

honesty & integrity

The Fenwal Way of Working Together

The Fenwal Code of Conduct



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This guide provides only an overview of Fenwal policies. For more information, see www.fenwalinc.com.

Earning Trust and Respect Through Honesty and Integrity

Fenwal is a worldwide industry leader, a company well poised to build on past achievements and shape the future of transfusion medicine. But just as important as *what* we accomplish is *how* we achieve success. Every day, the decisions we make, the actions we take, and the way we treat one another and our customers will truly define us.

Over the years, the Fenwal name has come to mean a trusted and respected business partner. As a company and as individuals, we must continue to earn that confidence every single day. How do we accomplish this goal?

- By performing our jobs with honesty and integrity.
- By establishing and keeping the highest standards of ethical behavior.
- And by never, ever compromising our principles.

The bottom line? ***Nothing* is more important than our integrity.**

The author Sheldon F. Child described honesty and integrity in these simple but powerful terms:

When we say we will do something, we do it.

When we make a commitment, we honor it.

When we borrow something, we return it.

When we have a financial obligation, we pay it.

When we enter into an agreement, we keep it.

In order for Fenwal to reach its full potential, each of us must make a personal commitment to honesty and integrity in all we do and say. In the process, we will earn the trust and respect of everyone with whom we interact—customers, vendors, colleagues, competitors and regulatory authorities. This is critical to our future success. I look forward to working with you as we build our business—and our outstanding reputation—around the world.



Ron Labrum

The Fenwal Code of Conduct

1. Create and maintain a corporate culture that requires honesty and integrity.
2. Be accountable for our individual actions and activities.
3. Treat everyone with respect.
4. Obey the law and comply with regulatory requirements and follow Fenwal policies.
5. Be honest and fair in all our business activities and relationships.
6. Earn the respect and trust of our coworkers, customers and others with whom we interact by valuing and practicing honesty and integrity, at all times and in all situations.
7. Avoid even the appearance of inappropriate action, unethical behavior or conflict of interest.

At Fenwal, we value
honesty&integrity.

“Having integrity means your actions are consistent with your beliefs. It means you have courage to do what you know is right.... It means you are honest in all aspects of your life.”

Tamara Leatham Bailey

To Whom Does This Apply?

The following must follow and comply with the Fenwal Code of Conduct, company policies and all applicable laws and regulations.

Fenwal Owners, Officers and Employees

- This includes everyone at every location and at every level of Fenwal.

Vendors and Others with Whom We Do Business

- Vendors and others should adopt and follow corporate policies of conduct and compliance consistent with ours.

Third Parties Representing Fenwal

- These may include consultants, independent contractors, sales representatives, agents, distributors and others. If you have responsibility for any such parties, you must:
 - Educate them on applicable Fenwal compliance policies.
 - Require them to comply with the policies.
 - Take immediate action (up to and including termination) if you learn that the individual or organization did not comply.
 - Report any violations to the appropriate corporate, regulatory and/or legal authorities.

“Integrity is not a 90% thing, not a 95% thing; either you have it or you don't.”

Peter Scotese

Employee Responsibilities

Each employee must help Fenwal maintain its commitment to honesty and integrity by understanding policies, adhering to them and working to enforce compliance and avoid violations.

Understand and Comply with Fenwal Policies

- Gain a basic understanding of policies as summarized in this guide.
- Learn the details of Fenwal policies as they apply to your job.
- Strictly follow all policies at all times.
- Seek guidance from your manager, Chief Legal Officer, quality manager or other Fenwal resources if you have questions.

Report Your Concerns

- If you see or suspect a potential violation of any law or Fenwal policy, express your concerns by contacting your manager or calling the Fenwal Ethics Hotline in the United States at **847-550-5139** or toll free at **888-224-1878**.
- If you feel your concern has not been handled properly, pursue the issue through another channel within Fenwal.

Cooperate

- If requested, participate and cooperate fully in any investigations of possible misconduct.

Use of Company Property

Fenwal property must be respected, protected and used only for company business. This includes but is not limited to:

- *Buildings and furniture;*
- *Computers and software;*
- *Office supplies;*
- *Inventory, including components or manufactured product; and*
- *Proprietary and other confidential information, such as trade secrets, copyrights, patents and trademarks*

Manager Responsibilities

Fenwal managers are responsible for creating and maintaining a culture of honesty and integrity through education, awareness and enforcement. They must always demonstrate proper conduct. Managers are accountable for the actions of their direct reports.

