, trust, and value the unique contributions of one another. We empower, inspire, and grow high-performing diverse teams that have fun and deliver on our potential.

Always with the highest integrity



Table of contents

Our program

The Spirit

- 8 Who does this code apply to?
- 9 What is expected of me?
- 10 What are the additional expectations of People Leaders?
- 11 Where can I raise a concern?
- 12 How do we handle concerns?

Our policies

The Letter

- 14 We care about safety first
 - 15 Environmental, Health, Safety & Sustainability
 - 16 Human Rights
 - 17 Quality & Regulatory Standards
 - 18 Respectful Workplace
 - 19 Security & Crisis Management
- 20 We respect our stakeholders
 - 21 Healthcare Professionals & Healthcare Institutions
 - 22 Improper Payments Prevention
 - 23 Indirect Third Parties
 - 24 Patients & Patient Organizations
 - 25 Working with Governments
 - 26 Supplier Relationships
- 27 We do what's right
 - 28 Anti-Money Laundering
 - 29 Conflicts of Interest
 - 30 Culture and Belonging
 - 31 Enterprise Risk Management
 - 32 Environmental, Social & Governance
 - 33 Fair Competition
 - 34 Insider Trading & Stock Tipping
 - 35 International Trade Compliance
 - 36 Reporting & Recordkeeping
 - 37 Research & Product Development
- 38 We safeguard sensitive data
 - 39 Acceptable Use
 - 40 Cyber Security
 - 41 Intellectual Property
 - 42 Privacy



The Spirit

The Spirit embodies our promise to act ethically at all times, to do the right thing for our people, patients and customers, and to always conduct business with the highest integrity.

Who does this code apply to?

Everyone who works for or with GE HealthCare has a duty to understand and comply with applicable laws, regulations and Company policies, including this Code.

This includes:

- + GE HealthCare directors, officers and colleagues
- + Subsidiaries
- + Controlled affiliates
- + Entities in which GE HealthCare owns more than 50 percent of voting rights or otherwise has the right to control
- + Third parties who represent or do business with GE HealthCare including consultants, agents, sales representatives, distributors and independent contractors

Additional requirements that apply to certain third parties appear in the [GE HealthCare Integrity Guide for Suppliers, Contractors & Consultants](#).

Colleagues working with non-controlled affiliates should encourage them to adopt and follow GE HealthCare compliance policies.

The Spirit & The Letter and the policies in it are not an employment contract, and do not create any express or implied contractual rights.



What is expected of me?



Be knowledgeable

- Gain an understanding of *The Spirit & The Letter* policies.
- Practice the cultural and policy expectations contained in *The Spirit & The Letter*.
- Follow links to policies that apply to your role. Learn and apply relevant global and business-specific policies.



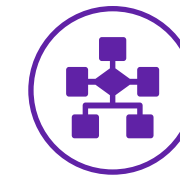
Be aware

- Consider how your actions and decisions might appear if they were reported in the media.
- Make decisions that reinforce our reputation for integrity.
- Proactively ask your People Leader or Compliance about developments that affect your role.
- Understand that GE HealthCare may review, audit, monitor, intercept, access and disclose information processed or stored on Company equipment and technology, or on personally owned devices that access GE HealthCare networks or systems.



Be committed

- Act with the highest integrity at all times and encourage colleagues to do the same.
- Promptly raise concerns about possible violations of law or Company policy.
- Ask questions if you are unsure about these expectations or what to do.



Make every business decision with this Code and our values in mind. Apply this framework:

- 1. Stop and reflect:** What is the purpose of your task, deliverable or interaction? Is it aligned with the Company strategy? Does it support a legitimate business need? Have you considered the external perception of our actions to our people, patients, customers, the public and the government?
- 2. Review facts:** Does this activity align with the law and our policies? What policies guide this activity? Do you know how to apply the policies? Is preapproval required for this activity, and if so, do you know the process? Have you asked for help from your People Leader or Compliance if you are unsure?
- 3. Align and ask:** When you have doubt about how to apply our policies, discuss with your People Leader or contact Compliance for help.

What are the additional expectations of People Leaders?

People Leaders are expected to foster a culture of compliance. Our leaders are responsible to prevent, detect and respond to compliance concerns.



Prevent

- Model integrity and incentivize compliance through your words and actions.
- Never compromise integrity to meet deadlines, satisfy customers or increase revenue.
- Discuss ethics, integrity and compliance with your team during regular meetings.
- Help your team understand how and where to seek additional guidance and ask questions.
- Ensure your team completes assigned compliance training in a timely manner.



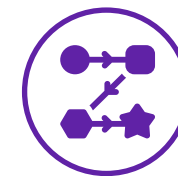
Detect

- Help your team recognize red flags for key risks.
- Use control measures to detect risks and potential violations.
- Be a resource for your team to approach you with concerns. People Leaders are the most direct path for colleagues to raise integrity concerns. See the [Leader's Guide to Integrity](#) for more information.



Respond

- Recognize acts of integrity in evaluations and through recognition and reward programs.
- Use appropriate channels to document and escalate concerns raised to you.
- Take prompt corrective action to address identified compliance weaknesses and take appropriate disciplinary action.



Follow four steps when a colleague brings an integrity concern to your attention:

- **Engage:** ensure privacy; listen carefully; take the concern seriously.
- **Evaluate:** assess whether a possible violation of law or GE HealthCare policy is involved and get help from HR or Compliance if in doubt.
- **Escalate:** submit the concern on behalf of the employee to the Ombuds team through the [Navex Manager Form](#). If unsure of escalation, contact your Compliance Leader or Legal Counsel to discuss.
- **Ensure:** prevent retaliation; be sensitive to colleague perceptions and fears; emphasize GE HealthCare's zero tolerance policy for any retaliation for raising a concern or participating in an investigation.

Help corner

- [Leader's Guide to Integrity](#)
- [Navex Manager Form](#)

Where can I raise a concern?

Ombuds and Open Reporting: we act as the voice of integrity

Ombuds and Open Reporting

GE HealthCare promotes an open environment in which colleagues are encouraged to raise concerns through a variety of channels and are comfortable doing so without fear of retaliation. You should raise a concern when you have a good faith belief, even if you are not certain, that something improper or a violation of law or policy has occurred.

- GE HealthCare strictly prohibits retaliation for raising a concern or participating in an investigation
- GE HealthCare keeps concerns and related parties confidential, to the extent possible, consistent with a full and fair investigation; investigators will release details only on a “need to know” basis

If you see, experience or suspect behaviors that are not consistent with this Code, or any applicable law or Company policy, it is your duty to use any reporting channel for raising a concern.

Anonymity in investigations

If you wish to remain anonymous, you may submit your concern directly using [the webform or the phone hotline information located on the website](#).

Other GE HealthCare in-person channels available to you include your People Leader, Human Resources Manager, Compliance leader, Legal Counsel, your next level of management, [a GE HealthCare regional part-time ombudsperson](#), the [Central Ombuds team](#), Internal Audit and the [GE HealthCare Board of Directors](#). Each of these channels is trained to escalate concerns so that they are examined properly and fairly.

If you choose to use one of the above direct in-person channels, you may remain “known only to Ombuds” if you wish. This means the assigned investigator will not know your identity and will not contact you for an interview. If you identify yourself, your identity will be shared only with those who have a need to know.

