



DO THE RIGHT THING

SUNRISE MEDICAL'S
BUSINESS CODE OF CONDUCT



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LETTER FROM SUNRISE MEDICAL

DEAR SUNRISE MEDICAL ASSOCIATE,

Sunrise Medical is committed to conducting our business in compliance with all applicable laws and in alignment with the highest ethical standards.

For us, acting according to the applicable laws needs to be a given for all companies. What differentiates companies from each other are the ethical standards they set out for themselves and, even more so, how these standards are being incorporated, understood and accepted by their personnel on a day-by-day basis.

Sustaining our reputation and continually striving to earn trust are not only the right things to do; they are essential to our company's success.

It is Management's responsibility to ensure that all of our principles and ethical standards are well known throughout the organization and that all of our colleagues are well prepared to meet the challenges of our ever-changing business environment.

Management takes this responsibility seriously. One building block in that respect is our Business Code of Conduct "Do The Right Thing."

It has been created to serve as a roadmap, guiding us along the path to choosing the most ethical way to govern our business. It incorporates our mission and guiding fundamental principles and highlights the types of ethical and legal issues that may confront us in our marketplace.

Do The Right Thing means very little without the personal commitment of each of us. Our expectation to all Associates is to join us in Sunrise Medical's commitment to Do The Right Thing! If you are a new Associate, we expect you to familiarize yourself with the principles outlined here. If you are a long-time Associate, we expect that you will revisit this guide from time to time. As a Sunrise Medical Associate, we expect you to seek guidance when situations or questions arise regarding these guidelines.

You have our commitment that the leadership of Sunrise Medical will act according to the highest level of integrity in all our business practices. We will also support each of you in adhering to this same standard, not only because it is good business, but also because it is the right thing to do.

Thank you for your help and support.

Sincerely,



Thomas Babacan
President & CEO

Our Mission Statement:

improving
people's
lives

The Principles supporting the
Sunrise Medical business
foundation are based upon:

Our Mission
Our Values

As we conduct business at Sunrise Medical within a framework of internal policies, professional standards, laws and regulations, we also acknowledge that these do not govern all types of behavior we encounter in our daily business dealings. As a result, we also have a Business Code of Conduct for all Sunrise Medical Associates (all Sunrise Medical employees, contractors, officers and directors) called Do The Right Thing.

This Code is based upon our company mission statement and values and has been created to serve as a roadmap we can all follow to strengthen the company's ethical climate and to provide basic guidelines for situations when we are not always sure how to act. By plotting a path along the Sunrise Medical values, Do The Right Thing takes our business to the highest level by putting our values into action in support of fair, correct, and accurate business processes.

Each of us at Sunrise Medical has an obligation to know and understand not only the guidelines contained herein, but also the values on which they are based. As individuals, we are encouraged to raise any issues and concerns we feel are appropriate. If we discover a violation of the Business Code of Conduct, we are responsible for reporting the problem immediately without fear of reprisal.

The Business Code of Conduct, however, does not have answers for every situation or "grey area" dilemma we may confront. When faced with a values dilemma not covered by the Code, ask for help. Your manager or supervisor can assist you with the decision process. Your Human Resources Department can also be contacted, or you can contact the Sunrise Medical Compliance Help Line (see page 19).

OUR VALUES

CUSTOMER FOCUS

Our customer comes first! We are committed to meeting and exceeding the expectations of our customers both external and internal. We are committed to building a relationship based on trust through a prompt and professional response to our customers' needs.

TEAMWORK

Teamwork is a crucial part of our business! Sharing and fostering through communication is important to achieve our business objectives. A positive and proactive team spirit should be adopted by all and lead to improved results. Consider our internal customers and offer support, guidance, motivation and constructive feedback where needed and appropriate.

