



SUPPLIER CODE OF CONDUCT

Background

The Device Technologies Group is committed to conducting its business and operations with the highest levels of integrity, honesty and ethical compliance.

In this policy, Device Technologies Group means Device Technologies Australia Pty Ltd, its associated entities and related bodies corporate in Australia, New Zealand, US, UK and Asia.

Scope

1. This Supplier Code of Conduct (**Supplier Code**) provides for certain requirements of any and all suppliers, vendors, business partners, service providers, contract manufacturers and sub-contractors (collectively, **Suppliers**) of the Device Technologies Group.
2. By supplying goods or services to the Device Technologies Group, *Suppliers* agree to follow the *Supplier Code*. This *Supplier Code* may be:
 - 2.1. From time-to-time, enforced and verified by audits to be conducted by the Device Technologies Group or an external party as appointed by the Device Technologies Group;
 - 2.2. Required to be evidenced by *Suppliers* through the production of policies, procedures or other documentation;
 - 2.3. Required to be acknowledged, approved, and signed by an authorised representative of *Suppliers*; and/or
 - 2.4. Included in *Supplier* agreements and purchase orders, respectively.

Compliance with Laws

3. At a minimum, *Suppliers* must comply with all applicable local, national and international laws and regulations that apply to the conduct of their business with the Device Technologies Group. *Suppliers* are required to have their own policies, procedures and monitoring in place to ensure compliance with this *Supplier Code*. In the event that a *Supplier* is held responsible for breaching the law, the *Supplier* must notify the Device Technologies Group immediately.
4. Local, national or international laws may include (but are not limited to):
 - Modern Slavery, Employment and Labour laws;
 - Anti-Bribery and Corruption laws;
 - Privacy laws;
 - Anti-trust (competition) and consumer protection laws;
 - Environmental protection laws; and
 - Medical device and other product laws and regulations.

Modern Slavery, Employment and Labour

5. The Device Technologies Group prohibits modern slavery and human trafficking. *Suppliers* of the Device Technologies Group must not engage in any activities that may qualify as modern slavery in any of their operations and *Suppliers* must only provide employment that is voluntary and freely chosen.
6. The Device Technologies Group acknowledges the importance of fundamental human rights and promoting an end to modern slavery. We are strongly committed to ensuring that the services we provide to our customers and patients are delivered in a way that respect the global standards of human rights. We acknowledge our responsibility towards ensuring that our operations and



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supply chains comply with accepted local and international standards, which are derived from the Modern Slavery Act 2018 (Cth) and the principles of the United Nations (UN) Global Compact.

For further information, refer to Device Technologies Group's **Modern Slavery & Human Rights Policy**.

Anti-bribery and Corruption

7. The Device Technologies Group has a zero-tolerance approach to bribery and corruption in all business dealings and in all countries and territories in which the Device Technologies Group operates.
8. *Suppliers* must keep accurate business records in full compliance with all relevant legal requirements and honestly report all transactions of and related to the *Supplier's* business. *Suppliers* must not make any direct or indirect payments or promises of payment to foreign government officials or others for inducing that individual in their position to obtain or retain business.
9. The Device Technologies Group prohibits secret commissions and other acts of corruption, including fraud, embezzlement, money laundering, extortion, nepotism, facilitation/grease payments, speed money, theft, falsification of records, kickbacks and other forms of influence peddling. *Suppliers* must ensure that they have appropriate measures in place to prevent these activities in their business.

For further information, refer to Device Technologies Group's **Anti-bribery and Corruption Policy**.

Gifts and Entertainment

10. The Device Technologies Group does not accept gifts or entertainment that may, or may be seen to, influence business decisions. All Device Technologies Group staff are expected to read and comply with the Device Technologies Group Gifts and Entertainment policy.
11. *Suppliers* must not provide gifts or entertainment to Device Technologies Group staff that could be seen as an inducement, bribe, unreasonable, outside of the ordinary course of business or otherwise violate applicable laws and/or regulations.

For further information, refer to Device Technologies Group's **Gifts and Entertainment Policy**.

Conflicts of interest

12. *Suppliers* must ensure that there are no conflicts of interest and/or immediately disclose to the Device Technologies Group any appearance of conflicts of interest in their business dealings. *Suppliers* must not deal directly with any employee of Device Technologies Group that may have, or be associated with someone that may have, a financial or other interest in the *Supplier* without first notifying the Device Technologies Group and obtaining documented approval.

Privacy

13. The Device Technologies Group is committed to complying with all applicable data and privacy protection laws. *Suppliers* are expected to act responsibly and adhere to all relevant local, national and international laws regarding protection of personal information. If there is any breach which under any applicable data or privacy protection laws may result in the requirement for a

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data breach notification to a Regulator or patient, the supplier must notify Device Technologies immediately.

For further information, refer to Device Technologies Group's **Privacy Policy**.

Anti-trust and Consumer Protection

14. *Suppliers* must commit to the principle of free competition and not engage in collusive bidding, price fixing or other unfair trade practices. Further, *Suppliers* must ensure consumer protection laws are adhered to for the target market/s.

For further information, refer to Device Technologies Group's **Fair Trading Principles**.

Environment and Sustainability

15. *Suppliers* to the Device Technologies Group are expected to operate in a sustainable and environmentally responsible manner. As such, every effort should be made to:

- Identify the primary sources of emission and commit to reducing their carbon footprint; and
- Work to continuously reduce environmental impacts of their business including material sourcing and consumption, waste generation, wastewater discharge and air emissions.

For further information, refer to Device Technologies Group's **Environmental Policy**.

Sub-contracting

16. *Suppliers* must ensure that all sub-contractors meet with the requirements set out in this Code. If a deviation is identified, *Suppliers* must take appropriate remedial action and notify the Device Technologies Group.

Non-Compliance

17. Where serious issues have been identified, the Device Technologies Group expects *Suppliers* to report the matter immediately - including the approach to investigation and a remediation plan. We may request you to act immediately where we believe it is necessary and may take action to report the breach to relevant authorities or governing bodies.

18. The Device Technologies Group will make every effort to assist you in remediating the issues where possible. However, the Device Technologies Group will consider termination if *Suppliers* do not notify us of a breach of the *Supplier Code*, refuses to co-operate with an investigation or engage in remediation, makes no progress in remediation plan, or repeatedly breaches our *Supplier Code*.

Relevant Further Information

19. Deviations to this *Supplier Code* should be reported to Device Technologies Group 'Head of Group Business Development'.



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20. *Suppliers* are reminded that the Device Technologies Whistleblower program is also available to encourage reporting of Reportable Conduct that is of legitimate concern by providing a convenient and safe reporting mechanism, and protection for people who make disclosures.

For further information, refer to Device Technologies Group's **Whistleblower Policy**.

Certification

21. You agree to provide information to the Device Technologies Group in relation to the obligations articulated in the *Supplier Code* and confirm Device Technologies Group's right to request relevant information and conduct audits to meet those obligations.
22. You warrant that any information supplied is true and accurate and may be relied upon by the Device Technologies Group for the purpose of any regulatory requirements.

*This Supplier Code of Conduct and underpinning Device Technologies Group Policies can be found at: **www.device.com.au***

Supplier Name: _____

Position of Authorised Signatory: _____

Authorised Signatory Name: _____

Signature: _____

Date: _____