Ombuds Program help with reporting

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

Read the [S&L Open Reporting Policy](#) for additional details, and consult the [Raise a Concern infographic](#) for at-a-glance guidance.

Visit the Ombuds Program site:



Help corner

- [Webform or the phone hotline information](#)
- [GE HealthCare regional part-time ombudsperson](#)
- [Central Ombuds team](#)
- [GE HealthCare Board of Directors](#)
- [S&L Insider Open Reporting Policy](#)
- [Raise a Concern infographic](#)
- [Ombuds Program](#)

How do we handle concerns?

GE HealthCare investigation process

GE HealthCare thoroughly examines every concern. During the investigation process, GE HealthCare will:

- Assign an independent and objective investigator
- Obtain the facts through interviews and/or the review of documents
- Recommend corrective action, if appropriate
- Reach conclusions, whenever possible, from the facts the investigator is able to obtain
- Provide the person who raised the original concern (if that person is known) with limited feedback on the outcome, while maintaining the confidentiality and privacy of all involved in the matter

No retaliation

GE HealthCare strictly prohibits retaliation for raising a concern or participating in an investigation. Retaliation is an adverse action given to a colleague for raising a concern or participating in an investigation.

Cooperating with investigations

It is every colleague's responsibility to cooperate fully and honestly with any GE HealthCare investigation by making themselves available for interviews, providing requested documentation and otherwise complying with the reasonable requests of an investigator. Colleagues are also expected to be truthful in all dealings throughout the course of an investigation.

What happens when someone violates the Code?

Violations of this Code, the law or Company policy, or failure to cooperate in an investigation, can result in disciplinary action up to and including termination. Serious violations could involve civil or criminal consequences for the violator and for GE HealthCare.



Examples of conduct that could result in disciplinary action include:

- Violating a law or GE HealthCare policy or encouraging others to do so
- Retaliating against a colleague for reporting an integrity concern
- Failing to promptly report a known or suspected violation of law or policy
- Failing to cooperate fully and honestly in a GE HealthCare investigation
- Failing as a People Leader to ensure compliance with GE HealthCare's integrity principles, policies and the law

The Letter

The Letter summarizes the policies underlying our Code. These policies apply to all colleagues in every part of the business, everywhere in the world. This Code provides an introductory summary to these policies — not the full policies themselves.

Go to [the Compliance Portal](#) for detailed policy information and resources to help you.





**We care
about
safety first**

Environmental, Health, Safety & Sustainability (EHS)

We strive to protect our people, the environment and the communities in which we operate.



Culture at GE HealthCare

- We are dedicated to protecting our people, the environment and the communities with which we interact through robust environmental, health, safety and sustainability programs.
- We see continuous improvement of our EHS performance across the lifecycle of our business as integral to our operational strategy.
- We believe that EHS excellence is key to the ongoing success of our business and the future of our planet; it is an expectation of our internal and external stakeholders that we intend to meet.
- We know that EHS is everyone's responsibility.



EHS policy objectives

- Comply with EHS laws and meet GE HealthCare [EHS standards](#).
- Implement programs to provide our colleagues and contractors with a safe and healthy workplace.
- Assess and manage EHS risk and opportunities associated with our operations, including the design and production of our products and services and the environmental resilience of our operations.
- Mitigate negative environmental impacts and deploy adaptation strategies aimed at delivering long-term business sustainability in alignment with science-based approaches.
- Drive operational accountability for EHS performance and set policies and objectives that are compatible with our strategic direction.
- Implement a risk-based EHS governance process to monitor and evaluate performance.



Your role

- Understand and follow the [EHS policy](#), comply with EHS laws and meet GE HealthCare EHS standards.
- Stop work and alert management or EHS leadership if you perceive that risk to people, the environment or assets is not being properly controlled.
- Promptly report any work-related injuries to your manager or to an EHS or medical professional.
- Report violations of this policy to your People Leader, EHS or through [the Ombuds Program](#).



Help corner

- [S&L Environmental, Health, Safety and Sustainability Policy](#)
- [EHS Portal](#)
- [Ombuds Program](#)

Human Rights

We respect and support human rights.



Culture at GE HealthCare

- We respect all internationally recognized human rights, consistent with the United Nations Guiding Principles on Business & Human Rights. 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.
- We seek to treat everyone affected by our business and supply chain with fairness and dignity.
- We are committed to identifying and addressing relevant human rights risks by remaining alert to suspicious conditions and conducting reasonable due diligence of our suppliers.



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 supplier management to allow us to engage with their 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

- Read GE HealthCare'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 GE HealthCare, customer and supplier sites.
- If you observe any conditions or circumstances that reflect possible mistreatment of workers or other individuals at GE HealthCare, customer or supplier sites, immediately raise a concern through [the Ombuds Program](#).



Integrity in action

- Q: When I visited a supplier facility, I saw some workers who appeared to be children. What should I do?
- A: Immediately raise your concern through [the Ombuds Program](#) with as much detail as possible so the Company can address the concern with the supplier.



Help corner

- [S&L Human Rights Policy](#)
- [GE HealthCare Human Rights Statement of Principles](#)
- [GE HealthCare Prevention of Human Trafficking Compliance Plan](#)
- [Ombuds Program](#)
- [Eyes Always Open Training](#)

Quality & Regulatory Standards

We ensure the quality of our products and services.



Culture at GE HealthCare

- We understand that the quality of GE HealthCare products and services and compliance with all applicable regulatory requirements are key parts of our reputation and the basis of our competitive strength.
- We are committed to patient safety and customer satisfaction in all products and services.
- We comply with all laws and regulations pertaining to the safety, quality and performance requirements of GE HealthCare products and services in all countries in which our products and services are offered.
- We strive for continuous improvement of our products, services, device Quality Management System and pharmaceutical Quality Management System.



Your role

- Adhere to the GE HealthCare device Quality Management System or pharmaceutical Quality Management System, as applicable.
- Utilize only suppliers who have been approved by GE HealthCare according to our device or pharmaceutical Quality Management System requirements, as applicable.
- Strive for continuous quality improvement by utilizing customer feedback, production trends and Lean concepts.
- Raise any compliance, integrity or safety issues or concerns to your People Leader, HR and/or through [the Ombuds Program](#).
- If you observe anything that immediately compromises the safety or quality of products or services, or compliance with the applicable Quality Management System, halt the process and then immediately notify Quality, Regulatory or Compliance.

Additional responsibilities for those involved in product or service design, manufacturing, distribution or servicing:

- Do not engage in any conduct that calls into question the integrity of GE HealthCare data, such as falsifying data, making unauthorized changes or destroying, deleting or overwriting data.
- Do not misrepresent or falsify safety, quality or productivity metrics or any document for internal or external reporting.
- Never bypass processes or take shortcuts; this compromises the safety, quality or regulatory compliance of GE HealthCare products and services and may also compromise the safety of our GE HealthCare colleagues.



Integrity in action

Q: During a milestone review, I raised a concern about a specific deliverable for product verification, which will require rework and potentially delay the timeline. My People Leader seemed frustrated, demanded we move forward and said no further delays would be accepted. Should I be concerned?