COMMITMENT

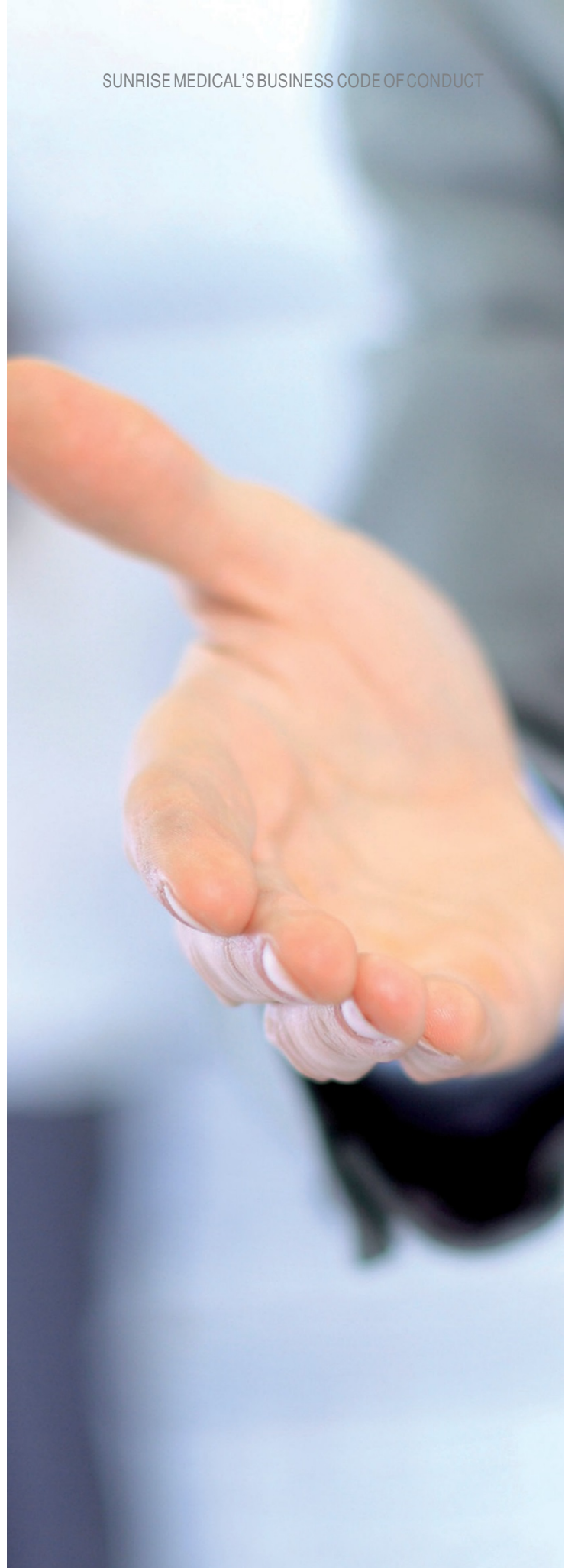
Take responsibility and ownership! Demonstrate determination and initiative and provide added value to Sunrise Medical. Keep to agreements and report deviations in a timely manner in order to find solutions. Get involved and do your best!

INNOVATION

Strive to continually improve! Sunrise Medical and its Associates continually redefine our business and are proactive in providing innovative and effective products, processes and solutions. We encourage our Associates to be open to all new ideas that can improve our business and the lives of our customers and to bring all such ideas forward.

EXCELLENCE

Our goal is to "Improve People's Lives!" We are committed to performing extraordinary efforts every day in all we do, both as individuals and as a company. We are committed to the highest level of quality.



MUTUAL RESPECT

Sunrise Medical is committed to protecting and enhancing Associate safety and treating individuals respectfully. We base employment decisions on business reasons such as qualifications, experience, performance, and achievements, while complying with local and national employment laws and practices. We value diversity and seek to provide a working environment free from intimidation, discrimination, and harassment.

We expect all Sunrise personnel to treat others the way they would like to be treated (i.e., with respect) and avoid using any abusive, derogatory or offensive language. Abusive or harassing conduct is unacceptable in any form. As a Sunrise Medical Associate, you are encouraged to speak out when someone's conduct makes you or others feel uncomfortable. Harassment may include derogatory remarks, epithets, offensive jokes, offensive actions, or the display or circulation of offensive printed, visual or electronic material. Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, or other physical, verbal, or visual conduct based on sex constitutes harassment and is completely unacceptable.

We provide equal opportunity in recruiting, hiring, developing, promoting and compensating without regard to age, color, disability, gender, national origin, race, religion, sexual orientation, veteran status, political affiliation, or any other basis that is protected under applicable law.

Managers bear additional responsibility to help contribute to a positive, motivating workplace where open communication is the norm. Anyone who feels uncomfortable about expressing concerns to Management about workplace issues without fear of criticism, punishment or retribution, should contact Human Resources or contact the Sunrise Medical Compliance Help Line.



