

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

_____, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

GE HEALTHCARE TECHNOLOGIES INC.,
PETER J. ARDUINI, and JAMES K.
SACCARO,

Defendants.

Case No.

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE FEDERAL
SECURITIES LAWS**

DEMAND FOR JURY TRIAL

LAW OFFICES OF HOWARD G. SMITH

Plaintiff _____ (“Plaintiff”), individually and on behalf of all others similarly situated, by and through his attorneys, alleges the following upon information and belief, except as to those allegations concerning Plaintiff, which are alleged upon personal knowledge. Plaintiff’s information and belief is based upon, among other things, his counsel’s investigation, which includes without limitation: (a) review and analysis of regulatory filings made by GE HealthCare Technologies Inc. (“GE HealthCare” or the “Company”) with the United States (“U.S.”) Securities and Exchange Commission (“SEC”); (b) review and analysis of press releases and media reports issued by and disseminated by GE HealthCare; and (c) review of other publicly available information concerning GE HealthCare.

NATURE OF THE ACTION AND OVERVIEW

1. This is a class action on behalf of persons and entities that purchased or otherwise acquired GE HealthCare securities and call options between February 4, 2026 and April 29, 2026, inclusive (the “Class Period”). Plaintiff pursues claims against the Defendants under the Securities Exchange Act of 1934 (the “Exchange Act”).

2. GE HealthCare engages in the development, manufacture, and marketing of products, services, and complementary digital solutions used in the diagnosis, treatment, and monitoring of patients in the United States, Canada, and internationally. The Company operates through four segments: Imaging, Advanced Visualization Solutions, Patient Care Solutions, and Pharmaceutical Diagnostics (“PDx”). PDx is the Company’s segment that develops and supplies imaging agents used in MRI, X-ray/CT, ultrasound, and radiopharmaceuticals used for diagnosis, monitoring, and treatment selection.

3. On April 29, 2026, GE HealthCare reported its financial results for the first quarter of 2026. Among other items, GE HealthCare reported adjusted earnings per share of \$0.99, missing consensus by \$0.06. Further, the Company reported PDx segment EBIT margin fell sharply by 680

basis points year over year to 25.6%. The press release revealed “*Profitability in the quarter was impacted by a discrete PDx supplier issue that has since been resolved*” and “*Given these dynamics, we are taking a prudent approach and reducing our profit outlook.*” The Company cut its full-year 2026 adjusted EPS guidance to a range of \$4.80 to \$5.00, down from prior guidance of \$4.95 to \$5.15.

4. On this news, the price of GE HealthCare shares declined by \$9.01 per share, or 13.2%, to close at \$59.49 per share on April 29, 2026, on unusually heavy trading volume.

5. Throughout the Class Period, Defendants made materially false and/or misleading statements, as well as failed to disclose material adverse facts about the Company’s business, operations, and prospects. Specifically, Defendants failed to disclose to investors: (1) the Company was experiencing undisclosed PDx supply chain issues; (2) the Company overstated the resilience of its supply chain; (3) as a result, the Company was unlikely to achieve its stated full-year 2026 guidance; and (4) that, as a result of the foregoing, Defendants’ positive statements about the Company’s business, operations, and prospects were materially misleading and/or lacked a reasonable basis.

6. As a result of Defendants’ wrongful acts and omissions, and the precipitous decline in the market value of the Company’s securities, Plaintiff and other Class members have suffered significant losses and damages.

JURISDICTION AND VENUE

7. The claims asserted herein arise under Sections 10(b) and 20(a) of the Exchange Act (15 U.S.C. §§ 78j(b) and 78t(a)) and Rule 10b-5 promulgated thereunder by the SEC (17 C.F.R. § 240.10b-5).

8. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 and Section 27 of the Exchange Act (15 U.S.C. § 78aa).

9. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1391(b) and Section 27 of the Exchange Act (15 U.S.C. § 78aa). Substantial acts in furtherance of the alleged fraud or the effects of the fraud have occurred in this Judicial District. Many of the acts charged herein, including the dissemination of materially false and/or misleading information, occurred in substantial part in this Judicial District. In addition, the Company's principal executive offices are in this District.

10. In connection with the acts, transactions, and conduct alleged herein, Defendants directly and indirectly used the means and instrumentalities of interstate commerce, including the United States mail, interstate telephone communications, and the facilities of a national securities exchange.

