

Anti-Bribery Policy Statement

Introduction

Cochlear is committed to conducting our operations in every country where we do business, in compliance with all applicable laws and regulations against bribery and corruption. We are committed to acting honestly and with transparency in our business dealings.

We are also committed to implementing and enforcing effective systems to counter bribery and corruption.

1. What is a 'bribe'?

- A bribe may take the form of an advantage, inducement, reward, payment or benefit, that is not legitimately due, offered, promised or provided in order to influence a business relationship or decision.

2. Responsibility

- The prevention, detection and reporting of bribery or corruption is the responsibility of all Cochlear Representatives (as defined in section 4).
- We must not bribe, directly or indirectly, government or public officials or private persons, or ask for or accept a bribe.
- We must not bribe, ask for or accept a bribe intended for our benefit or the benefit of our family, friends or acquaintances.
- We must be vigilant to situations where further investigation or due diligence is required.
- We must report our concerns using the options in Section 3.2 of the Whistleblower Protection Policy if we believe or suspect that a breach has taken place or may take place in future.
- The provision of an independent Cochlear Whistleblower Service for Cochlear employees, consultants and contractors to report any suspected or actual bribery or corruption confidentially, and anonymously if they wish (where permitted by local laws and regulations), without fear of reprisal, victimisation or disadvantage.
- In addition to our induction training covering this area, we will provide and participate in regular training related to this Policy.
- We will communicate Cochlear's policy against bribery and corruption, to all our suppliers, contractors and business partners at the outset of any business relationship, and as appropriate during the course of their work for Cochlear.

3. Accounting and Record Keeping

- We must prepare and maintain accurately all accounts, invoices and records related to dealings with and payments to third parties.
- We must report and document all expenditure by Cochlear Representatives related to gifts, hospitality and entertainment, in accordance with applicable regional and local Business Relationship Policies and as required as part of our payment systems when making expense claims.

4. Who does this Policy apply to?

This Policy is applicable to all:

- Cochlear employees, officers and directors, contracted staff, contractors and consultants; and
- third parties that conduct business for or on behalf of Cochlear,

(collectively referred to as **Cochlear Representatives**).

5. What happens if we don't comply?

- Bribery and corruption are very serious offences.
- If anyone to whom this Policy applies is found to have taken part in bribery, they and the company may face heavy fines, be excluded from tendering for public (and private) contracts and suffer reputational harm. An individual may also face criminal and civil liability, lengthy imprisonment and heavy fines.
- Cochlear will treat any breach of this Policy as a serious matter and will take disciplinary action, which may result in termination of employment and/or contract, or reporting of incidents to the relevant authorities.

Anyone who has any query, concern or suggestion about the matters covered by this Policy should ask their Compliance Officer, manager or supervisor (if applicable), People and Culture, Legal Counsel or any other relevant Key Contact under Section 6 of the Global Code of Conduct.