HEALTH & SAFETY

Sunrise Medical is committed to providing a clean, healthy, and safe place to work through local health and safety programs designed to prevent work related injuries and illnesses, as well as comply with environmental, health and safety regulations. All Sunrise Medical facilities are committed to be in compliance with applicable environmental, health and safety regulations for the country in which they are located and all applicable national or international product requirements, such as those specified by the Federal Food and Drug Administration (FDA) in the United States, Health Canada in Canada, the Therapeutic Goods Administration (TGA) in Australia, and the Medical Device Regulation (MDR) in the European Community.

Preventive actions are key to providing a healthy and safe place to work. It is important that Associates follow all safety regulations applicable for their particular work area such as the use of Personal Protective Equipment (PPE) where required, as well as all safety regulations for their location. It is important that Associates immediately report any unsafe or high-risk situation or potential incidents to their supervisor or the health and safety representative for their location.

In order to maintain our safety, each of us has an obligation to report to work free from the influence of any substance that could impair our work safety and efficiency. In addition, threats, acts of violence or intimidation, and possession or sale of firearms, other weapons or drugs on (or through) Sunrise Medical property are prohibited. For more detailed information, please consult local policies.

PROTECT THE ENVIRONMENT

Sunrise Medical is committed to protecting the environment and complying with all applicable environmental laws. We have a Global Environmental Initiative focused on environmental responsibility and promoting green thinking throughout the Sunrise Medical global organization and our supply base. By minimizing the environmental impact of our operations, and by operating our business in ways that will foster a sustainable use of natural resources, we will continue to protect the environment.

Sunrise Medical facilities participate with local initiatives, including recycling and energy conservation, to protect the environment. As Associates, we need to support this commitment by complying with our environmental policies and programs. Be sure to notify your supervisor or the Chief Compliance Officer immediately if hazardous materials are not handled or disposed of properly.



PROTECT CONFIDENTIAL INFORMATION

While you are an Associate at Sunrise Medical, you may have access to a variety of confidential and proprietary information about our company and business partners. This may include:

- Confidential and proprietary Sunrise Medical business information, such as, but not limited to, financial data, business plans and budgets, customer lists and customer pricing, inventions, pending public announcements, trade secrets, know how, marketing and sales programs, research and development information, and customer and supplier information.
- Confidential business partner (customers, suppliers, etc.) information such as business processes, organizational information, and financial data.
- Confidential data about individuals (Sunrise Medical Associates, customer or supplier representatives, and end users). Types of data that need to be protected include medical records, Associate salary data, home addresses and telephone numbers, and government identification numbers such as social security numbers or national insurance numbers. Sunrise Medical strives to be in compliance with all applicable data privacy laws throughout the world that govern the protection and use of personal data.

No proprietary or confidential information is to be disclosed to non-Sunrise Medical Associates unless such disclosure has been authorized by appropriate personnel (or management). Disclosure of this information within Sunrise Medical should be on a business, need-to-know basis. It is important to remember that the obligation to protect confidential and proprietary information remains in effect even after you leave Sunrise Medical. Likewise, we require that new Associates honor any confidentiality obligations with previous employers. Managers may not pressure Associates to violate their confidentiality obligations. Any offer of information that may constitute a competitor's trade secrets should be refused unless acceptance is authorized by Executive Management.

In order to restrict unauthorized access, be sure to safeguard confidential or proprietary information whether in hard copy or electronic format.





PROTECTING COMPANY ASSETS

Sunrise Medical facilities, equipment, and product reputation have been established through hard work and commitment by Sunrise Medical and our fellow Associates. We share an obligation to protect our assets as if they were our own. Company property including furnishings, equipment and supplies, as well as intangible or intellectual property, such as patents and trademarks, electronic data and customer and supplier lists, should be used only for authorized business-related purposes. Any acquisition or disposal of property must be pre-authorized using the company's approval authority guidelines and disposal policies. You may also contact your supervisor for more information. As Associates, we also share an obligation to prevent access to company property, including computers and cell phones, electronic documents, and information systems from unauthorized persons. Laptop computers remain company property, exclusively to perform your job, and must be returned when you leave Sunrise Medical. Likewise, no company property should be removed from the facility without specific approval of a supervisor or department manager, with the exception of paperwork and/or portable office equipment necessary to perform your job which must be returned upon completion. Any work developed by Associates or contractors within the scope of their employment with Sunrise Medical belongs to Sunrise Medical.

