



SUPPLIER

CODE OF CONDUCT

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SUPPLIER CODE OF CONDUCT

Integer’s Vision is to enhance the lives of patients worldwide by being our customers’ partner of choice for innovative medical technologies and services. To maintain our position as a leading medical contract development and manufacturing organization (CDMO), we must have talented associates who are passionate about delivering excellence for our customers and their patients. We hold our Suppliers to these same high standards as they assist in delivering our scalable, vertical integration and supply chain needs.

We believe a strong relationship with our Suppliers is the key to ensuring our company’s success. The Supplier Code of Conduct communicates our expectations to Integer’s valued and vital business partners throughout our supply chain. We expect our Suppliers to operate in accordance with our Supplier Code of Conduct and comply with all applicable laws, rules, and regulations in the countries where we operate. Suppliers are also required to disseminate these same expectations throughout their supply chains and monitor compliance. If there is a conflict between a local law and our Supplier Code of Conduct, the higher standard shall apply.



ETHICS

Supply Chain Security

Supplier agrees it will comply with all applicable supply chain security requirements of the European Union (EU), United States (U.S.), and any other applicable jurisdiction, including by way of example the U.S. Customs and Border Protection Trade Partnership Against Terrorism (CTPAT).

Ethical Behavior

Integer expects our Suppliers to build a culture of ethical behavior and conduct daily business in an open and honest manner. Suppliers must avoid any conflicts of interest. Suppliers will abide by all anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), anti-money laundering and anti-bribery laws, anti-trust and fair competition laws, exercise due diligence to prevent and detect criminal conduct, and have a written code of business ethics and conduct (such as described in the Supplier's employee handbook or Code of Conduct). The Supplier represents and warrants that it will comply, and it will require that anyone acting on its behalf to comply, with all applicable anti-corruption laws and rules. That compliance will include, among other things, the following: Supplier and anyone acting on its behalf will not give, offer, agree, promise to give, or authorize the direct or indirect giving, of any money or other thing of value to anyone to induce or reward favorable action, forbearance from action, or the exercise of influence.

Gift Policy

Suppliers are required to adhere to Integer's Gifts, Gratuities and Business Entertainment policy ([Integer | Code of Conduct](#)). Suppliers shall not provide any gifts, gratuities or favors to an Integer Associate where the acceptance could create the appearance of a conflict of interest. This includes promising, offering, authorizing, giving, or accepting anything of value either directly or indirectly through a third party, in order to obtain or retain business or to gain any improper advantage.

Confidentiality

Suppliers shall not disclose any Integer confidential or proprietary information to any third party except as otherwise described in a Non-Disclosure Agreement (NDA) between Integer and Supplier and will take appropriate precautions to ensure confidential or sensitive business information is disclosed internally on a need-to-know basis only.

Data Protection and Privacy

Suppliers shall comply with all privacy and information security laws and regulations relating to the collection, storage, processing, transmitting, and sharing of data belonging to Suppliers, customers, and employees. Data protection policies should include protecting information from damage, loss, or corruption.



Intellectual Property

Suppliers must respect Integer's intellectual property rights, including processes, information, technology, and customer information. Suppliers are required to take all reasonable efforts and necessary precautions to safeguard their knowledge and protect intellectual property rights.

Conflict Minerals

Suppliers are expected to have appropriate due diligence mechanisms, related policies, and processes in accordance with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as any additional applicable standards.

Suppliers shall comply and enable Integer to comply with all its obligations under Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, and all other similar laws or regulations related to Conflict Minerals including the European Conflict Minerals 2017/821 Regulation as applicable. Suppliers shall review and comply with requirements documented in the Integer [EHSS Conflict Minerals Policy](#).

Import and Export Laws

Suppliers must fully comply with all laws and regulations that regulate imports or exports of products, software, and technology. Suppliers are also required to regulate business with countries, entities and individuals that are subject to embargoes or sanctions.

Export Control

Suppliers must represent and warrant that it will comply with all applicable economic sanctions, export control, and anti-boycott laws of the EU, U.S., and any other applicable jurisdiction, including by way of example the U.S. Export Administration Regulations, U.S. economic sanctions programs, and the economic sanctions rules of the European Union. The Supplier represents and warrants that neither it nor any parent, subsidiary, affiliate, or associated entity, personnel or contracted service providers is included on any restricted party list maintained by the EU, U.S., or other relevant government authority, including by way of example the Specially Designated Nationals List and Foreign Sanctions Evaders List administered by the U.S. Office of Foreign Assets Control (OFAC), and the consolidated list of persons subject to EU financial sanctions, and is not owned or controlled by a restricted party. The Supplier will not do business with or provide goods or services, directly or indirectly, to anyone on the restricted party lists or to any country with which trade is prohibited by U.S., EU, or other applicable sanctions.

