

# Anti-Corruption and Anti-Bribery Program

## Competing with Integrity

**At OSI Systems, our values drive the way we do business. We prohibit corruption and bribery of any kind.**

We are committed to growing and retaining business with the highest ethical standards and in full compliance with laws and regulations. Among our standards of ethical conduct is our strong commitment to carry out our business in a transparent and honest manner, free of corruption of any kind. Our Anti-Corruption Compliance Program ("ACC Program") applies to all of our employees, as well as to those with which we do business, such as distributors and authorized representatives.

At the root of our ACC Program is a prohibition against bribery. We strictly prohibit making, offering, promising, or authorizing a corrupt payment of money (including passive bribe payments), or anything of value, to any other person in order to obtain or retain business, or to direct business, or to achieve any business-related objective.

Our ACC Program helps ensure that we live up to our values and that we comply with international anti-corruption and anti-bribery laws including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. We have designed our ACC Program around a series of anti-bribery controls that are integrated into all aspects of our business. Some of these controls include:

- **Board Oversight.** OSI Systems' Board of Directors and senior management team provide oversight for our ACC Program and other compliance risk areas.
- **Clear Policies.** OSI Systems has issued strict anti-bribery policies that are applicable to both employees and third parties. Our policies guide giving and receiving gifts and entertainment, participation in political activities, engaging third-party sales consultants, and other critical areas.
- **Financial Controls.** We have implemented strict reviews and test controls to help identify and prevent bribery and potentially corrupt payments.
- **Third-party Due Diligence.** We thoroughly vet all potential distributors, suppliers, agents, and any third party representative. Potential third parties with which we do business are also required to enter into contractual agreements with us that expressly prohibit bribery of any kind.
- **Training and Education.** We take this seriously. OSI Systems requires employees and third parties involved in the sale or support of our products to complete training about our anti-corruption policies, how to identify red-flags of possible bribery and corruption, and our clear expectation to report any suspected misconduct.
- **Due Diligence for Mergers and Acquisitions.** Before any potential transaction is considered, OSI Systems conducts comprehensive due diligence regarding compliance with anti-bribery and anti-corruption regulations.
- **Ethics Hotline.** OSI Systems maintains a robust Ethics Hotline for employees and third parties to report suspected misconduct, including bribery or corruption. Reporters may raise concerns anonymously via the internet or via toll-free phone numbers.

We believe that bribery and corruption create market inequality and are bad for business. We strive to continually enhance our culture of integrity and always operate in compliance with our values and the law.