Educate Employees

- Help employees understand Fenwal policies and all relevant laws and the critical nature of complying with them.
- Teach employees that reaching for business results must *never* compromise ethical conduct and compliance. Nothing is more important than honesty and integrity.
- Make sure employees understand they can raise concerns without fear of retaliation.

Lead

- Always model proper, ethical conduct and compliance with the law and Fenwal policies.

Be Aware

- Identify potential compliance risks and be vigilant for possible violations.
- Conduct periodic compliance reviews with the help of appropriate Fenwal leaders.

Enforce

- Respond immediately to any concerns an employee raises.
- Move quickly to address weaknesses in compliance policy or practice.
- Take immediate disciplinary action as required.
- Consult with our Chief Legal Officer to make appropriate regulatory and legal disclosures.

Educate
Lead
Be Aware
Enforce

“The glue that holds all relationships together—including the relationship between the leader and the led—is trust, and trust is based on integrity.”

Brian Tracy

How to Report Integrity Concerns

If you become aware that a law or Company policy has or may have been violated, you should immediately report your concerns. This is a responsibility we all share.

Act with Urgency

Taking immediate action will help to protect you, your coworkers and the Company. Of course, our reputation for honesty and integrity is always at stake. Early intervention can often keep a situation from getting worse.

Act with Confidence

Fenwal is committed to quickly addressing and resolving any and all ethics concerns. A process has been developed for employees who wish to report a potential violation of business practice standards. This process encourages you to first seek out local management or human resources for assistance in handling your inquiry. As an alternative, you may also call the Fenwal **Ethics Hotline at (847) 550-5139** or toll free at (888) 224-1878 or send an email to Ethics.Hotline@fenwalinc.com. You are not required to identify yourself. If you choose to identify yourself, your identity will be treated confidentially and will be shared with a limited number of people with the required knowledge or objectivity to address the matter.

Act Without Fear of Retaliation

Fenwal policy strictly prohibits retaliation against anyone who identifies or helps to deal with a compliance or legal violation.

Reporting Resources

To report a compliance concern:

- *Talk with your manager, supervisor, compliance leader or Human Resources.*
- *Call the Fenwal Ethics Hotline in the United States at 847-550-5139 or toll free at 888-224-1878.*
- *Contact the appropriate local business resource (such as Legal, Human Resources or Finance).*
- *Contact corporate management.*

What Happens When You Raise a Concern

Fenwal will investigate your concern immediately, completely and confidentially.

1. Fenwal will assign individuals with the required knowledge and objectivity the task of reviewing the concern.
2. These individuals will gather the relevant facts through interviews and/or document reviews and make recommendations to quickly resolve the matter.

Disciplinary Actions for Violations

First and foremost, Fenwal will ensure that all constituents—employees, managers, third parties, customers and other business partners—do business according to our high standards of honesty and integrity, without exception. Anyone found to be violating these codes of conduct will be subject to discipline, including possible discharge.

"Be true to
your work [and]
your word...."

Henry David Thoreau

honesty&integrity

Fenwal Policies

- Working with Fenwal Employees
- Working with Customers and Suppliers
 - Gifts and Entertainment
 - Supplier Relationships
 - International Trade Controls
 - Privacy
- Working with Government Entities
- Competing Fairly
- Protecting Fenwal's Intellectual Property
- Outside Employment
- Personal Activity in Politics
- Using Electronic Media
- Safety
- Quality

This guide provides only an overview of Fenwal policies. For more information, see the official documents.

Working with Fenwal Employees

What You Need to Know and Do

- At Fenwal, we have a firm commitment to create a workplace where all employees are treated with honesty, integrity, fairness, dignity and respect.
- We strive to maximize employee safety and minimize environmental impact.
- We base our hiring decisions on job qualifications, prior experience, individual skills, leadership qualities and other work-related factors.
- We hire without regard to an individual's race, color, religion, national origin, gender (including pregnancy status), sexual orientation, age, disability, veteran status or other characteristics protected by law.
- We comply with affirmative action laws to increase employment opportunities for women, people of color, people with disabilities, certain veterans and others.