Import Control

Suppliers must agree to comply with all applicable import rules and regulations of the EU, U.S., and any other applicable jurisdiction, including by way of example the U.S. Import Regulations as they relate to the reporting of the U.S. Harmonized Tariff Schedule (HTS) classification, valuation, country of origin or other import trade data elements. Suppliers will rely on the trade data information provided by Integer. Under no circumstances can Suppliers change or modify any trade data information without Integer's prior written consent.



SOCIAL RESPONSIBILITY

Nondiscrimination

Suppliers may not engage in or tolerate any discriminatory conduct or harassment against any person on any basis, including age, pregnancy and maternity, marital status, race, color, ethnicity, national origin, religion, disability, gender, sexual orientation, gender identity and expression, nationality, veteran status, union membership, political affiliation or any other class protected by law. Suppliers shall be committed to a workplace free of harassment and discrimination included during the hiring process including employment practices such as wages, promotions, and access to training. Suppliers will not discriminate or retaliate against workers who raise grievances or concerns in good faith.

Forced Labor and Human Trafficking

Suppliers must ensure that all work is on a voluntary basis. Integer prohibits the use of any forced labor, including trafficked, bonded, slave, indentured, or prison labor in a Supplier's facilities and operations or in any third-party employment agencies. Prohibited actions include transporting, harboring, recruiting, transferring, or receiving workers by means of threat, force, coercion, abduction, or fraud. During the hiring process, Suppliers are required to provide workers with a written employment agreement in the worker's native language that describes the terms and conditions of employment. Suppliers or Supplier's employment agencies may not hold, destroy, conceal, confiscate, or deny access to an employee's own identity or immigration documents such as government issued identification, passports, work permits, visas, etc. Supplier agrees it will comply with all applicable forced labor prohibitions and restrictions of the EU, U.S., and any other applicable jurisdiction, including by way of example U.S. law prohibits the importation of goods mined, produced, or manufactured wholly or in part with forced labor. To refute a forced labor claim, Supplier further agrees that upon request to provide documentation supporting manufacturing, processing, and material sourcing.

Integer requires all Suppliers to comply with prohibitions on forced labor, including but not limited to the United Nations (UN) Anti-Slave Labor, EU Ban on Forced Labor, and the U.S. Uyghur Forced Labor Prevention Act (UFLPA) legislation. Suppliers are required to carefully monitor their entire supply chain to ensure that there is no forced labor, and specifically that no materials are sourced/produced in whole or in part from the Uyghur region of China.

Child Labor

Suppliers must conform to all applicable child labor laws and employ only workers who meet the minimum legal age requirement. A child is any person under the age of 15, or under the minimum age for employment in the country where the work will be performed, whichever is greater. To ensure compliance, Suppliers must create and maintain official and verifiable documentation of each of its workers' ages.

Wages, Benefits and Working Hours

Suppliers must conform to all applicable laws with regards to minimum wages, overtime, working hours, break periods and mandated benefits. All overtime must be voluntary and compensation for overtime hours shall comply with local laws.

Freedom of Association and Collective Bargaining

Suppliers must recognize, respect, and protect workers' lawful rights to freely associate and collectively bargain in accordance with applicable laws and regulations and without fear of retaliation.

Harassment-Free Environment

All workers have a right to a workplace free of harassment and abuse. We require our Suppliers to prohibit all types of harassment including, but not limited to physical, verbal, psychological and sexual harassment. Suppliers shall provide a means to report any harassing or inappropriate behavior without fear of retaliation.



HEALTH & SAFETY

Having a safe workplace is one of the most important benefits that an employer can offer to employees. Suppliers are expected to provide and sustain a safe working environment for all employees and their visitors. To ensure this, Suppliers must follow the strict safety and security rules and practices as required by applicable laws and regulations in the countries in which they operate.

Occupational Safety

Suppliers shall proactively Identify workplace safety hazards and implement effective controls to reduce, or eliminate where possible, risk of injury and illness. When safety hazards cannot be adequately controlled, employees are to be provided with appropriate, well maintained, personal protective equipment and education materials about risks due to these hazards.

Occupational Injury and Illness

Suppliers shall put a system in place to prevent, record, manage, track and report occupational injuries and illnesses. Suppliers will investigate near-miss or workplace injuries and illnesses and implement corrective actions to eliminate the cause of any further occurrences.

Health and Safety Communication

Suppliers shall provide employees health and safety training in the worker's native language. Health and safety information shall be clearly posted in the facility and in a location identifiable and assessable to their employees.

