



(Revised July 2016)

Danaher Legal/Compliance Issue Escalation Policy

<p><u>Government Investigations</u></p> <ul style="list-style-type: none"> ? Police and other law enforcement agencies or ministries (FBI, Interpol, etc.) ? Regulatory agencies and ministries (ANVISA, SFDA, FDA, etc.) ? Environmental, Health and Safety agencies or ministries (OSHA, EPA, etc.) ? Import, Export and Customs authorities and ministries ? Government subpoenas, email requests, legislative inquiries, letter requests ? Non-routine site visits, inspections, dawn raids, investigations, audits or reviews by an agency responsible for criminal or regulatory enforcement. 	<p><u>Notify</u></p> <ul style="list-style-type: none"> ? Platform/OpCo Legal Department (if applicable) <u>And</u> one of the following ? mary.britton@danaher.com ? daniel.garen@danaher.com ? jim.o'reilly@danaher.com ? Environmental, Health and Safety ? stephen.evanoff@danaher.com ? Import/Export and Customs ? daniel.garen@danaher.com ? juanita.hastings@danaher.com
<p><u>Integrity and Compliance</u></p> <ul style="list-style-type: none"> ? All actual or potential violations of law/regulation. All actual or potential Standards of Conduct violations; for example: ? revenue recognition, accounting misstatements, false or improper entries to books and records ? fraud, corruption, bribery, theft, misappropriation ? gifts in excess of policy limits ? associate conflicts of interest ? FDA quality system or regulatory violations ? workplace violence, discrimination, harassment ? retaliation against an associate for Speaking Up 	<p><u>Notify</u></p> <ul style="list-style-type: none"> ? Platform/OpCo Legal Department (if applicable) Legal must notify: ? daniel.garen@danaher.com Or ? jim.o'reilly@danaher.com ? If no Platform/ OpCo Legal Department ? daniel.garen@danaher.com Escalate the matter <u>before</u> investigating it
<ul style="list-style-type: none"> ? Environmental, Health and Safety (EHS) violations 	<ul style="list-style-type: none"> ? Platform/OpCo Legal Department (if applicable) <u>And</u> ? stephen.evanoff@danaher.com
<ul style="list-style-type: none"> ? Import, Export, Customs violations 	<ul style="list-style-type: none"> ? Platform/OpCo Legal Department (if applicable) <u>And</u> ? daniel.garen@danaher.com

<p><u>Litigation /Arbitration/Subpoenas</u></p> <p>Lawsuit, arbitration demand, or claim by or against OpCo if:</p> <ul style="list-style-type: none"> ? amount at issue > \$250k ? IP involved (patents, trademarks, copyrights, trade secrets) ? important product or market opportunity at issue ? reputational damage to OpCo or DHR possible ? a government agency or state-owned company is a party ? business relationships with other OpCos could be affected ? injunctive/declaratory/equitable relief, class action claims ? substantial risk of material or meritorious counterclaims ? Subpoena or other service of process received ? Approval needed from DHR Legal prior to: ? any threat or claim against a third party (excluding simple collections or enforcing rights against former associates) ? engaging outside counsel if legal spend >\$25K (no OpCo Legal Department), or >\$100K (with OpCo Legal Department) 	<p><u>Notify</u></p> <ul style="list-style-type: none"> ? Platform/OpCo Legal Department (if applicable) <p><u>And</u></p> <ul style="list-style-type: none"> ? mary.britton@danaher.com ? If no Platform/OpCo Legal Department ? mary.britton@danaher.com ? Do not hire private investigators without consulting Platform/OpCo Legal Department.
<p>? Labor, employment, restrictive covenant matters</p>	<p>? Platform/OpCo Legal Department (if applicable)</p> <p>And ? patricia.kim@danaher.com</p>
<p>EHS Incidents</p> <p>Any of the following at an OpCo facility or in work-related field activities: ? fire</p> <ul style="list-style-type: none"> ? fatality ? workplace incident or driving-related injury on company business requiring hospital admission or resulting in other serious injury, e.g., amputation, broken bone, loss of consciousness ? widespread exposure to toxic or potentially harmful materials/chemicals above regulatory limits or in excess of health standards ? acts of nature that result in major facility damage or business interruption of more than one week ? environmental contamination, unpermitted releases, or spills of hazardous materials that significantly interrupt operations or impact the community 	<p>Notify</p> <ul style="list-style-type: none"> ? Platform/OpCo Legal Department and EHSOLC representative (if applicable) And one of the following ? stephen.evanoff@danaher.com ? mary.britton@danaher.com

<p><u>Media Inquires</u></p> <p>? Non-trade media and press inquiries</p> <p>? Do not speak to non-trade media and press before talking to Investor Relations.</p>	<p><u>Notify</u></p> <p>? Investor Relations</p> <p>? matt.gugino@danaher.com</p> <p>? If legal/regulatory aspect, copy Platform/OpCo Legal Department (if applicable) And</p> <p>? jim.o'reilly@danaher.com</p> <p>? mary.britton@danaher.com</p>
<p><u>Cyber Security Events</u></p> <p>? Receipt of fraudulent or impersonating electronic messages that attempt to use authority to wire transfer Danaher funds to a non- standard account</p> <p>? Attempts to commit fraud that would result in financial loss through misrepresentation & impersonation in e-mail, instant messaging, phone call and/or other digital means</p> <p>? All “spear phishing” cyber attacks involving company assets and information.</p>	<p><u>Notify</u></p> <p>? Security Leader</p> <p>? chris.lugo@danaher.com</p> <p>? Platform IT Leader/Manager</p> <p>? Platform/OpCo Legal Department (if applicable)</p> <p>Legal must notify:</p> <p>? daniel.garen@danaher.com</p>