A: Yes. While it is acceptable to request that some work be completed with the utmost priority, we must always comply with our Quality Management System. Any concerns regarding noncompliance to requirements (in this case, product verification) must be raised and addressed to ensure patient and product safety and compliance with regulations, despite the delays this may cause. Pressure from any colleague or People Leader to rush or circumvent required deliverables is unacceptable. The behavior should be escalated to your or the colleague's People Leader. Further escalation may be required if it is not addressed appropriately.



Help corner

- [S&L Quality & Regulatory Policy](#)
- [Ombuds Program](#)

Respectful Workplace

We treat one another with fairness and respect.



Culture at GE HealthCare

- We are committed to providing a safe, fair and respectful work environment, and know that it is everyone's responsibility to do so.
- We do not tolerate any form of harassment, discrimination or bullying.
- We are an equal opportunity employer and make all employment decisions based on legitimate business considerations, such as experience, skills, education and performance.



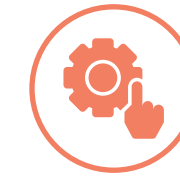
Examples of protected characteristics

Protected characteristics under GE HealthCare 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 and other characteristics protected by local or national law.



Your role

- Treat colleagues, applicants, customers, suppliers, contractors and anyone else with whom you interact, for or on behalf of GE HealthCare, with fairness and respect.
- Create and foster a work environment free from discrimination, bullying or harassment.
- Do not refuse to work or cooperate with others because of their protected characteristics, or because they raised or participated in the investigation of a concern under the [Respectful Workplace Policy](#).
- Never make an unwelcome sexual advance to, or create an unwelcome working environment for, anyone with whom you interact — on or off GE HealthCare premises.



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 their behavior is unacceptable: "What you said is inappropriate here," "I was offended by what you just said" or "Someone might be offended by what you said" are some examples of what you might say; (2) Disrupt or 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 their conduct was not acceptable and must stop; or (3) Raise an integrity concern through [the Ombuds Program](#).
- Q: What does it mean to have zero tolerance for harassment?
- A: This means that the Company will take appropriate action if it determines someone has acted inappropriately under this policy, even if the conduct does not amount to illegal harassment. Appropriate action will vary based on the type and severity of the conduct.

Help corner

- [S&L Respectful Workplace Policy](#)
- [Ombuds Program](#)

Security & Crisis Management

We protect GE HealthCare colleagues, assets and operations.



Culture at GE HealthCare

- We proactively monitor for and assess risks to our people and operations, initiate mitigation plans and ensure our 24/7 global security operation team is prepared to assist with all security issues or concerns.
- We understand that everyone is responsible for maintaining security awareness and following security protocols.
- We create an environment where our colleagues feel comfortable reporting suspicious activities or lapses in security.
- We manage security systems at our sites to assure access only to authorized people.
- We provide duty of care practices and travel oversight to ensure colleagues can travel safely while conducting business.
- We communicate security prevention methods and emergency response with the GE HealthCare community, government officials, the media and the public, as appropriate.



Your contact information

- Crises can happen at any time. It is critical that GE HealthCare has your current contact information to ensure your safety and so we can provide assistance if needed. Please keep both your own contact information (work location, home address and phone number) and your emergency contacts' information updated in [MyHR](#) so we can reach you. This information is kept confidential and only used in an emergency.



Your role

- Be aware of your surroundings, whether you are in a GE HealthCare location, customer site or a public place.
- Adhere to all entry/exit procedures. Wear your badge and ensure others do too.
- Know who your Site or Zone Security Leader is.
- Reply to Emergency Notification Messages that the Company may send you.
- Make business travel arrangements through GE HealthCare Travel and comply with GE HealthCare travel security requirements.
- If hosting or coordinating a GE HealthCare event, help make it safe by completing the form in the [GE HealthCare Event Tool](#).
- Download and become familiar with the Everbridge security application on your mobile device; it is our way of sharing security alerts and allowing you to communicate in a crisis.
- If you see or sense that something is not right, say something. Report security concerns or suspicious events to a Site Security Leader, an Ombudsperson, or to HR, Compliance or [GE HealthCare Global Security](#).



Integrity in action

- Q: I saw people enter our site behind someone else, without using their ID badge. What should I do?
- A: This practice is called “tailgating” or “piggybacking” and is prohibited. Report the incident to a local security guard or a Site Security Leader.



Help corner

- [S&L Security Policy](#)
- [GE HealthCare Global Security Operations Webportal](#)
- [Security Concern Reporting](#)
- [MyHR](#)
- [GE HealthCare Event Tool](#)

We respect our stakeholders



Healthcare Professionals (HCPs) & Healthcare Institutions (HCIs)

We comply with all applicable laws, regulations and industry codes when interacting with HCPs and HCIs.



Culture at GE HealthCare

- We provide truthful, accurate, fair and balanced information about our products when interacting with an HCP or HCI.
- We comply with all applicable laws, including the U.S. Foreign Corrupt Practices Act, regulations and industry codes (e.g., the AdvaMed Code of Ethics, the PhRMA Code, the EFPIA Code, COCIR, the IMC Code and the MedTech Europe Code of Ethical Business Practice).
- We do not bribe, provide, offer or promise anything of value to induce or reward favorable treatment of our products and services.
- We engage in interactions, services and activities with an HCP or an HCI based on a legitimate business need, and not with the intent to obtain or retain business advantage.
- We understand that interactions with HCPs and HCIs can cause actual or apparent Conflicts of Interest, and we have a responsibility to disclose any financial or other interests as appropriate.



Interacting with HCPs and HCIs around the world

- The rules governing the payment or provision of anything of value to HCPs and HCIs are complex and may differ from country to country.
- The [Global Interactions Policy](#) sets forth our compliance requirements regarding HCP and HCI interactions.



Your role

- Accurately and transparently document all payments and other transfers of value to HCPs or HCIs so that they may be reported as required by transparency laws and regulations.
- Ensure that all interactions with an HCP or an HCI are consistent with the mission and code of ethics of that HCP's or HCI's organization or association, in addition to our own *The Spirit & The Letter*.
- Do not pay more than the fair market value for services when engaging an HCP or an HCI.
- Ensure you are knowledgeable about the laws, regulations, local industry codes and policies applicable to interactions with HCPs or HCIs.
- Contact the Compliance team with any questions regarding interactions with an HCP or HCI.

Help corner

- [Global Interactions Policy](#)
- [Improper Payment Prevention Overview](#)
- [Global Compliance Standards & Governance Team](#)

Improper Payments Prevention

We never engage in bribery or corruption of any kind.



Culture at GE HealthCare

- We acknowledge that GE HealthCare prohibits bribery in all business dealings, in every country around the world, with both government officials and the private sector.
- We know that gifts, entertainment or anything else of value provided in exchange for improper assistance or consideration could be viewed as a bribe, and we follow appropriate policy and controls processes.
- We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on GE HealthCare's behalf in business dealings.
- We keep accurate books, records and accounts that correctly reflect the true nature of all transactions.



Examples of improper payment red flags to review

- Demands from a third party to receive its commission payment prior to winning a deal or 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 [Global Interactions Policy](#) before providing anything of value to an HCP, HCI, Government Official (GO), and Government Institution (GI).
- Follow due diligence procedures and require that any third party 1) representing GE HealthCare in promoting, marketing or selling GE HealthCare products to potential customers or 2) working with GE HealthCare in the sale or marketing of GE HealthCare products to potential customers is carefully selected and complies with GE HealthCare policy.
- Do not make facilitation payments to speed up routine administrative actions except where necessary to protect your or a colleague's health or safety, and in that case, immediately report the payment to Compliance.
- Report any red flags to Legal or Compliance.