ELECTRONIC COMMUNICATIONS

Properly using and safeguarding electronic communications poses a unique and complex challenge. Our Communications Systems policies and practices provide detailed information that you are responsible for reviewing and following. The basic rules include:

- Conduct all communication activities consistent with the Sunrise Medical Business Code of Conduct and local policies.
- Never disclose or transmit confidential or proprietary information without proper authorization and security measures.
- Maintain password confidentiality, and never share your passwords with individuals other than authorized Information technology Associates or your department manager when required to do so for valid business purposes.
- Do not use Sunrise Medical communications services and equipment for unethical, inappropriate, or abusive purposes including but not limited to:
 - Conducting illegal activities;
 - Creating, transmitting, storing, or viewing offensive, harassing, demeaning, insulting, defaming, intimidating, or pornographic material, including profanity and jokes;
 - Engaging in activities or soliciting for personal gain or profit or on behalf of another organization; and
 - Using Sunrise Medical equipment for personal use, including participation in on-line chat forums and non-business public groups
- Never attempt to access the files of another Associate without proper approval from a supervisor and Human Resources.
- Do not duplicate or download any software or materials that are copyrighted, patented, trademarked, or otherwise identified as proprietary intellectual property without appropriate licenses and written permission from the Information Technology department.
- Never interfere with the normal operation of any Sunrise Medical computer system or internet gateway.

The use of social media presents certain risks and carries with it certain responsibilities. In general, Sunrise Medical views blogging, personal websites, and social networking sites positively and respects the right of associates to use them as a medium of self-expression. Limited and occasional use of Sunrise Medical systems to engage in these types of activities is acceptable, provided that it is done in a professional, responsible manner and does not interfere with your regular work duties. Please keep in mind, though, that if you engage in these types of activities on Sunrise Medical systems, it is also subject to monitoring. More information on blogging and social media use can be found in Sunrise Medical's Information Communication Policy, but here are some general guidelines to follow:

- Do not use a Sunrise Medical email address to register on social networks, blogs or other online tools for personal use.
- Be honest, accurate, and respectful and post only appropriate content.
- Do not make medically prescriptive recommendations.
- Do not represent yourself as a spokesperson for Sunrise Medical, unless you are expressly authorized to do so.
- Do not speak to the media on behalf of Sunrise Medical without prior authorization from the Marketing department.
- Remember that all guidelines and requirements found in this document and all other Sunrise Medical policies and procedures apply to your online activities.



REPRESENTATION OF OUR PRODUCTS

To uphold the high standards and integrity of Sunrise Medical in the marketplace, our products and services are marketed and sold fairly based on their quality, capabilities, price, service level, and other legitimate attributes. All forms of advertisements will be authentic, and no product will be promoted for a use other than its specifications. These same principles must be adhered to when responding to inquiries from customers, fellow Associates, the media, and regulatory or government agencies.

PRODUCT SAFETY & STANDARDS

Sunrise Medical is dedicated to providing high quality products to fully satisfy the needs of our customers. Since our products are used in situations where failure or error could have serious consequences, it is imperative that we comply with all applicable standards such as the Federal Food and Drug Administration (FDA) in the United States, Health Canada in Canada, the Therapeutic Goods Administration (TGA) in Australia, and the Medical Device Regulation (MDR) in the European Community.

We work to understand our customers and their requirements. We base our decisions and actions regarding product quality on facts and information. If a quality problem or related customer complaint comes to your attention, you are responsible for reporting it to the Sunrise Medical customer service team or escalating it to the appropriate level of authority in a timely fashion, so that complaint can be entered using Sunrise Medical complaint handling procedures. When reporting, be sure to report just the facts (but all of the facts) and avoid editorializing and drawing conclusions. Established quality systems must be followed and documentation must be accurately, completely and timely recorded. To protect the safety of our customers and the users of our products, we ensure that all products meet or exceed all safety standards outlined within our Quality Management System. Our products are extensively tested before being released for production and only products that meet our safety requirements are released for distribution. Each product is labeled with appropriate warnings. These warnings and our product manuals are meant to alert the customer of the risks and limitations of our product.