PARTIES

11. Plaintiff ____, as set forth in the accompanying certification, incorporated by reference herein, purchased GE HealthCare securities during the Class Period, and suffered damages as a result of the federal securities law violations and false and/or misleading statements and/or material omissions alleged herein.

12. Defendant GE HealthCare is incorporated under the laws of Delaware with its principal executive offices located in Chicago, Illinois. GE HealthCare's common stock trades on the NASDAQ exchange under the symbol "GEHC."

13. Defendant Peter J. Arduini ("Arduini") was the Company's Chief Executive Officer ("CEO") at all relevant times.

14. Defendant James K. Saccaro ("Saccaro") was the Company's Chief Financial Officer ("CFO") at all relevant times.

15. Defendants Arduini and Saccaro (together, the "Individual Defendants"), because of their positions with the Company, possessed the power and authority to control the contents of

the Company's reports to the SEC, press releases and presentations to securities analysts, money and portfolio managers and institutional investors, i.e., the market. The Individual Defendants were provided with copies of the Company's reports and press releases alleged herein to be misleading prior to, or shortly after, their issuance and had the ability and opportunity to prevent their issuance or cause them to be corrected. Because of their positions and access to material non-public information available to them, the Individual Defendants knew that the adverse facts specified herein had not been disclosed to, and were being concealed from, the public, and that the positive representations which were being made were then materially false and/or misleading. The Individual Defendants are liable for the false statements pleaded herein.

SUBSTANTIVE ALLEGATIONS

Background

16. GE HealthCare engages in the development, manufacture, and marketing of products, services, and complementary digital solutions used in the diagnosis, treatment, and monitoring of patients in the United States, Canada, and internationally. The Company operates through four segments: Imaging, Advanced Visualization Solutions, Patient Care Solutions, and Pharmaceutical Diagnostics ("PDx"). PDx is the Company's segment that develops and supplies imaging agents used in MRI, X-ray/CT, ultrasound, and radiopharmaceuticals used for diagnosis, monitoring, and treatment selection.

Materially False and Misleading

Statements Issued During the Class Period

17. The Class Period begins on February 4, 2026.¹ On that day, GE HealthCare issued a press release announcing its fourth quarter 2025 and fiscal year ended December 31, 2025

¹ Unless otherwise stated, all emphasis in bold and italics hereinafter is added, and all footnotes are omitted.

financial results. The press release touted the Company's financial results and alleged strong performance, as well as the Company's purported full year 2026 guidance, as follows in relevant part:

Fourth quarter 2025 highlights

- Revenue growth of 7.1%, including Organic revenue growth* of 4.8%, driven primarily by the U.S. and Europe, the Middle East and Africa (EMEA)
- Net income margin of 10.3% and Adjusted earnings before interest and taxes (EBIT) margin* of 16.7%
- Diluted earnings per share (EPS) of \$1.29 and Adjusted EPS* of \$1.44
- Cash flow from operating activities of \$1.0 billion and Free cash flow* of \$916 million

Full year 2025 highlights

- Revenue growth of 4.8%, including Organic revenue growth* of 3.5%
- Organic orders growth of 5.2%
- Net income margin of 10.1% and Adjusted EBIT margin* of 15.3%
- Diluted EPS of \$4.55 and Adjusted EPS* of \$4.59
- Cash flow from operating activities of \$2.0 billion and Free cash flow* of \$1.5 billion
- Company introduces 2026 guidance that reflects growth across all metrics

* * *

GE HealthCare President and CEO Peter Arduini said, "In our third year as a public company, we've made great strides executing our strategy focused on precision care, growth acceleration, and business optimization. We delivered a strong quarter and year with growth in Pharmaceutical Diagnostics, Imaging, and Advanced Visualization Solutions. This reflects healthy capital investment trends, commercial execution and demand for new products.

* * *

2026 guidance

Today, the Company introduces 2026 full-year guidance metrics as follows:

Organic revenue growth* of 3.0% to 4.0% year-over-year

Adjusted EBIT margin* of 15.8% to 16.1%, reflecting an expansion of 50 bps to 80 bps year-over-year

Adjusted effective tax rate (ETR)* in the range of 20.0% to 21.0%

Adjusted EPS* in the range of \$4.95 to \$5.15, representing 7.9% to 12.3% growth year-over-year

Free cash flow* of approximately \$1.7 billion

Expect 2026 tariff impact to be lower than 2025, based on current rates

18. On February 26, 2026, the Company participated in Citi's 2026 Unplugged MedTech and Life Sciences Access Day. During the conference, the Company's CFO, Defendant Saccaro, touted the alleged strength of the PDX business, stating as follows in relevant part:

We'll periodically share some information in the first year of launch on Flyrcado, but our strong bias, given competitive dynamics and all sorts of things, is like let's look at the PDX business in total and see how you feel about that. ***In our case, we feel great about what PDX is doing***, and Vizamyl and Flyrcado are all subsets of that.

