



(Revised July 2016)

## Danaher Legal/Compliance Issue Escalation Policy

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

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

<p><b><u>Media Inquires</u></b></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><b><u>Notify</u></b></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><b><u>Cyber Security Events</u></b></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 &amp; 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><b><u>Notify</u></b></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>