GIFTS, GRATUITIES & ENTERTAINMENT

It is sometimes customary for persons conducting business with one another to provide or accept meals or similar business courtesies. Business courtesies may be a tangible or intangible benefit. We are able to accept items of a nominal value (i.e., not greater than \$50 USD), but we will not accept anything that might make it appear that our judgment has been compromised. Unsolicited gifts of greater than nominal value should be either returned or given to your supervisor (or Human Resources) to return or otherwise handle in an appropriate manner.

All gifts given or received by a Sunrise Medical Associate must be legal, reasonable, and approved by Management. Gifts, gratuities, or offers of entertainment of any kind made to government or political officers are not permissible. For further details, please consult the sections of this booklet on Government Contracts and International Business.

The exchange of social amenities (i.e. business lunches, dinners or entertainment) between Sunrise Medical Associates and third parties is acceptable when reasonably related to a clear business purpose within the bounds of good taste, within a normal business relationship, and when government contracts or offices are not involved. However, any entertainment, favor, or gift that is repetitive and/or carries a perception of influence for the giver or the recipient is inappropriate. This restriction also applies to immediate family members.

Payments to induce customers to purchase products or refer patients are strictly prohibited. Such inducements may violate fraud and abuse regulations. These types of violations jeopardize government contracts and can carry serious legal penalties, both for the company and the individual.



PURCHASING PRACTICES

Suppliers win Sunrise Medical business based on objective business reasons, such as quality, service, cost, performance, and the maintenance of adequate supply. All purchasing decisions are made solely in the company's best interests. Sunrise Medical purchasing departments maintain an open door and open mind to new vendors/suppliers who may offer an improved product, better service, or more desirable price.



FAIR COMPETITION

You may at times encounter competitors during industry events. Please take special precautions during conversation to avoid discussion of pricing, terms, or other proprietary information. If conversation turns to such matters, you should refuse to discuss this information. Likewise, if a competitor divulges trade secrets or confidential information regarding their company or another business, you should terminate the conversation and inform your supervisor. Refer to Confidentiality Agreements signed at time of hire or promotion for further information on fair competition.

CONFLICTS OF INTEREST

As Associates of Sunrise Medical, we all have the responsibility to preserve and enhance the company's integrity by ensuring our business decisions are based solely on what is best for the company. A "conflict of interest" can occur when an individual's personal interest is or could be adverse to – or appears to be or could be adverse to – the interests of Sunrise Medical. Conflicts of interest also can arise when an individual, or member of his or her immediate family, receives improper personal benefits as a result of his or her position with Sunrise Medical. "Immediate family" includes a person's spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law and anyone who shares such person's home.

As Sunrise Medical Associates, we should avoid any relationship, attempt to influence, or other activity, such as outside employment or consulting, which might impair, or appear to impair, our ability to make objective and fair decisions when performing our jobs. Your actual or potential conflict of interest situations must be reported to Management for guidance on how best to avoid potential conflicts. If you note potential conflict of interest situations involving others, discuss the situation with your local Human Resources Representative or contact the Sunrise Medical Compliance help line (see page 19).

ACCURACY OF COMPANY RECORDS

Accurate books and records are critical to our business in order to meet our financial, business, and legal obligations and to make responsible decisions. All of our business communications must be truthful, clear and compliant with all accounting and legal standards, corporate policies and practices, and other regulations and controls. Accurate and complete records must be kept for all business activities such as, but not limited to, financial statements and analyses, product test documents, product complaints, injury reports, research reports, service records, legal contracts, expense reports, time cards, personnel files, and status reports.

Sunrise Medical is an international company, and financial records must be consistently prepared in accordance with international and local accounting principles and regulations as required or necessary for business purposes. Further, all product record and injury and complaint reports must be complete and accurate.

The responsibility for ensuring accurate product and accounting records resides not only with regulatory, quality, finance and audit personnel but with all Associates. If you become aware of any falsification, inaccuracy, or omission regarding Sunrise Medical records, bring the situation to the attention of the appropriate person at Sunrise Medical or call the Sunrise Medical Compliance Help Line. All reported instances will be thoroughly investigated. In addition, no Associate may mislead, influence, coerce, or manipulate any independent auditor who is performing an audit of our financial, quality or regulatory records.

The effectiveness of our record keeping systems depends on the accuracy of each individual's input and proper maintenance and protection of our records. Therefore, financial, operations, test, and other data need to be maintained in accordance with the company's policies and procedures. Under no circumstances should documents requested by government agencies be destroyed, altered, or falsified, or any effort made to impede, obstruct, or influence an investigation; to do so is a violation of law.