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Yes, across the portfolio, I think we feel incredible -- well, first of all, ***we feel very good about the entire offering that we bring to bear. And that's inclusive of PDX.*** I think it's a really relevant part of the portfolio.

19. On March 10, 2026, the Company participated in the Barclays 28th Annual Global Healthcare Conference. During the conference, the Company's CFO, Defendant Saccaro touted the alleged strength of the Company's supply chain, stating as follows in relevant part:

And gosh, we were able to get tariffs down, when most companies were faced with tariffs doubling just because of the nature of the timing of tariffs and inventory rollout. So that was -- I thought that was a fantastic result and a ***testament to execution of our supply chain team and our business teams***. Now a lot has happened since then.

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I think one of the things that we've learned, first through COVID and then through our tariff experience, is ***dual supply, agility of the supply chain and resiliency of***

the supply chain are all so crucial to the success of our company that it's a point of emphasis in every one of our supply chain reviews. And as we think about the strategy that we've put in place and are embarking on, you heard a little bit about it during our earnings call when we talked about moving certain things to different zones, but that's happening all the time in terms of how we think about making sure that we have the most dynamic supply chain available to us.

20. The above statements identified in ¶¶17-19 were materially false and/or misleading, and failed to disclose material adverse facts about the Company's business, operations, and prospects. Specifically, Defendants failed to disclose to investors: (1) the Company was experiencing undisclosed PDx supply chain issues; (2) the Company overstated the resilience of its supply chain; (3) as a result, the Company was unlikely to achieve its stated full-year 2026 guidance; and (4) that, as a result of the foregoing, Defendants' positive statements about the Company's business, operations, and prospects were materially misleading and/or lacked a reasonable basis.

Disclosures at the End of the Class Period

21. On April 29, 2026, GE HealthCare reported its financial results for the first quarter of 2026. Among other items, GE HealthCare reported adjusted earnings per share of \$0.99, missing consensus by \$0.06. Further, the Company reported PDx segment EBIT margin fell sharply by 680 basis points year over year to 25.6%. The press release revealed "***Profitability in the quarter was impacted by a discrete PDx supplier issue that has since been resolved***" and "***Given these dynamics, we are taking a prudent approach and reducing our profit outlook.***" The Company cut its full-year 2026 adjusted EPS guidance to a range of \$4.80 to \$5.00, down from prior guidance of \$4.95 to \$5.15. Specifically, the Company issued a press release which stated as follows, in relevant part:

"Profitability in the first quarter was impacted by a PDx supplier issue that has since been resolved. We saw significant increases in memory chips, oil and freight costs during the first quarter that we assume will impact the rest of 2026. Given these dynamics, we are taking a prudent approach and reducing our profit outlook but

expect to offset more than half of the inflation impact with price and cost actions. Importantly, we are making meaningful progress executing on our new wave of innovation to accelerate future revenue and margin growth.”

First quarter 2026 total company financial performance

- Revenues of \$5.1 billion, up 7.4%, including Organic revenue growth* of 2.9%, driven by Pharmaceutical Diagnostics (PDx), Advanced Visualization Solutions (AVS), and Imaging, with overall strength in U.S., EMEA, and Rest of World.
- Total orders up 1.1% organically versus 10.3% growth in the year-ago period, book-to-bill of 1.07 times and backlog of \$21.8 billion.
- Net income attributable to GE HealthCare of \$389 million versus \$564 million, and Adjusted EBIT* of \$691 million versus \$715 million.
- Net income margin of 7.6% versus 11.8%, down 420 basis points (bps); Adjusted EBIT margin* of 13.5% versus 15.0%, down 150 bps, with both measures negatively impacted by tariffs, a decline in Patient Care Solutions (PCS) and the PDx supplier issue.
- Diluted EPS of \$0.85 versus \$1.23, down \$0.38; Adjusted EPS* of \$0.99 versus \$1.01, down \$0.02.