Continued...

We Obey the Law

Fenwal and its employees must always comply with applicable laws regarding:

- *Workplace diversity;*
- *Fair employment opportunity;*
- *Workplace harassment;*
- *Freedom of association;*
- *Privacy;*
- *Immigration;*
- *Working time, wages, hours;*
and
- *Other work-related issues*

Working with Fenwal Employees (continued)

What You Should Watch Out For

- Unsafe working conditions or practices; report them immediately to your manager.
- Any actions or words that create a hostile environment, such as those that may offend members of a particular race, religion, gender and so on.
- Unwelcome sexual advances to anyone with whom we work (Fenwal employee, customer, distributor, dealer, etc.).
- Retaliation against an employee who has voiced a concern to management about a violation of law or Fenwal policy.

**At Fenwal, we
believe in treating
everyone
with
dignity and
respect.**

Working with Customers and Suppliers—Gifts and Entertainment

What You Need to Know and Do

- Giving or receiving gifts and enjoying entertainment together can be an appropriate part of doing business. However, you should follow these guidelines to avoid any illegal or improper acts or an appearance of wrongdoing.
- Before giving or receiving a gift, including entertainment (such as meals or attendance at sports and cultural events), be sure you understand all legal requirements, including anti-kickback and similar regulations, the customer's or supplier's rules and Fenwal's corporate guidelines.
- Never offer a business courtesy (gifts, entertainment, contributions) in any situation that might create the impression of a conflict of interest or improper influence.
- Never offer a gratuity or other payment to speed up a routine administrative production without first checking with Fenwal legal counsel. In some countries, such an arrangement may violate anti-bribery laws.
- Any party representing Fenwal (such as a consultant or sales representative) must follow our corporate policies and all applicable laws.
- Report to your manager and Fenwal's legal department any inappropriate, illegal or suspicious offers from vendors or others with whom you conduct business.

Continued...

Questions To Ask Before Giving or Receiving a Gift or Entertainment

- *Am I sure the offer is legal and ethical, based on Fenwal's and the other party's policies?*
- *Does it represent (or appear to be) a potential conflict of interest?*
- *Is either party trying to place undue influence on the other?*
- *Is it appropriate for the circumstances and for my relationship with the recipient?*
- *How would acceptance of the gift appear to his or her coworkers, or to mine?*
- *Can the gift be shared with others?*
- *How frequently has either party received a gift or entertainment from the other?*

Working with Customers and Suppliers—Gifts and Entertainment (continued)

What You Should Watch Out For

- Preferential treatment such as loans, discounts, personal use of equipment or facilities not available to others.
- Allegations of or a reputation for bribery or other improper or illegal practices concerning a potential business partner (customer, contractor, agent, etc.).
- Your own actions, or those of a customer, supplier, government official, or other close relationship that might appear to improperly influence business decisions, or actions.
- A demand to receive financial consideration (such as a commission) before an award decision is announced, or any commission that appears out of line with standard, accepted business practices.
- Any request to make a payment in a country or to an individual not directly related to a particular transaction (potentially a “money-laundering” situation).

Industry Ethics Guidelines

Fenwal strives to comply with all industry-accepted guidelines for salespeople’s dealings with our customers and prospects.

These include codes of ethics established by:

- *The International Federation of Pharmaceutical Manufacturers & Associations (<http://IFPMA.org/pdf/IFPM A-TheCode-FinalVersion-30May2006-EN.pdf>);*
- *The Pharmaceutical Research and Manufacturers of America (PhRMA); and,*
- *Other regional and national industry groups.*

Working with Customers and Suppliers—Supplier Relationships

What You Need to Know and Do

- Suppliers include any individual or company that provides direct or indirect materials and services; this includes but is not limited to component manufacturers, consultants, contractors, distributors and others.
- You must follow Fenwal's due diligence procedures before selecting an individual or firm to represent the company.
- Our relationships with suppliers must be based on lawful, honest and ethical practices.
- Suppliers must adhere to Fenwal's ethics and compliance policies, as well as all laws dealing with child labor, fair employment, and environmental health and safety.
- Businesses owned by the disadvantaged, minorities, women and disabled veterans should be allowed to earn a portion of Fenwal's business.
- Suppliers with access to confidential Fenwal information must sign a confidentiality agreement (available from Fenwal's legal department).