OBSERVING LAWS & REGULATIONS

As a worldwide manufacturer of medical devices, we are required to comply with all applicable laws and regulations regardless of location. We abide by these laws and cooperate with governmental agencies concerning our operation.

If contacted by a governmental agency, you should consult with the appropriate business units, Compliance Officer, and/or Site Directors to seek instructions before responding, submitting to an interview, or allowing government officials access to company facilities or documentation. Notification should also be made to the appropriate Sunrise Medical governing body when applicable (EMC or NAMC). Perceived pressures from supervisors or demands due to business conditions are not an excuse for violating the law or this Business Code of Conduct. If you become aware of the violation of any law, rule, or regulation by Sunrise Medical, whether by its officers, employees, contractors, directors, or any third party doing business on behalf of Sunrise Medical, it is your responsibility to promptly report the matter to your supervisor or your local Sunrise Medical Human Resources Department, or to contact the Sunrise Medical Compliance Help Line (see page 19). While it is Sunrise Medical's desire to address matters internally, nothing in this Business Code of Conduct should discourage you from reporting any illegal activity to the appropriate regulatory authority.

INSIDE INFORMATION & INSIDE TRADING

Inside information is generally defined as non-public information that has not been publicly disclosed and which may have an impact on the value of company securities. Any Associate who has obtained inside information relating to publicly held companies (including clients, vendors, and competitors) is prohibited from trading securities of such companies while an Associate of Sunrise Medical. These rules apply to all Associates, regardless of where they are located. Violation of these rules may expose both the company and the individual to criminal and civil sanctions.

GOVERNMENT CONTRACTS

Our commitment to integrity is constant, whether dealing with government or commercial customers. However, as suppliers to government agencies worldwide, we must abide by special requirements not usually found in the private business sector that have been established to protect the public interest.

These requirements span many areas of business conduct, including, but not limited to, protection of proprietary information, refraining from the offer and acceptance of business courtesies/gratuities, and hiring former government personnel. Government contracts often require the contractor to certify that it has complied with various contract requirements, such as certifying that certain pricing data is accurate, that our products conform to certain specifications, or that Sunrise Medical complies with equal employment opportunity laws.

All Associates dealing with government contracts must keep themselves informed of changes and seek help whenever there is any doubt regarding appropriate behavior. It is the responsibility of these Associates to make sure that the company meets the terms and specifications of all government contracts. Failure to do so can carry serious legal penalties, both for the company and for the individual.

POLITICAL CONTRIBUTIONS

Although we do not discourage Sunrise Medical Associates from engaging in political activities on their own time and at their own expense, no Associate will be compensated or reimbursed by the company for any personal political activity or contribution. For any materials related to political correspondence, you should not use company letterhead or your job title since this might imply a corporate endorsement of your activities or of a particular political candidate. Any political contribution or activity must clearly state that it is not on Sunrise Medical's behalf.

INTERNATIONAL BUSINESS

Since we operate in many different countries around the world, a different dimension of complexity exists for Sunrise Medical business endeavors. In addition to operating legally within other countries, we need to be culturally sensitive and abide by the national and local laws of the countries where we operate. This includes, but is not limited to, immigration, customs, tax or exchange control laws, or regulations. The adherence to these laws is a strict requirement for all Sunrise Medical Associates while conducting company affairs.

IMPORT-EXPORT CONTROL LAWS

Compliance with import and export control laws and trade regulations is the explicit policy of Sunrise Medical and the responsibility of all Associates. Import and export controls can restrict the countries, persons, and entities with which we can trade. They may also require that validated licenses be obtained from applicable government agencies before making or receiving certain shipments. Import and export controls apply to Sunrise Medical's worldwide physical, verbal, and electronic materials. Each import and exporting division must have internal controls to assure full compliance with applicable import and export control laws and regulations.



BOYCOTTS

Under anti-boycott laws, Sunrise Medical may be prohibited from supporting a boycott imposed by one country upon another country. Prohibited conduct may include: agreements to discriminate, refusals to do business with certain countries or companies blacklisted by other governments, and the implementation of letters of credit that require boycott related acts. These laws may also require that requests for information supportive of a boycott be reported to the government in a country where Sunrise Medical operates. Any such request should be immediately directed to Executive Management.



