

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 ("ACC") Program applies to all of our employees, as well as to those acting on our behalf, such as distributors and agents.

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

Our ACC Programs 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:

- **Clear Policies.** OSI has issued strict anti-bribery policies which 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 anyone acting on our behalf. Potential business partners are also required to enter into contractual agreements with us which expressly prohibit bribery of any kind.
- **Training and Education.** We take this seriously. OSI 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 a clear expectation to report any suspected misconduct.
- **Due Diligence for Mergers and Acquisitions.** Before any potential transaction is considered, OSI conducts comprehensive due diligence regarding compliance with anti-bribery and anti-corruption regulations.
- **Ethics Hotline.** OSI 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.