First quarter 2026 segment financial performance (Unaudited)

Segment (\$ in millions)	Imaging	Advanced Visualization Solutions	Patient Care Solutions	Pharmaceutical Diagnostics
Segment Revenues	\$2,299	\$1,341	\$704	\$770
YoY % change	7.4%	8.2%	(6.5)%	21.7%
YoY % Organic* change	3.8%	4.4%	(8.1)%	9.7%
Segment EBIT	\$180	\$299	\$10	\$197
YoY % change	(9.4)%	14.5%	(79.8)%	(3.9)%
Segment EBIT Margin	7.8%	22.3%	1.4%	25.6%
YoY change	(150) bps	120 bps	(500) bps	(680) bps

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2026 guidance

For the full-year 2026, guidance is as follows:

- Organic revenue growth* of 3.0% to 4.0% year-over-year; unchanged
- Adjusted EBIT margin* of 15.4% to 15.7%, reflecting an expansion of 10 bps to 40 bps year-over-year; this compares to previous Adjusted EBIT margin* guidance of 15.8% to 16.1%
- Adjusted effective tax rate (ETR)* in the range of 20.0% to 21.0%; unchanged
- Adjusted EPS* in the range of \$4.80 to \$5.00, representing 4.6% to 9.0% growth year-over-year; this compares to previous Adjusted EPS* guidance in the range of \$4.95 to \$5.15
- Free cash flow* of approximately \$1.6 billion, in-line with profit outlook; this compares to previous guidance of approximately \$1.7 billion

22. On this news, the price of GE HealthCare shares declined by \$9.01 per share, or 13.2%, to close at \$59.49 per share on April 29, 2026, on unusually heavy trading volume.

CLASS ACTION ALLEGATIONS

23. Plaintiff brings this action as a class action pursuant to Federal Rule of Civil Procedure 23(a) and (b)(3) on behalf of a class, consisting of all persons and entities that purchased or otherwise acquired GE HealthCare securities and call options between February 4, 2026 and April 29, 2026, inclusive, and who were damaged thereby (the “Class”). Excluded from the Class are Defendants, the officers and directors of the Company, at all relevant times, members of their immediate families and their legal representatives, heirs, successors, or assigns, and any entity in which Defendants have or had a controlling interest.

24. The members of the Class are so numerous that joinder of all members is impracticable. Throughout the Class Period, GE HealthCare’s shares actively traded on the NASDAQ. While the exact number of Class members is unknown to Plaintiff at this time and can only be ascertained through appropriate discovery, Plaintiff believes that there are at least hundreds

or thousands of members in the proposed Class. Millions of GE HealthCare shares were traded publicly during the Class Period on the NASDAQ. Record owners and other members of the Class may be identified from records maintained by GE HealthCare or its transfer agent and may be notified of the pendency of this action by mail, using the form of notice similar to that customarily used in securities class actions.

25. Plaintiff's claims are typical of the claims of the members of the Class as all members of the Class are similarly affected by Defendants' wrongful conduct in violation of federal law that is complained of herein.

26. Plaintiff will fairly and adequately protect the interests of the members of the Class and has retained counsel competent and experienced in class and securities litigation.

27. Common questions of law and fact exist as to all members of the Class and predominate over any questions solely affecting individual members of the Class. Among the questions of law and fact common to the Class are:

(a) whether the federal securities laws were violated by Defendants' acts as alleged herein;

(b) whether statements made by Defendants to the investing public during the Class Period omitted and/or misrepresented material facts about the business, operations, and prospects of GE HealthCare; and

(c) to what extent the members of the Class have sustained damages and the proper measure of damages.

28. A class action is superior to all other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable. Furthermore, as the damages suffered by individual Class members may be relatively small, the expense and burden

of individual litigation makes it impossible for members of the Class to individually redress the wrongs done to them. There will be no difficulty in the management of this action as a class action.

UNDISCLOSED ADVERSE FACTS

29. The market for GE HealthCare's securities was open, well-developed and efficient at all relevant times. As a result of these materially false and/or misleading statements, and/or failures to disclose, GE HealthCare's securities traded at artificially inflated prices during the Class Period. Plaintiff and other members of the Class purchased or otherwise acquired GE HealthCare's securities relying upon the integrity of the market price of the Company's securities and market information relating to GE HealthCare, and have been damaged thereby.