Continued...

**Actions speak
louder than words.
Avoid even
the appearance of
improper activity.**

Working with Customers and Suppliers—Supplier Relationships (continued)

What You Should Watch Out For

- Awarding business without an open, competitive bidding process.
- Possible conflicts of interest, such as accepting gifts or directing business to a supplier who is a family member or friend.
- Providing personal or other confidential data to suppliers without ensuring they are able to prevent unauthorized or inappropriate use.
- Supplier violations of environmental, child labor, safety or other laws.

Questions To Ask When Dealing with Suppliers

- *Does the supplier understand and agree to abide by Fenwal's policies (ethics, compliance, labor, environmental, etc.)?*
- *Is there any actual or perceived conflict of interest—where personal benefits influence my ability to put Fenwal's best interests first? This includes doing business with:*
 - *Family members;*
 - *Any company in which you have a financial interest; or,*
 - *A supplier that provides similar materials or services to a Fenwal competitor and who has access to our proprietary, competitive or confidential information.*

Working with Customers and Suppliers—International Trade Controls

What You Need to Know and Do

- International Trade Control (ITC) laws apply to a number of Fenwal activities, such as shipping products, exchanging information across national borders (including email and internet), conducting financial transactions, providing technical information to non-U.S. nationals residing in the United States, etc.
- Observe the ITC laws of the United States and any countries in which you do business. Find out if you need special authorization for exporting products, software or technology.
- If there is a conflict between a U.S. law and local law (for example, Mexico, Canada and the European Union adopted laws blocking certain U.S. restrictions), consult with your manager or Fenwal's legal department.
- Provide accurate and complete reporting on all import/export declarations.

Continued...

International Trade Questions

- *Do I fully understand ITC, federal, local and other laws applying to the countries where I do business?*
- *Have I screened potential business partners or suppliers against government watch lists or embargoes/sanctions?*
- *Have I fully and accurately complied with reporting requirements?*
- *Have I reported any unusual or suspicious circumstances to my manager and/or the appropriate legal, compliance or regulatory resources within Fenwal?*

Working with Customers and Suppliers—International Trade Controls (continued)

Things You Should Watch Out For

- Transactions involving embargoed countries or individuals or prohibited end uses.
- Business partners, suppliers and other parties who appear on governmental watch lists or who have a reputation for questionable business practices.
- Restrictive trade practices or boycotts prohibited by U.S. or local laws.
- Import invoices that do not accurately describe the shipment's contents or full value.
- Payment to an exporter that is not reported or included on the invoice.
- Improper import tariff classifications.
- Compliance requirements for preferential duty programs, such as NAFTA.

**“A single lie
destroys a
whole
reputation
of integrity.”**

Baltasar Gracian

Working with Customers and Suppliers—Privacy

What You Need to Know and Do

- Many countries have regulations on the collection and use of consumers' personal data (names, home and business addresses, date of birth and so on), as well as data of company representatives in business-to-business transactions.
- Research and comply with personal privacy regulations that apply in countries where you do business. Personal data should be used only for legitimate business purposes. In many cases, anonymous or aggregated data (rather than personal, individual information) may be appropriately used.
- Strictly protect personal data and prevent unauthorized access, loss or damage.
- If you learn that personal data has been compromised in any way, immediately notify your manager and Fenwal's legal department.

Continued...

Privacy Questions

- *What privacy laws apply in jurisdictions where I conduct business?*
- *What safeguards are in place to prevent inappropriate access to personal data?*
- *Before sharing personal data with outside parties, have I verified that they have appropriate security protocols?*

Working with Customers and Suppliers—Privacy (continued)

What You Should Watch Out For

- Emailing or otherwise broadly distributing personal data to individuals who do not have a legitimate need for it.
- Leaving printouts of personal data where others may see it (printer, copier, fax machine, etc.).
- Transferring personal data across national borders without verifying and complying with each country's legal requirements.
- Any suspicious electronic transactions that indicate personal data may have been accessed by an unauthorized or outside party.