ANTI-TRUST LAWS

Sunrise Medical strives to comply fully with all anti-trust laws. The underlying principle behind these laws is clear: a person who purchases goods in the marketplace should be able to select from a variety of products at competitive prices unrestricted by artificial restraints such as price fixing, illegal monopolies and cartels, and boycotts. Anti-trust law violations can have extremely serious consequences, including criminal prosecution, for both the company and any Associate personally involved in the violation. Unfortunately, the anti-trust laws are complex and vary internationally, so inadvertent violations can occur. As a general rule, you should avoid circumstances that may create the risk of illegality, and you should immediately leave any meeting site where others are discussing illegal acts. Contact Executive Management whenever you are in doubt. You may also contact your local Human Resources Department or contact the Sunrise Medical Compliance Help Line.

ANTI-CORRUPTION ACTS/ ANTI-BRIBERY ACTS

Sunrise Medical is committed to complying with all anti-corruption and anti-bribery laws. Examples include, but are not limited to, the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act 2010. These laws vary, but Sunrise Medical is committed to complying with all aspects of all relevant laws. This means that prohibited activities include, without limitation, giving or receiving bribes of any sort, whether to/from government officials or other third-parties. This includes bribes which may be given on our behalf by third parties. In particular, the bribery of foreign government officials, political party candidates or officials, or political parties is prohibited. Also prohibited are "facilitation payments," which are payments to induce officials to perform routine functions they are otherwise obligated to perform. If you are uncertain about any transaction that you believe may fall within the definitions of bribery, you must contact Executive Management and obtain approval before proceeding.



SEEKING HELP & REPORTING VIOLATIONS

Sunrise Medical encourages Associates to handle violations of the Do The Right Thing program internally through all channels available. However, an external resource is also available if contacting internal resources would be uncomfortable. Internally, Associates may discuss an issue with their supervisor, another member of Management, or the local Human Resources Department.

Externally, Associates may contact the Sunrise Medical Compliance Help Line and may choose to remain anonymous. However, some countries have laws that specify that certain types of incident reports cannot be made anonymously. When that is applicable, you will be asked to identify yourself for legal compliance. Regardless of anonymity, all calls will be handled confidentially. Regardless of the reporting method, the question or report will be directed to the appropriate department for investigation, even when you choose to remain anonymous.

Anyone making a report will not be subject to retaliation or retribution for disclosing a situation he or she feels, in good faith, is in violation of our business conduct standards or the law.



SUNRISE MEDICAL COMPLIANCE HELP LINE

SUNRISE MEDICAL COMPLIANCE HELP LINE

The Sunrise Medical Compliance Help Line is intended to assist you with business dilemmas. In the U.S. and Canada, the Sunrise Medical Compliance Help Line may be reached toll-free at +1-888-475-8977.

In all other countries, including Mexico, call collect: +1-704-759-1269. A language translator will be provided immediately, if required.

Also, you may make a report at <https://sunmed.alertline.com>. This website is a secure website, operated by our Help Line provider. Unless you choose to identify yourself, your anonymity will be maintained. The Help Line provider will not pass along or retain your IP address or any other information that could be used to specifically identify you.

The Help Line is staffed 24x7x365 by trained operators employed by an independent help line service provider. Your anonymity is assured if you choose not to identify yourself. As previously noted, some countries have laws specifying that certain types of incident reports cannot be made anonymously.

Your questions and comments will be documented by the operator and then passed on to the appropriate person or business unit at Sunrise Medical. You will be given the option to call back or check the website for claims filed electronically via the secure website at a designated future date to receive information about the matter. Whether you contact the Help Line or speak with a member of Management or Human Resources, our targeted response time is 5-14 days depending on the type of issue. However, when critical situations arise, a targeted response time is within 24 hours.

Confidential, professional counseling for personal issues is available at each business unit through applicable local programs. Contact your supervisor or the local Human Resources Department for information regarding available resources.

RESOURCE CONTACT INFORMATION

Sunrise Medical Compliance Help Line

888-475-8977 toll-free in the U.S. and Canada
+1-704-759-1269 outside the U.S. and Canada (call collect)

<https://sunmed.alertline.com>

Chief Compliance Officer – Dave Johnston:
+1-303-218-4744 or (dotherightthing@sunmed.com)