Help corner

- [Global Interactions Policy](#)
- [Improper Payment Prevention Overview](#)
- [Global Indirect Third Party Policy & SOPs](#)

Indirect Third Parties (ITPs)

We are committed to doing business with ITPs that follow our policies and requirements.



Culture at GE HealthCare

- We prohibit any form of bribery, corruption or undue influence in our dealings with ITPs. We adhere to all applicable anti-corruption laws including the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act and other relevant local laws or regulations.
- We conduct a thorough due diligence process to assess the prospective partner's integrity, reputation and compliance with applicable laws and regulations before entering into any business relationship with an ITP.
- We require that all ITPs acknowledge and adhere to GE HealthCare's *The Spirit & The Letter* and that they commit to working with integrity.
- We expect ITPs to respect and protect the confidentiality of proprietary information and comply with all privacy and data protection laws.
- We require ITPs to comply with all applicable laws and regulations in their business activities including laws related to labor, environment, health and safety, and product quality.



Examples of ITP red flags to review

- The ITP is not willing to provide adequate documentation or undergo a thorough due diligence process. This may include resistance to on-site visits or refusal to cooperate with audits to assess compliance controls and operational practices
- The ITP requests unusual payment arrangements or demands an unusual fee or fund transfers to/from countries unrelated to the transaction
- The ITP has complex ownership structures or is owned by individuals or entities with a history of non-compliance
- The ITP uses non-standard or offshore locations
- The ITP has a history of legal issues or is associated with allegations of improper payments, corruption, fraud, money laundering, trade controls violations, human rights/labor issues, regulatory violations or terrorism-related offenses
- There's negative news or concerns about the ITP such as media issues or irregular internal or external reporting
- The ITP is listed in a government-published list of illegal and untrustworthy entities or is penalized, debarred or convicted in a local jurisdiction of any offense, or there is significant adverse information in verified public domain search



Your role

- Follow the [Global Indirect Third Party Policy](#) and [processes](#) for onboarding, renewals and amendments.
- Report any red flags, triggering events or other concerns and escalate as required.
- Support monitoring and auditing activities related to ITPs.
- If you have questions, contact your local Compliance team.



Help corner

- [Global Indirect Third Party Policy & SOPs](#)

Patients & Patient Organizations

We respect the rights of patients and patient organizations.



Culture at GE HealthCare

- We know that making a difference in patient lives requires that we interact with patients and patient organizations appropriately and in alignment with our policies.
- We provide truthful, accurate, fair and balanced information when interacting with patients and patient organizations.
- We respect the rights of patients, patient privacy and patient data privacy.
- We never attempt to improperly influence a patient or patient organization.



Examples of approved patient and patient organization interactions

- We may provide patient education items directly to patients, healthcare professionals and patient organizations as allowed by local laws and regulations.
- We may engage patients and members of patient organizations as paid or volunteer consultants, provided those engagements comply with all contract terms and conditions, laws, regulations and policies applicable to GE HealthCare, and are properly documented.



Your role

- Ensure that all interactions with patient organizations are consistent with the patient organization's mission, adheres to high ethical standards and respects the independence of the patient organization.
- Properly document and receive approval for all financial support or in-kind contributions to patient organizations, including the nature of the support and the purpose of any activity.
- Contact your regional Compliance team with any questions regarding interactions with patients or patient organizations.



Help corner

- [Global Interactions Policy](#)

Working with Governments

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



Culture at GE HealthCare

- We comply with all contract terms and conditions, and laws and regulations applicable to GE HealthCare when working with governments (e.g., Government Entity, GI and GO).
- We are truthful and accurate when dealing with governments.
- We maintain controls and procedures that address our government business activities specifically to ensure compliance in this highly regulated environment.



Understanding government entities

- A Government Entity includes any federal, state or local government as well as any government department, agency or instrumentality, such as a state-owned or state-controlled entity, including state-owned or state-controlled healthcare institutions. This includes public international organizations such as the United Nations, World Bank and political parties.



Your role

- Understand that government business is different; do not pursue government business without first engaging with 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 prepare bid specifications or avoid procurement requirements.
- Do not deviate from government contract requirements, provide additional products or services, substitute the goods or services to be delivered, or provide customer concessions without written approval from Legal and the GO authorized for contracting.
- 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 Company policy.
- Never enter into discussions with government employees or people close to them about prospective GE HealthCare employment without appropriate approval from Legal and Human Resources.

Additional responsibilities for certain colleagues seeking U.S. state or local government contracts:

- If you are a GE HealthCare officer, director, sales employee or sales manager seeking U.S. state or local government contracts, you must seek preapproval for personal political contributions to comply with state and local "pay to play" laws.



Integrity in action

Q: A U.S. government engineer I met at a prior job 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.



Help corner

- [S&L Working with Governments Policy](#)

Supplier Relationships

We engage with suppliers lawfully and fairly.



Culture at GE HealthCare

- We only use 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 GE HealthCare expectations.
- We require all suppliers to comply with the GE HealthCare Integrity Guide for Suppliers, Contractors and Consultants (the “Supplier Integrity Guide”).
- We conduct due diligence on all suppliers before we work with them. Only our Sourcing team has the authority to commit to supplier contracts.
- We safeguard both GE HealthCare and suppliers’ information, including confidential and proprietary information and personal data.
- We treat all suppliers in a fair and respectful manner.



Examples of supplier red flags to review

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



Your role

- Follow the 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 GE HealthCare’s confidential and proprietary information including, where appropriate, with a confidentiality agreement.
- Safeguard any confidential information or personal data that a supplier provides to GE HealthCare.
- Avoid potential Conflicts of Interest when you select a supplier, and never accept improper gifts or other items of value.

Help corner

- [S&L Supplier Relationship Policy](#)
- [Supplier Integrity Guide](#)

We do what's right



Anti-Money Laundering

We keep GE HealthCare safe from money laundering activities.



Culture at GE HealthCare

- We only conduct business with reputable customers who are involved in legitimate business activities and whose funds come from appropriate sources.
- We implement appropriate controls across GE HealthCare to prevent, detect and respond to money laundering risks.



Examples of money laundering red flags to review

- Unusually complex deal structures
- 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
- Unusual fund transfers to or from countries unrelated to the transaction
- Transactions that might have been structured to evade reporting or recordkeeping requirements



Your role

- Be aware that money laundering can occur in any business relationship that involves the transfer or receipt of funds, including from customers, suppliers, distributors, counterparties and agents.
- Understand and watch out for red flags in your business activities and engagements. Monitor for red flags throughout the lifetime of each party's relationship with GE HealthCare.
- Follow [Know Your Commercial Party / Know Your Supplier](#) enterprise standards to ensure all parties are screened against watchlists and to receive timely due diligence.
- Take reasonable steps to understand and identify each 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.