Fenwal Ethics Hotline:

847-550-5139

or toll free at

888-224-1878

**(This United States-based
phone number is applicable for
all employees globally)**

Working with Government Entities

What You Need to Know and Do

- Governments and government-owned entities often have special rules, laws and regulations regarding contracts and business transactions. Always investigate, learn and abide by those requirements.
- Ensure that any third party providing components or services for Fenwal on government projects agrees to abide by our policies and governmental requirements.
- Make sure reports, certifications, statements, proposals and other documents are always up-to-date, accurate and complete.
- Fulfill orders with the exact goods and services specified in the contract, unless you have written authorization to make a substitution.
- Never solicit or acquire proprietary information prior to officially receiving a contract or bid award.
- Never sign government documents without approval from Fenwal.

Continued...

Governmental Entities

These might include:

- *Federal, state, provincial or local governments*
- *Companies or organizations funded by government (such as the U.S. Agency for International Development)*
- *Individuals employed by a government or a government-funded company or organization.*

Working with Government Entities (continued)

What You Should Watch Out For

- Incorrect or unauthorized charges on government contracts.
- Inaccurate or incomplete cost or pricing data.
- Violating government regulations regarding gifts, entertainment, gratuities, recruiting or certification.
- Discussing or negotiating for employment (or other personal benefits) with a government official or his/her family member, when the official has influence over contract awards.

Questions?

If you have questions or concerns about doing business with governments, please contact Fenwal's legal department.

Competing Fairly

What You Need to Know and Do

- Fenwal supports the concepts of free and competitive trade around the world. Buyers should be able to choose from multiple products and vendors at competitive prices. We oppose price fixing, boycotts, illegal monopolies and other practices that impede fair trade.
- Competition and antitrust laws prohibit agreements or understandings between competitors that undermine competition.
- The laws also apply to mergers and acquisitions.
- Each country has its own antitrust and fair competition laws. Consult with Fenwal's legal department to make sure you understand the laws that apply to you and the jurisdictions where you work.
- Strictly avoid any situations that violate (or appear to violate) fair trade practices or applicable laws.
- While Fenwal can choose those with whom it does business, cancellations or refusals to sell can raise antitrust or fair competition rules. Before starting or ending a relationship with dealers, distributors, prospects or customers, consult with legal counsel.

Continued...

Confidential Topics

If you are speaking with a Fenwal competitor or its representatives, you should never discuss the following topics regarding our products or the competitor's:

- *Current or prior pricing practices;*
- *Bids or discounts;*
- *Promotions and marketing plans;*
- *Costs, profits or profit margins;*
- *Volume, sales figures, market share;*
- *Royalties, warranties, and terms or conditions of sale;*
- *Inventories and production capacities—existing or planned; or*
- *Distribution or sales tactics*

Competing Fairly (continued)

What You Should Watch Out For

- Doing business in a country without understanding all applicable free trade/antitrust laws.
- Restricting dealer/distributor rights to set resell prices.
- Technology licenses that restrict the freedom of the licensee or licensor.
- Limiting a distributor's territory or customers without first consulting with legal counsel.
- Requiring suppliers to buy from Fenwal in exchange for our purchasing from them.
- Exclusive arrangements regarding the purchase or sale of products or services.
- Giving special discounts only to a particular customer.
- Distribution deals with competitors.

Interaction with Competitors

Avoid any contact with competitors that may suggest improper agreements or understandings—expressed or implied.

Protecting Fenwal's Intellectual Property

What You Need to Know and Do

- Intellectual property includes Fenwal's patents, trademarks, copyrights, trade secrets and other proprietary information. These are among our most valuable assets. Each Fenwal employee must safeguard the Company's intellectual property.
- We also must respect others' intellectual property rights and never use them without proper authorization. Unauthorized use can expose Fenwal and employees to civil lawsuits, fines and criminal penalties.
- Fenwal's legal department can provide guidance on licenses or approvals required to use others' intellectual property (patents, trademarks or confidential information not generally available). Before signing a confidentiality agreement with an outside party, consult with Fenwal's legal counsel.
- When handling unsolicited ideas from outsiders and employee ideas not covered by the Employee Confidential Information and Innovation Agreement, seek guidance from legal counsel regarding intellectual property rights.
- Confidential information that you need for your job must be used only in that context and never shared outside the company, even after you leave Fenwal.