30. During the Class Period, Defendants materially misled the investing public, thereby inflating the price of GE HealthCare's securities, by publicly issuing false and/or misleading statements and/or omitting to disclose material facts necessary to make Defendants' statements, as set forth herein, not false and/or misleading. The statements and omissions were materially false and/or misleading because they failed to disclose material adverse information and/or misrepresented the truth about GE HealthCare's business, operations, and prospects as alleged herein.

31. At all relevant times, the material misrepresentations and omissions particularized in this Complaint directly or proximately caused or were a substantial contributing cause of the damages sustained by Plaintiff and other members of the Class. As described herein, during the Class Period, Defendants made or caused to be made a series of materially false and/or misleading statements about GE HealthCare's financial well-being and prospects. These material misstatements and/or omissions had the cause and effect of creating in the market an unrealistically positive assessment of the Company and its financial well-being and prospects, thus causing the Company's securities to be overvalued and artificially inflated at all relevant times. Defendants'

materially false and/or misleading statements during the Class Period resulted in Plaintiff and other members of the Class purchasing the Company's securities at artificially inflated prices, thus causing the damages complained of herein when the truth was revealed.

LOSS CAUSATION

32. Defendants' wrongful conduct, as alleged herein, directly and proximately caused the economic loss suffered by Plaintiff and the Class.

33. During the Class Period, Plaintiff and the Class purchased GE HealthCare's securities at artificially inflated prices and were damaged thereby. The price of the Company's securities significantly declined when the misrepresentations made to the market, and/or the information alleged herein to have been concealed from the market, and/or the effects thereof, were revealed, causing investors' losses.

SCIENTER ALLEGATIONS

34. As alleged herein, Defendants acted with scienter since Defendants knew that the public documents and statements issued or disseminated in the name of the Company were materially false and/or misleading; knew that such statements or documents would be issued or disseminated to the investing public; and knowingly and substantially participated or acquiesced in the issuance or dissemination of such statements or documents as primary violations of the federal securities laws. As set forth elsewhere herein in detail, the Individual Defendants, by virtue of their receipt of information reflecting the true facts regarding GE HealthCare, their control over, and/or receipt and/or modification of GE HealthCare's allegedly materially misleading misstatements and/or their associations with the Company which made them privy to confidential proprietary information concerning GE HealthCare, participated in the fraudulent scheme alleged herein.

APPLICABILITY OF PRESUMPTION OF RELIANCE

(FRAUD-ON-THE-MARKET DOCTRINE)

35. The market for GE HealthCare's securities was open, well-developed and efficient at all relevant times. As a result of the materially false and/or misleading statements and/or failures to disclose, GE HealthCare's securities traded at artificially inflated prices during the Class Period. On February 27, 2026, the Company's share price closed at a Class Period high of \$84.27 per share. Plaintiff and other members of the Class purchased or otherwise acquired the Company's securities relying upon the integrity of the market price of GE HealthCare's securities and market information relating to GE HealthCare, and have been damaged thereby.

36. During the Class Period, the artificial inflation of GE HealthCare's shares was caused by the material misrepresentations and/or omissions particularized in this Complaint causing the damages sustained by Plaintiff and other members of the Class. As described herein, during the Class Period, Defendants made or caused to be made a series of materially false and/or misleading statements about GE HealthCare's business, prospects, and operations. These material misstatements and/or omissions created an unrealistically positive assessment of GE HealthCare and its business, operations, and prospects, thus causing the price of the Company's securities to be artificially inflated at all relevant times, and when disclosed, negatively affected the value of the Company shares. Defendants' materially false and/or misleading statements during the Class Period resulted in Plaintiff and other members of the Class purchasing the Company's securities at such artificially inflated prices, and each of them has been damaged as a result.

37. At all relevant times, the market for GE HealthCare's securities was an efficient market for the following reasons, among others:

(a) GE HealthCare shares met the requirements for listing, and was listed and actively traded on the NASDAQ, a highly efficient and automated market;

(b) As a regulated issuer, GE HealthCare filed periodic public reports with the SEC and/or the NASDAQ;

(c) GE HealthCare regularly communicated with public investors via established market communication mechanisms, including through regular dissemination of press releases on the national circuits of major newswire services and through other wide-ranging public disclosures, such as communications with the financial press and other similar reporting services; and/or

(d) GE HealthCare was followed by securities analysts employed by brokerage firms who wrote reports about the Company, and these reports were distributed to the sales force and certain customers of their respective brokerage firms. Each of these reports was publicly available and entered the public marketplace.