Integrity in action

- Q: Are third party payments acceptable (e.g., one entity paying on behalf of another)?
- A: It depends. For example, we may have instances where a financial institution is paying on behalf of our customer in the event of a lease or a loan. This may be acceptable if the relationship can be explained, and all parties connected to the financing have been appropriately screened. Ask Legal or Compliance to help ensure appropriateness and policy compliance when approving any third party payments. Discuss any policy questions with Legal or Compliance.



Help corner

- [S&L Anti-Money Laundering Policy](#)
- [Anti-Money Laundering Enterprise Standard](#)
- [Know Your Commercial Party / Know Your Supplier](#)

Conflicts of Interest (COI)

We disclose and manage Conflicts of Interest.



Culture at GE HealthCare

- We always make GE HealthCare business decisions based on what is objectively best for GE HealthCare, and never on what is personally best for ourselves.
- We avoid any actual, potential or perceived Conflicts of Interest with GE HealthCare. When it is not possible to avoid a Conflict of Interest or there is uncertainty, we disclose the conflict to the Company.
- We understand that an affirmative disclosure does not necessarily mean that there is an actual conflict or that the activity is improper. Proactively and fully disclosing any potential conflicts allows the Company to help avoid situations that may violate our [Conflicts of Interest Policy](#).



Examples of potential conflicts to disclose

- Financial interests in a company where you could personally affect or financially benefit from GE HealthCare's business with that company
- Working with, hiring or supervising others with whom you share a close personal relationship
- Outside employment, articles or speaking engagements (paid or unpaid)
- Outside board memberships
- Gifts from suppliers or other third parties



Your role

- Do not engage in outside work (paid or unpaid) that is related to GE HealthCare's business or could negatively affect your work for GE HealthCare.
- Do not use GE HealthCare resources, intellectual property, time or facilities for personal gain.
- Disclose actual, potential or perceived Conflicts of Interest electronically using the Conflicts of Interest questionnaire when you join GE HealthCare and update it when requested.
- [Update your questionnaire here](#) before entering any situation that poses a potential or perceived conflict.
- If you have difficulty accessing the online questionnaire, email GEHC.COI@gehealthcare.com.



Integrity in action

- Q: I want to serve on a board of a company that is in the healthcare industry, but not in an area that overlaps with our business. Is that ok?
- A: Possibly. Before doing so, disclose the potential conflict [here](#). Add all relevant details so the Company can consider whether this will interfere with current or future product roadmaps or business development, whether it poses a risk of disclosing confidential information and whether it will interfere with your GE HealthCare responsibilities.
- Q: Is it ok if family members work for a customer or competitor?
- A: Likely yes, but it depends on whether you interact with the customer or competitor, and your family member's role at the customer or competitor. Disclose the relationship [here](#) so the Company can help you avoid a potential Conflict of Interest and manage the situation.

Help corner

- [S&L Conflicts of Interest Policy](#)
- [Supplier Gift Policy](#)
- [Update your Conflict of Interest Disclosure Questionnaire](#)

Culture and Belonging

We work together to create a culture where every colleague feels connected, valued and empowered to do our best work.



Culture at GE HealthCare

We believe a **Culture of Belonging for all** brings out the best in our people and helps us attract and retain the best talent - when every voice is heard and every perspective valued, we unlock the creativity and insight needed to develop innovative products and solutions that address the diverse needs of the communities we serve.

- We align our Culture and Belonging strategy to our Cultural Operating Principles.
- We embrace a growth mindset and create opportunities for every voice to be heard so that everyone feels empowered to do their best work.
- We understand that all GE HealthCare colleagues play an important role in fostering our Culture of Belonging for all.
- We believe that colleagues with different experiences, backgrounds and ideas, working in a culture of belonging for all, will drive innovation, accelerate growth, enhance Company performance, engage our colleagues and improve health outcomes globally.
- We align our Culture and Belonging strategy to four key dimensions:
 - › **Reimagine our talent ecosystem:** We continuously refine our talent ecosystems to ensure fair opportunities and experiences for our colleagues and to develop the talent of the future.
 - › **Amplify all voices:** We deliberately create an environment where we welcome, elevate and leverage the diverse perspectives of our colleagues, customers and patients.
 - › **Maximize partnerships:** We cultivate our internal and external connections to accelerate innovative solutions and to extend our impact and brand across communities.
 - › **Accelerate accountability:** We hold one another accountable to own our Culture and Belonging strategy at every level of the organization.



Your role

- Review [GE HealthCare's Culture and Belonging strategy](#).
- Take actions to foster an inclusive environment where each person feels seen, valued, respected and able to contribute.
- Be aware of your own biases. Be open to and consider different perspectives when making decisions.
- Consider joining a [Next Generation Resource Group](#) as a member or an ally.



Help corner

- [Culture and Belonging home page](#)
- [GE HealthCare's Culture and Belonging strategy](#)
- [Next Generation Resource Groups](#)

Enterprise Risk Management (ERM)

We proactively assess and mitigate risks related to GE HealthCare's business.



Culture at GE HealthCare

- We identify, assess and manage risks in pursuit of our strategic objectives so that we can mitigate challenges and ensure the safety and efficacy of our products and services.
- We understand that “risk” in this context refers to the likelihood and potential impact of significant and measurable threats or opportunities to the Company. ERM is “[the culture, capabilities and practices, integrated with strategy-setting and performance, that organizations rely on to manage risk in creating, preserving and realizing value.](#)”
- We understand that failure to appropriately address risk may lead to business disruption, harm to patients and our colleagues, financial losses or damage to GE HealthCare's reputation.
- We know that everyone is responsible for risk management at GE HealthCare.
- We acknowledge that GE HealthCare leaders are expected to set an example of appropriate risk-taking behavior by supporting risk management, integrating risk information into decision-making and being transparent about risks by seeking diverse viewpoints.



Benefits of risk management

- Strong risk management practices increase the likelihood of identifying risks that could impact our ability to achieve our strategic priorities.
- Early risk identification enables us to act on potential opportunities and prevent threats, or reduce their impact, through improved decision-making, planning and prioritization.



Your role

- Remain vigilant to potential risks that may impact GE HealthCare's business and operations.
- Escalate any new or changing risks that might impact our business or operations to your People Leader or through [the Ombuds Program](#).
- Contribute to an environment of open communication where risks are freely discussed, and all of our colleagues feel confident to speak up without fear of retaliation.



Help corner

- [Ombuds Program](#)

Environmental, Social & Governance (ESG)

We contribute to a more ethical and sustainable future.



Culture at GE HealthCare

- We strive to enable earlier, better and faster diagnosis and treatment for more people in need, while reducing or eliminating our impact on the environment, serving our people and communities and operating with integrity.
- We recognize the importance of ESG issues in our overall operations and to our key stakeholders, and seek to integrate ESG considerations into our decision-making and culture.
- We strive to reduce environmental impact across the lifecycle of our business and products.
- We support our colleagues and communities and help expand access to quality care for patients.
- We are transparent about key sustainability topics with shareholders, customers and partners.
- We believe that all GE HealthCare colleagues play an important role in operating as a responsible, ethical and transparent Company.
- We comply with all laws and regulations pertaining to ESG-related topics, such as human rights, quality and EHS. See other sections of *The Spirit & The Letter* for more information on these topics.



Your role

- Review GE HealthCare's [public statements on ESG](#) to understand our programs and initiatives.
- Support the Company's implementation of ESG programs and engage in local initiatives related to your region or segment.
- Provide suggestions of new sustainability ideas or practices to Management or your People Leader.
- Follow all Company policies, standards and processes pertaining to ESG-related topics.