Machine Safeguards

All machines and equipment shall be reviewed for safety hazards and Suppliers will equip and maintain required safeguard devices (i.e., physical barriers, guards, locks, gates, presence sensing, restraints, etc.) to prevent harm while equipment is in use.

Emergency Preparedness and Response

Suppliers shall identify potential emergency situations and events and implement response procedures to minimize harm to its employees, property, and environment. Response procedures should include emergency reporting, employee notification and evacuation procedures and worker training.

Housing Facilities

Suppliers must meet reasonable and legal standards when providing housing facilities to associates. Suppliers must follow legal requirements for the amount of living space in sleeping quarters, clean toilet facilities, potable water, and sanitary food preparation and eating facilities. Living spaces must be distinct from the factory/ production area and separated by gender.



ENVIRONMENTAL STEWARDSHIP

Environmental Stewardship promotes environmental excellence and is critical to being a world-class organization, producing world-class products. Suppliers shall identify and minimize its adverse effects on the communities and environment in which they operate and safeguard the health and safety of the public.

Environmental Permits and Reporting

All required Environmental permits and registrations are to be obtained, maintained, and kept current and their operational, monitoring and reporting requirements are to be followed as required by applicable laws and regulations in the countries in which they operate.

Conservation of Natural Resources

Suppliers shall optimize and reduce use of natural resources and materials within business operations and apply a continuous improvement approach to enhance environmental performance and reduce their environmental footprint. Suppliers may be asked to provide information on their use of natural resources and environmental footprint.

Wastewater and Solid Waste Management

Suppliers must monitor, treat, control, manage, and properly dispose of wastewater and solid waste. Suppliers must comply with all applicable waste management laws and regulations.

Hazardous Waste

Suppliers must create and maintain systems to ensure the safe handling, movement, storage, disposal, and management of hazardous materials. Suppliers are expected to train associates on how to handle hazardous material.

Greenhouse Gas Emissions Management

Suppliers shall identify, manage, and reduce greenhouse gas emissions from its operations. Suppliers shall set targets, monitor progress, and reduce its emissions through conservation, use of clean energy and other sustainability practices with a goal of net zero emissions.

International Standards for Phytosanitary Measures (ISPM 15)

To prevent the international transport and spread of disease and insects that could negatively affect plants or ecosystems, Suppliers agree to properly train all cargo handling staff with regards to this standard. Suppliers shall ensure all wood packaging materials (wood pallets and other wood packaging items) are properly treated and stamped in accordance with the International Standards for Phytosanitary Measures (ISPM 15) for international trade.



EFFECTS OF NON-COMPLIANCE

Part of conducting business with Integer includes compliance with this Supplier Code of Conduct. Integer requires Suppliers and their subcontractors to maintain their own program and internal control system having documentation to verify compliance with the Integer Supplier Code of Conduct and applicable laws and regulations, including full cooperation with any Government agencies responsible for audits, investigations, or corrective actions. We reserve the right to request to audit and inspect Supplier’s facilities, operations, and records at any time to ensure compliance. Integer may terminate business with a supplier who fails to adhere to the requirements of this Supplier Code of Conduct.



REPORTING

All legal, ethical and compliance questions regarding Integer’s Supplier Code of Conduct can be addressed to compliance@integer.com.

Any violations of Integer’s Supplier Code of Conduct shall be reported by one of the following methods:

Direct Line Website: [Reporting](#)

Direct Line: For the US, dial 1-855-846-6576. For all other countries, dial as directed below. Some countries may prompt you to enter a number after dialing; if this occurs, dual 1-855-846-6576.

Country	Country Toll-Free Access Code	At English Prompt Dial
China	Northern Mandarin 108-710	1-855-846-6576
	North 108-888	
	Southern Mandarin 108-10	
	Southern 10-811	
Dominican Republic	1-800-225-5288 or 1-800-872-2881	1-855-846-6576
Ireland	0-800-1819381	1-855-846-6576
Malaysia	1-800-81-8258	N/A
Mexico	001-844-451-7910	N/A
Switzerland	0-800-890011	1-855-846-6576
United States	1-855-846-6576	N/A
Uruguay	000-410	1-855-846-6576

In the fulfillment of any Order identified as a U.S. government subcontract Order, any credible evidence of violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil U.S. False Claims Act (31 U.S.C. 3729-3733) shall be reported to the U.S. Office of the Inspector General (OIG).



Integer | Global Corporate Headquarters

5830 Granite Parkway,
Suite 1150 Plano, TX 75024
+ 1.833.722.3657
compliance@integer.net
[Integer.net](https://integer.net)