38. As a result of the foregoing, the market for GE HealthCare's securities promptly digested current information regarding GE HealthCare from all publicly available sources and reflected such information in GE HealthCare's share price. Under these circumstances, all purchasers of GE HealthCare's securities during the Class Period suffered similar injury through their purchase of GE HealthCare's securities at artificially inflated prices and a presumption of reliance applies.

39. A Class-wide presumption of reliance is also appropriate in this action under the Supreme Court's holding in *Affiliated Ute Citizens of Utah v. United States*, 406 U.S. 128 (1972), because the Class's claims are, in large part, grounded on Defendants' material misstatements and/or omissions. Because this action involves Defendants' failure to disclose material adverse information regarding the Company's business operations and financial prospects—information that Defendants were obligated to disclose—positive proof of reliance is not a prerequisite to

recovery. All that is necessary is that the facts withheld be material in the sense that a reasonable investor might have considered them important in making investment decisions. Given the importance of the Class Period material misstatements and omissions set forth above, that requirement is satisfied here.

NO SAFE HARBOR

40. The statutory safe harbor provided for forward-looking statements under certain circumstances does not apply to any of the allegedly false statements pleaded in this Complaint. The statements alleged to be false and misleading herein all relate to then-existing facts and conditions. In addition, to the extent certain of the statements alleged to be false may be characterized as forward looking, they were not identified as “forward-looking statements” when made and there were no meaningful cautionary statements identifying important factors that could cause actual results to differ materially from those in the purportedly forward-looking statements. In the alternative, to the extent that the statutory safe harbor is determined to apply to any forward-looking statements pleaded herein, Defendants are liable for those false forward-looking statements because at the time each of those forward-looking statements was made, the speaker had actual knowledge that the forward-looking statement was materially false or misleading, and/or the forward-looking statement was authorized or approved by an executive officer of GE HealthCare who knew that the statement was false when made.

FIRST CLAIM

Violation of Section 10(b) of The Exchange Act and

Rule 10b-5 Promulgated Thereunder

Against All Defendants

41. Plaintiff repeats and re-alleges each and every allegation contained above as if fully set forth herein.

42. During the Class Period, Defendants carried out a plan, scheme and course of conduct which was intended to and, throughout the Class Period, did: (i) deceive the investing public, including Plaintiff and other Class members, as alleged herein; and (ii) cause Plaintiff and other members of the Class to purchase GE HealthCare's securities at artificially inflated prices. In furtherance of this unlawful scheme, plan and course of conduct, Defendants, and each defendant, took the actions set forth herein.

43. Defendants (i) employed devices, schemes, and artifices to defraud; (ii) made untrue statements of material fact and/or omitted to state material facts necessary to make the statements not misleading; and (iii) engaged in acts, practices, and a course of business which operated as a fraud and deceit upon the purchasers of the Company's securities in an effort to maintain artificially high market prices for GE HealthCare's securities in violation of Section 10(b) of the Exchange Act and Rule 10b-5. All Defendants are sued either as primary participants in the wrongful and illegal conduct charged herein or as controlling persons as alleged below.

44. Defendants, individually and in concert, directly and indirectly, by the use, means or instrumentalities of interstate commerce and/or of the mails, engaged and participated in a continuous course of conduct to conceal adverse material information about GE HealthCare's financial well-being and prospects, as specified herein.

45. Defendants employed devices, schemes and artifices to defraud, while in possession of material adverse non-public information and engaged in acts, practices, and a course of conduct as alleged herein in an effort to assure investors of GE HealthCare's value and performance and continued substantial growth, which included the making of, or the participation in the making of, untrue statements of material facts and/or omitting to state material facts necessary in order to make the statements made about GE HealthCare and its business operations

and future prospects in light of the circumstances under which they were made, not misleading, as set forth more particularly herein, and engaged in transactions, practices and a course of business which operated as a fraud and deceit upon the purchasers of the Company's securities during the Class Period.

46. Each of the Individual Defendants' primary liability and controlling person liability arises from the following facts: (i) the Individual Defendants were high-level executives and/or directors at the Company during the Class Period and members of the Company's management team or had control thereof; (ii) each of these defendants, by virtue of their responsibilities and activities as a senior officer and/or director of the Company, was privy to and participated in the creation, development and reporting of the Company's internal budgets, plans, projections and/or reports; (iii) each of these defendants enjoyed significant personal contact and familiarity with the other defendants and was advised of, and had access to, other members of the Company's management team, internal reports and other data and information about the Company's finances, operations, and sales at all relevant times; and (iv) each of these defendants was aware of the Company's dissemination of information to the investing public which they knew and/or recklessly disregarded was materially false and misleading.