 **Help corner**

- [ESG at GE HealthCare](#)
- [GE HealthCare Sustainability Report](#)

Fair Competition

We win with integrity.



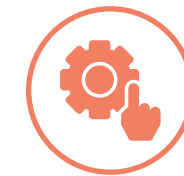
Culture at GE HealthCare

- We believe that a world where healthcare has no limits can only be achieved through free and fair competition, protected by law.
- We believe that competing effectively and dealing fairly with our customers and suppliers drives innovation and productivity, for the benefit of our customers, companies and society.
- We determine our commercial strategy independently, make independent business decisions and do not enter into anticompetitive agreements with competitors, customers, distributors, sales agents, suppliers or any third party.
- We comply with antitrust and competition laws in all our activities.
- We respect public tendering laws and the objective of fair and equal treatment of bidders.
- We don't use market strength to engage in unfair dealings.
- We only meet or communicate with our competitors if we have a legitimate business reason and ensure there is no antitrust concern when interacting.



Your role

- Understand and follow our antitrust policies, procedures and guidelines.
- Win on the merits, persuading with the excellence of our products, innovations and services.
- Make sure to have a legitimate business reason when meeting competitors and avoid contact of any kind with competitors that could create the appearance of improper agreements, understandings or alignments. Actively distance yourself if others are disclosing competitively sensitive information and promptly inform Legal or Compliance.
- Be careful in all interactions with actual or potential competitors to avoid even the perception of an improper agreement. Unspoken or implied agreements, or simply the appearance of unfairness or deception, can create reputational harm and legal liability, including significant fines and even jail time.
- Do not propose or enter into any agreement, understanding or alignment with any actual or potential competitor about any aspect of competition, including agreements or alignments on pricing, bidding, deal terms or the allocation of markets or customers.
- Do not enter into discussions or agreements with other companies to refuse 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.
- Do not disclose, receive or exchange any competitively sensitive information with an actual or potential competitor or its representative, whether in person, electronically or at an industry meeting.
- Never solicit competitor quotes or any competitively sensitive information from customers or former employees of a competitor or any other third party.
- Reach out to Legal or Compliance if you need guidance on these matters.



Integrity in action

- Q: A customer offered to show me a competitor's quote so that I could see how ours compared. What should I do?
- A: You must politely decline the offer. A competitor's quote is competitively sensitive information. Never ask for or accept documents from a customer or any other source that are marked as confidential or that you believe contain confidential or competitively sensitive information. If you do come into possession of a competitor's confidential or competitively sensitive information, make sure to promptly contact Legal or Compliance, who will help you determine next steps. Remember that this might be time-sensitive and require immediate action.

Help corner

- [S&L Fair Competition Policy](#)
- [Antitrust Procedure for Transactions](#)

Insider Trading & Stock Tipping

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



Culture at GE HealthCare

- We understand that GE HealthCare policy requires everyone in possession of material non-public information to maintain its confidentiality.
- We don't use or share material non-public information for any personal benefit. We understand that our policy prohibits insider trading and stock tipping, defined as:
 - › **Insider Trading:** Buying or selling securities (such as stocks or bonds) of GE HealthCare, or any other company, while we are aware of material non-public information that could affect the price of those securities.
 - › **Stock Tipping:** Recommending or suggesting that someone else buy or sell the securities of GE HealthCare, or any other company, while we are aware of material non-public information about that company.



Examples of information that might be material

- Revenue, earnings, margins, cash flows and other financial results and forecasts
- Large transformative acquisitions, dispositions or other transactions
- Reorganizations, impairments, changes or restatements to historic financial results
- Changes in senior leadership
- Significant lawsuits, claims or investigations
- Audit matters



Your role

- Do not engage in insider trading.
- Do not share material non-public information with anyone outside GE HealthCare unless it is necessary for GE HealthCare's business activities and proper controls are in place (such as a non-disclosure agreement with a supplier).
- Do not discuss material non-public GE HealthCare business with family or friends.
- Do not serve as an independent consultant or expert outside of GE HealthCare on business matters within the scope of your GE HealthCare employment.



Integrity in action

- Q: During a team meeting, I learned that GE HealthCare is planning to acquire another company. Can I buy stock in that company before the acquisition is announced? What about buying GE HealthCare stock?
- A: No and no. If you learn that GE HealthCare is considering buying a company or entering into a major contract, assume the information is material and non-public until after GE HealthCare has publicly announced the transaction and the market has had time to absorb the information.

Help corner

- [S&L Insider Trading Policy](#)
- [Securities Trading Policy](#)

International Trade Compliance (ITC)

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



Culture at GE HealthCare

- We comply with global trade controls and economic sanctions that prohibit or restrict 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) and sanctions programs that require government authorization to proceed with a transaction.



Help corner

- [S&L International Trade Compliance Policy](#)
- [Know Your Commercial Party / Know Your Supplier](#)
- [Customs Administrative Service Provider \(ASP\) Procedure](#)
- [Export Controls Enterprise Standard](#)
- [Customs Enterprise Standard](#)



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 out of one country to another country, or to a national of another country. Many countries regulate exports based on the sensitivity of the items from a national security or foreign policy perspective. Exports can include technology transfers through emails, software downloads, and file transfers, and discussions, in addition to the shipment of goods.



Your role

- Request guidance from the ITC team or Legal if you are unsure how to proceed with an export or import transaction.
- Use only GE HealthCare-approved customs agents.
- Follow all business procedures relating to the importation of goods.
- Provide accurate, complete and timely information to the customs team for import transactions including classifying goods.
- Ensure you fully comply with special program requirements before claiming reduced duty rates, export controls and sanction compliance.
- Use the correct export classification of goods, software and technology to determine if they require government authorization for export.
- Follow [Know Your Commercial Party / Know Your Supplier](#) enterprise standards 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 or any other restrictive trade practice.

Reporting & Recordkeeping

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



Culture at GE HealthCare

- We accurately and completely reflect the economic and commercial substance of the Company's business activities consistent with generally accepted accounting principles and standards and regulations for accounting and financial reporting.
- 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, which is in turn based on complete facts with appropriate consideration of short- and long-term risks.
- We comply with all Company policies and applicable laws and regulations related 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.



Examples of reporting and recordkeeping red flags to review

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



Your role

- Protect GE HealthCare's physical, financial and Intellectual Property assets.
- Maintain complete, accurate and timely records that appropriately reflect all business transactions.
- Ensure documents are accurate and complete, and follow Company record retention and disposal policies.
- Do not misrepresent financial results or non-financial metrics (metrics on which operating decisions are often based) to meet performance goals.
- Gain approval from Controllershship or Investor Relations before disclosing GE HealthCare financial information to anyone outside the Company.
- Never engage in inappropriate transactions, including those that knowingly misrepresent the reporting of other parties such as customers or suppliers.
- Get help from your Controllershship team, Compliance or [the Ombuds Program](#) if you become aware of a questionable transaction and report any red flags.



Help corner

- [S&L Reporting and Recordkeeping Policy](#)
- [Ombuds Program](#)

Research & Product Development

We commit to conduct Research and Product Development in a safe and ethical manner.