Continued...

Property We Must Protect

Intellectual property, confidential information and trade secrets include but are not limited to:

- *Data compilations and research;*
- *Engineering design specifications, computer programs, blueprints, prototypes;*
- *Manufacturing methods;*
- *Pricing, budget forecasts, profit margins, costs;*
- *Human resources information such as wages and salary, medical and disability records, identification numbers and other personal data;*
- *Customer lists, marketing strategies, vendor identities, customer pricing; or,*
- *Planned acquisitions/divestitures.*

Protecting Fenwal's Intellectual Property (continued)

What You Should Watch Out For

- Presenting sensitive information at meetings attended by non-Fenwal representatives.
- Discussing confidential information in public places (such as on airplanes, at airports or in restaurants) where you may be overheard; use caution with cell phones, since your call may be intercepted or overheard.
- Sending sensitive information over the Internet without proper safeguards.
- Leaving confidential materials in meeting rooms, on copiers or fax machines or at your desk.
- Hiring a person who previously worked for a competitor, without instituting safeguards to prevent the inadvertent sharing or use of others' intellectual property.
- Introducing a new product or service without verifying that trademarks and other legal protections are in place and that no third-party patents are infringed.

If you observe or suspect a violation of our intellectual property protection policy, call the Fenwal Ethics Hotline:

847-550-5139

or toll free at

888-224-1878

(This United States-based phone number is applicable for all employees globally).

Outside Employment

What You Need to Know and Do

- Some outside employment can create conflict of interest and confidentiality concerns and must be avoided.
- Any outside employment, such as a second job or self-employment, should be treated as completely separate from your work for Fenwal and must not interfere with your company responsibilities.

What You Should Watch Out For

- Using company time or resources, including coworkers' time, for non-Fenwal purposes. A manager may authorize an exception (to perform volunteer work, for example).

Serving on Boards

Before accepting appointment as a member of a Board of Directors for a corporation or government agency, first seek approval from your manager and Fenwal's Chief Legal Officer to ensure there is no potential conflict of interest.

Personal Activity in Politics

What You Need to Know and Do

- Fenwal supports employees' right to participate in politics during their personal, non-work time. These activities might include supporting candidates through contributions of time or money, running for public office, contacting elected officials on issues and so on.
- However, employees must always make it clear that they are expressing their personal political views, not those of Fenwal.
- Employees who intend to seek or serve in an elected or appointed office should discuss their plans with their managers and review how their responsibilities might impact their ability to fulfill their Fenwal job requirements.
- Never use Fenwal mailing lists or assets for personal political activities.

What You Should Watch Out For

- Any donation of Fenwal funds or assets that might be considered a political contribution. It must first be reviewed and approved by the Chief Human Resources Officer and the Chief Legal Officer.

Employees must always make it clear that they are expressing their *personal* political views, not those of Fenwal.

Using Electronic Media

What You Need to Know and Do

- The policy is designed to protect Fenwal and our employees from risks associated with electronic media use. It applies to all employees worldwide, as well as any third parties (such as contractors, distributors, suppliers and so on) who have access to our media.
- Fenwal can and reserves the right to lawfully monitor electronic media use, with or without prior notice. This includes opening or deleting electronic messages or files as needed to ensure security and compliance with applicable laws and Fenwal policies.
- Employees who have a legitimate business need will receive secure access to Fenwal electronic media. Fenwal strictly prohibits use of that media by any unauthorized user.
- Anyone who uses electronic media in violation of company policy may be disciplined, including termination of employment and criminal/civil prosecution.
- Fenwal computers are equipped with antivirus software to help prevent programs that can disrupt or destroy computer files and hardware. Never remove or turn off the software.
- Contact the Help Desk at if you think your computer may be infected.
- All computer users should create secure passwords and keep them confidential.

Continued...

What Is Electronic Media?