47. Defendants had actual knowledge of the misrepresentations and/or omissions of material facts set forth herein, or acted with reckless disregard for the truth in that they failed to ascertain and to disclose such facts, even though such facts were available to them. Such defendants' material misrepresentations and/or omissions were done knowingly or recklessly and for the purpose and effect of concealing GE HealthCare's financial well-being and prospects from the investing public and supporting the artificially inflated price of its securities. As demonstrated by Defendants' overstatements and/or misstatements of the Company's business, operations,

financial well-being, and prospects throughout the Class Period, Defendants, if they did not have actual knowledge of the misrepresentations and/or omissions alleged, were reckless in failing to obtain such knowledge by deliberately refraining from taking those steps necessary to discover whether those statements were false or misleading.

48. As a result of the dissemination of the materially false and/or misleading information and/or failure to disclose material facts, as set forth above, the market price of GE HealthCare's securities was artificially inflated during the Class Period. In ignorance of the fact that market prices of the Company's securities were artificially inflated, and relying directly or indirectly on the false and misleading statements made by Defendants, or upon the integrity of the market in which the securities trades, and/or in the absence of material adverse information that was known to or recklessly disregarded by Defendants, but not disclosed in public statements by Defendants during the Class Period, Plaintiff and the other members of the Class acquired GE HealthCare's securities during the Class Period at artificially high prices and were damaged thereby.

49. At the time of said misrepresentations and/or omissions, Plaintiff and other members of the Class were ignorant of their falsity, and believed them to be true. Had Plaintiff and the other members of the Class and the marketplace known the truth regarding the problems that GE HealthCare was experiencing, which were not disclosed by Defendants, Plaintiff and other members of the Class would not have purchased or otherwise acquired their GE HealthCare securities, or, if they had acquired such securities during the Class Period, they would not have done so at the artificially inflated prices which they paid.

50. By virtue of the foregoing, Defendants violated Section 10(b) of the Exchange Act and Rule 10b-5 promulgated thereunder.

51. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff and the other members of the Class suffered damages in connection with their respective purchases and sales of the Company's securities during the Class Period.

SECOND CLAIM

Violation of Section 20(a) of The Exchange Act

Against the Individual Defendants

52. Plaintiff repeats and re-alleges each and every allegation contained above as if fully set forth herein.

53. Individual Defendants acted as controlling persons of GE HealthCare within the meaning of Section 20(a) of the Exchange Act as alleged herein. By virtue of their high-level positions and their ownership and contractual rights, participation in, and/or awareness of the Company's operations and intimate knowledge of the false financial statements filed by the Company with the SEC and disseminated to the investing public, Individual Defendants had the power to influence and control and did influence and control, directly or indirectly, the decision-making of the Company, including the content and dissemination of the various statements which Plaintiff contends are false and misleading. Individual Defendants were provided with or had unlimited access to copies of the Company's reports, press releases, public filings, and other statements alleged by Plaintiff to be misleading prior to and/or shortly after these statements were issued and had the ability to prevent the issuance of the statements or cause the statements to be corrected.

54. In particular, Individual Defendants had direct and supervisory involvement in the day-to-day operations of the Company and, therefore, had the power to control or influence the particular transactions giving rise to the securities violations as alleged herein, and exercised the same.

55. As set forth above, GE HealthCare and Individual Defendants each violated Section 10(b) and Rule 10b-5 by their acts and omissions as alleged in this Complaint. By virtue of their position as controlling persons, Individual Defendants are liable pursuant to Section 20(a) of the Exchange Act. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff and other members of the Class suffered damages in connection with their purchases of the Company's securities during the Class Period.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief and judgment, as follows:

- (a) Determining that this action is a proper class action under Rule 23 of the Federal Rules of Civil Procedure;
- (b) Awarding compensatory damages in favor of Plaintiff and the other Class members against all defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;
- (c) Awarding Plaintiff and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and
- (d) Such other and further relief as the Court may deem just and proper.

JURY TRIAL DEMANDED

Plaintiff hereby demands a trial by jury.

Dated: ___, 2026

GLANCY PRONGAY WOLKE & ROTTER LLP

By: _____
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