Culture at GE HealthCare

- We are committed to upholding ethical, scientific and clinical standards, and complying with all laws and regulations, in all Research and Product Development activities worldwide.
- We are committed to the protection and safety of animal and human subjects in Research and Product Development.
- We engage in Research and Product Development based on a legitimate business need, not with the intent to obtain or retain a business advantage.
- We do not offer or give Research or Product Development support to induce the purchase of products or services.
- We provide truthful and accurate information about our Research and Product Development in a manner that is fair and balanced when interacting with an HCP or HCI or scientific publication.



Tips for Research & Product Development

- When we engage in Research and Product Development, we do not pay more than fair market value for services.
- The rules governing the payment or provision of anything to those conducting the Research or Product Development are complex and may differ from country to country. We comply with the policy of the country or region in which the Research and Product Development occurs.
- To maintain the independence of Research and Product Development activities, activities relating to supporting or funding Research and Product Development must be separate from Commercial activities.
- We commit to comply with all contract terms and conditions.



Your role

- Ensure that Research and Product Development is consistent with the mission and code of ethics associated with the contracted organization or association.
- Be knowledgeable about scientific and clinical standards.
- Comply with all laws and regulations in all Research and Product Development.
- If you have any questions regarding conducting Research or Product Development, contact your local Legal or Compliance team.



Help corner

- [Global Interactions Policy](#)
- [Global Compliance Separation Policy](#)
- [GE HealthCare PDx Global Compliance Policy - Separating Research and Medical/Clinical Activities from Commercial Activities in Pharmaceutical Diagnostics](#)
- [GE HealthCare Research Compliance Operational Directive — Research Requests in Public Procurements](#)



We safeguard sensitive data

Acceptable Use

We use GE HealthCare information and GE HealthCare Information Resources responsibly.



Culture at GE HealthCare

- We use and protect information about our Company, our customers, our colleagues and our suppliers in accordance with our policies and applicable laws.
- We understand that GE HealthCare Information Resources may be monitored in accordance with applicable laws to protect the security of GE HealthCare and GE HealthCare information, to maintain GE HealthCare operations, and to comply with applicable laws and business obligations.



What are GE HealthCare information resources?

- Any information we wish to keep confidential to protect our brand and reputation
- Some examples include customer lists, financial data, Intellectual Property, supplier and third party lists, employment contracts or agreements, marketing and promotion plans and information about potential acquisitions, investments or collaborations
- Any systems, devices or other technology managed and approved by GE HealthCare to process, store or transmit GE HealthCare information
- All equipment owned or leased by GE HealthCare, including computers, mobile devices and tablets
- Other equipment, such as personally owned mobile devices, that has been approved for GE HealthCare business (i.e., those in the Bring Your Own Device program)



Your role

- Store GE HealthCare information only in GE HealthCare Information Resources.
- Only use your GE HealthCare identity (e.g., GE HealthCare title or role, email address or credentials) where approved by policy and for GE HealthCare business purposes.
- Return GE HealthCare Information Resources when they are no longer required or have been replaced, and when you are leaving GE HealthCare.
- Limit non-business use of GE HealthCare 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 GE HealthCare policies, standards or guidelines, or interfere with your work.
- Do not store, maintain or back-up GE HealthCare information on personally owned or non-GE HealthCare computers, mobile devices, removable media or cloud storage.
- Do not use equipment or technology banned by GE HealthCare or a government entity.
- Do not use GE HealthCare Information Resources for any unlawful purpose, such as accessing illegally distributed materials that are sexually explicit or otherwise inappropriate.
- Raise any concerns about the appropriate use or protection of GE HealthCare information or GE HealthCare Information Resources via the [Cyber Security Portal](#) or by contacting your People Leader, the [Ombuds Program](#), Legal, Privacy, Information Security or Compliance.



Integrity in action

- Q: I am away from my GE HealthCare 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 GE HealthCare business. This includes business-related communications with colleagues, customers or suppliers, as well as sending yourself any proprietary or sensitive GE HealthCare materials.
- Q: Can I email GE HealthCare information to a contractor who does not have a GE HealthCare email address?
- A: No. Use shared Box folders for such purposes.

Help corner

- [S&L Acceptable Use Policy](#)
- [Cyber Security Portal](#)
- [Ombuds Program](#)

Cyber Security

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



Culture at GE HealthCare

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



Tips for keeping resources secure

- Secure physical copies of GE HealthCare information and GE HealthCare Information Resources when not in use
- Use strong passwords, don't share your password with anyone and don't mix personal and business passwords
- Keep GE HealthCare data on GE HealthCare managed systems. Do not leverage personal email, unapproved Internet sites or personal devices or storage with Company data
- Avoid connecting to public or unsecure Wi-Fi networks
- Avoid clicking on email links or opening attachments from unknown senders and report any suspicious email using the **Report Message** button in Outlook
- Use only approved AI systems. When posting information online, or interacting with any non-approved AI systems, do not disclose GE HealthCare trade secrets, proprietary or other commercially sensitive information



Your role

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



Integrity in action

- Q: Can I use WhatsApp on my GE HealthCare mobile device?
- A: WhatsApp may be installed on GE HealthCare mobile devices for personal use. However, WhatsApp should not be used to conduct GE HealthCare business, or to discuss or transmit GE HealthCare business data.

Help corner

- [S&L Cyber Security Policy](#)
- [Cyber Security Portal](#)

Intellectual Property (IP)

We secure GE HealthCare IP rights to deliver shareholder value and maintain our competitive advantage.



Culture at GE HealthCare

- We know that GE HealthCare's IP is one of the Company's most valuable assets and must be protected to preserve the value of our innovation and brand.
- We defend our IP from unauthorized use. Likewise, we respect the valid IP of others and take appropriate steps to avoid violating any third party rights.
- We only use or distribute GE HealthCare's IP for the benefit of GE HealthCare, and not for personal gain.
- We understand that GE HealthCare owns the IP created by its employees as part of their employment, and that we are all required to review and sign GE HealthCare's Employee Innovation and Proprietary Information Agreement (EIPIA).

Help corner

- [GE HealthCare Intellectual Property Portal](#)
- [S&L Intellectual Property Policy](#)
- [GE HealthCare Brand Guidelines and Brand Team](#)
- [Using the GE Brand in Compliance with the Trademark License](#)
- [Anaqua](#)
- [GE HealthCare's Proprietary Information Classification, Labeling and Handling Policy](#)



What is IP?

- IP includes inventions, technology innovation, manufacturing processes, brands, business plans, marketing documents and graphics, software, product designs and other proprietary information. We protect IP with legal rights, including patents, trade secrets, trademarks, copyrights and design rights.



Your role

- Disclose any inventions created as part of your employment in [Anaqua](#) in a timely manner, working with your [IP Counsel](#).
- Follow GE HealthCare's Brand Guidelines when using the GE HealthCare name and logo.
- Consult with GE HealthCare's Trademark Counsel prior to adopting any new names for products, product features or other offerings.
- Classify, label, store and share all GE HealthCare data, information and documents in accordance with [GE HealthCare's Proprietary Information Classification, Labeling and Handling Policy](#).
- Ensure that access to GE HealthCare information and documents is granted only to individuals with a legitimate business need.
- Do not provide GE HealthCare's IP to a third party without proper internal approval and appropriate legal documentation with the third party.
- Do not take, access, provide access to or use any of GE HealthCare's IP without authorization after leaving GE HealthCare.
- Do not bring, access, keep, share or use a third party's IP within GE HealthCare, without first consulting with and receiving prior approval from your [IP Counsel](#).