Electronic media includes, but is not limited to:

- *Computers, software, collaboration tools, electronic files created from software and fax machines;*
- *Personal data assistants (PDAs), handheld PCs, and similar devices;*
- *Intranet, Internet, e-mail, instant messaging systems;*
- *Voicemail, telephones, cellular phones, pagers; and*
- *Videoconferencing and other audio/video equipment.*

Using Electronic Media (continued)

What You Should Watch Out For

- Storing confidential Fenwal information on an online site, PDA (personal digital assistant) or home computer.
- Improper use of electronic media. Fenwal employees and associated third parties must never intentionally:
 - Forward private, protected or confidential information (such as trade secrets, unpatented technology, financial results and so on) for non-business uses or without proper permission and security; the data could be intercepted and used by unauthorized individuals.
 - View, download or forward offensive material (sexual, pornographic, racist, sexist, defamatory, discriminatory, harassing, threatening and so on).
 - Use company email to distribute junk emails, forward software or send broadcast messages inappropriately to large audiences.
- Leaving computers and other devices unattended.
- Removing or turning off virus-protection software.
- Using the Internet for personal matters in a way that negatively impacts your productivity or ability to fulfill your job responsibilities.

As technology continues to evolve, our electronic media policies will be updated accordingly.

Safety

What You Need to Know and Do

- Fenwal strives to create and maintain a safe and healthy workplace for all employees. Health and safety, including prevention of illness and injury, are critical components of all job-related activities.
- Fenwal will comply with all applicable local, state, federal and international regulations and laws regarding safety. Individually, all employees should also be in full compliance with safety laws, regulations and Fenwal policies.
- The company has established specific procedures related to our manufacturing processes that if followed will help keep employees safe.
- Fenwal will provide ongoing safety training for managers and employees.
- Everyone should be vigilant and immediately report any unsafe conditions.
- Employees must immediately report any safety related incidents or accidents—large or small.

Continued...

**Fenwal is
committed
to providing
a safe workplace
for all employees
around the world.**

Safety (continued)

What You Should Watch Out For

- Any unsafe workplace conditions, such as exposed or unsafe wiring, poorly lit stairs, slippery floors, unlocked doors or gates, obstructed emergency exits or equipment, and so on; report these immediately.
- Failure to follow established safety procedures and policies.
- Wearing loose clothing or jewelry around machinery.
- Failure to wear appropriate personal protective equipment (hearing protection, goggle, shoes, hair nets, gloves and so on).

All of us must
do our part
to make
on the job
safety
a top priority.

Quality

What You Need to Know and Do

- Our quality systems enable Fenwal to efficiently meet customer and regulatory requirements and deliver safe and effective products for customers and patients.
- At Fenwal, quality and continual improvement are everyone's responsibility.
- As a Fenwal employee, you are required to acknowledge that you have read and understand the Quality Policy by signing the commitment statement form when you are hired. The policy is also posted on Fenwal's intranet site.

Fenwal's Quality Policy

- We are committed to being a world leader in providing high quality, safe and effective blood technologies.
- We carry out this commitment through:
 - Understanding and consistently meeting customer requirements.
 - Maintaining an effective and conforming quality system.
 - Pursuing continuous improvement.
- Fenwal employees are expected to incorporate the principles of this policy as part of their daily work.

“A [person] of real character is consistently courageous, being imbued with a basic integrity and a firm sense of principle.”

Martha Boaz

Final Thoughts

Here are five quick questions to ask when you consider whether an action is appropriate or not:

1. Will it allow me to retain my honesty and integrity?
2. Is it legal, ethical and in line with Fenwal policies?
3. How will it affect Fenwal, other employees, our customers or business partners?
4. Would my manager approve? Would my family?
5. If it were reported in the media, would I be proud of my decision?

Study this guide. Research all applicable policies and laws. Make total compliance a part of how you conduct business. As we all work to practice honesty and integrity, Fenwal will build a lasting legacy of trust and respect.

This booklet offers only a summary and overview of Fenwal policies. The company reserves the right to modify, amend or terminate the plans at any time. The policies summarized in this document may change over time. Fenwal employees are responsible for understanding and complying with current policies, procedures, laws, regulations and standards as they apply to our work. The most current information can always be found on the Fenwal intranet.

Fenwal Ethics Hotline:

847-550-5139

or toll free at

888-224-1878

(This United States-based phone number is applicable for all employees globally).