Integrity in action

- Q: Can I allow a third party working with GE HealthCare to use our brand in their materials?
- A: The GE Monogram and the name "GE HealthCare" are trademarks of General Electric Company (GE), used by GE HealthCare under license. Any request to allow a third party (e.g., a vendor, partner or organization we sponsor) to use the GE brand should be discussed with [GE HealthCare's Brand team](#) and may also require approval from GE.
- Q: I have innovated on one of our technologies. What should I do to protect this innovation?
- A: Please submit innovation and invention ideas in the [Anaqua](#) tool. The tool includes submission templates and examples to aid new users. After you submit, our patent evaluation teams will review for potential patenting or trade secret protection.

Privacy

We respect individual privacy rights.



Culture at GE HealthCare

- We collect, handle and protect Personal Information responsibly and 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 purpose.



What is Personal Information?

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



Your role

- Limit 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 record retention schedules and secure deletion procedures.
- Consider privacy early in the design of any system, application, process or product. Adopt [Privacy by Design](#) approach when implementing or modifying processes handling Personal Information.
- Report any known or suspected risks or incidents involving Personal Information immediately through the Privacy Leader, [Privacy Incident Management Systems](#), the [Ombuds Program](#), or to your People Leader.



Integrity in action

- Q: We received permission to use a customer's 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 different purpose.



Help corner

- [S&L Privacy Policy](#)
- [Record Retention Policy](#)
- [Privacy Incident Management System](#)
- [Illinois Biometric Information Privacy Policy](#)
- [Employment Data Protection Standard](#)
- [Ombuds Program](#)
- [Privacy by Design and Default Operationalization](#)

Glossary

Key terms that appear in multiple sections are defined here.

Conflicts of Interest

Conflicts of Interest occur when a colleague's activities, decisions or relationships (i.e., the colleague's own interests) are in conflict with, or could be perceived to be in conflict with, GE HealthCare's interests.

Export

The movement of a physical item, software or technology out of one country to another country, or to a national of another country. Many countries regulate exports based on the sensitivity of the items from a national security or foreign policy perspective. Exports can include technology transfers through emails, software downloads, and file transfers, and discussions, in addition to the shipment of goods.

Government Official and Government Institution

A Government Official (GO) is any of the following:

- An officer or employee of a government, agency, department or section thereof; or
- A person acting in an official capacity on behalf of such government, agency or instrumentality; or

- An officer or employee of a (i) public international organization, (ii) government-owned or -controlled company or enterprise (government instrumentality) or (iii) foreign political party, an official of a foreign political party or a foreign political candidate.

A Government Institution (GI) is any government-owned or -controlled company, entity, enterprise, department or agency. Examples: Government ministries, customs bureau, Food & Drug Administration (FDA), state-owned joint ventures. In many countries with Government-controlled Health Systems, Universities and Healthcare Institutions may also be deemed Government Institutions.

Examples of GOs and GIs: Ministers of Health, FDA Employees, Customs Officials, Department of Veterans Affairs Employees, including VA Hospital HCPs, Immigration Officials, Employees of state-owned joint ventures including State University Hospitals, World Bank, World Health Organization (WHO), Red Cross and Red Crescent.

In jurisdictions with government-controlled health or educational systems, HCPs or publicly funded university/ research institution employees also may be deemed GOs. Note that GIs may not always be flagged as high risk when classified as vendors in GE HealthCare systems such as Agora. System flags can be helpful reminders, but colleagues must be aware of these definitions and how to apply them.

Healthcare Institution

Any entity (including some government institutions in countries with government-controlled health systems) or its employees or agents, in a position, directly or indirectly, to purchase, lease, recommend, use, prescribe or arrange for the purchase or lease of any GE HealthCare product or service that is reimbursable under any government healthcare program (e.g., Medicare, Medicaid, and National Health Service) or private health insurance program. The term Healthcare Institution includes representatives of these institutions involved in the decision to purchase, lease or recommend a GE HealthCare product or service.

Examples include Health Systems or Healthcare Associations, Hospitals, Clinics, Academic Institutions, Specialized Care Centers, Nursing Home and Extended Care Facilities, Group Purchasing Organizations, Purchasing Agents and Physicians' Practice Managers and Contract Research Organization.

For the purposes of this policy, we should consider Patient Organizations as Healthcare Institutions or Charitable Organizations, depending on the interaction.

Healthcare Professional

Any individual (including some GOs in countries with government-controlled health systems) in a position, directly or indirectly, to purchase, lease, recommend, use, prescribe or arrange any GE HealthCare product or service that is reimbursable under any government healthcare program (e.g., Medicare, Medicaid and National Health Service) or private health insurance program. This includes any customer, potential customer, person in a position to refer or recommend GE HealthCare products or services, or person licensed to practice medicine.

Examples include Physicians, Physician Assistants, Nurses, Pharmacists, Technicians, Clinicians, Research Coordinators, Formulary Committee Members, CEOs and CFOs.

GE HealthCare generally considers any individuals employed by an HCI to be HCPs for purposes of this policy. Confirm with Compliance if you have questions (i.e., non-practicing physicians).

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.

Indirect Third Party

External commercial parties authorized to (1) represent GEHealthCare in promoting, marketing, supplying and/or selling GE HealthCare products to potential Customers or (2) work with GE HealthCare in sales of GE HealthCare products to potential customers.

Information Resources

Any of:

- Systems, devices or other technology managed and approved by GE HealthCare to process, store or transmit GE HealthCare information;
- Equipment owned or leased by GE HealthCare, including computers, mobile devices and tablets; and
- Other equipment, such as personally owned mobile devices, that has been approved for GE HealthCare business (i.e., those in the Bring Your Own Device program).

Insider Trading

Buying or selling securities (such as stocks or bonds) of GE HealthCare, or any other company, while aware of material non-public information that could affect the price of those securities.

Intellectual Property

Intellectual Property includes inventions, technology innovation, manufacturing processes, brands, business plans, marketing documents and graphics, software, product designs and other proprietary information.

Personal Information

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

Product Development

Any activity undertaken for the purpose of developing, engineering, or creating medical device technologies, software, and solutions, for potential commercialization, and related activities including reimbursement analysis, evidence gathering, data collection and licensing, data use, pricing of products that are not yet commercialized, market studies regarding audiences and markets for products that are not yet commercialized, or other areas of consideration for products that have the potential for commercialization. These activities may include discussing, structuring, and negotiating arrangements with third parties such as alliances, collaborations, joint ventures, licensing arrangements, distribution arrangements, in each case for the purpose of furthering the development, engineering, testing, validation, and commercialization of products that are not yet commercialized.

Research

Any systematic investigation for invention, product development and/or testing of products (whether or not conducted on humans or animals) designed to develop or contribute to knowledge.

Stock Tipping

Recommending or suggesting that someone else buy or sell the securities of GE HealthCare, or any other company, while aware of material non-public information about that company.

Our purpose

Create a world where
healthcare has no limits



Subject to information, consultation or negotiation
with employees' representatives as legally required.

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