

## TELEFLEX LABOUR STANDARDS ASSURANCE POLICY

### OVERVIEW

Teleflex is committed to ensuring compliance to recognized standards which have been established by organizations such as the International Labour Organization (ILO) and the U.S. Department of Labour among others. Teleflex shall commit to continuous improvement in an effort to achieve full compliance to the standards within its own facilities as well as its supply chain. Teleflex is committed to meeting and ultimately exceeding the minimum standards as outlined in this policy and related procedure.

Details are spelled out in the following sections:

- LABOUR AND HUMAN RIGHTS
- HEALTH & SAFETY
- THE ENVIRONMENT
- ETHICS
- MANAGEMENT SYSTEMS

### SCOPE

This policy applies to all Teleflex locations. Teleflex shall also strive to ensure that its suppliers adhere to the minimum standards which are defined within this policy. Regional differences in Labour standards shall be addressed on a case by case basis; however, this policy is expected to cover the requirements for global compliance.

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## POLICY

This policy and its accompanying procedure shall be used as its guiding Labour Standards Assurance document, outlining a series of minimum requirements which are based on the fifteen (15) actions identified as part of the Labour Standards Assurance System (LSAS) which requires that minimum working conditions in each of its facilities and, to the extent possible, throughout its supply chain, are safe, that all employees are treated with respect and dignity, and that sourcing and manufacturing processes are managed in an environmentally and socially responsible fashion. The most fundamental aspect of these objectives is the need to understand and comply with the applicable laws, rules, and regulations of the legal federal, state and local jurisdictions in which an organization operates. This policy draws upon internationally recognized standards and best practices in order to advance social and environmental responsibility. Teleflex is, to the best of its ability, committed to developing and implementing those relevant policies and procedures that will facilitate the execution of this standard. Likewise, Teleflex expects that its suppliers will also strive to meet or exceed the standards and practices described within this document.

Teleflex references various resources and examples in developing this policy, including the Electronic Industry Citizenship Coalition (EICC) Code, the International Labour Organization Standards (ILO), the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) guidelines, and the Ethical Trading Initiative (ETI). Teleflex will continue to develop and/or maintain detailed standards that serve to clarify the manner in which we will operate our business relative to this policy along with expectations for compliance among our suppliers and other affected partners.

## 1. LABOUR & HUMAN RIGHTS

Teleflex and its suppliers must uphold the human rights of all employees, whether full-time, part-time, temporary, student, contract or other employment status, and treat them with dignity consistent with standards and practices recognized by the international community.

### 1.1. Anti-Discrimination

Teleflex and its suppliers will not discriminate against any employee based on family status, civil status, race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, marital status, veteran status, genetic disposition or carrier status, or any other legally protected basis, in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline and termination. Teleflex and its suppliers will not discriminate against pregnant employees or require a pregnancy test except where required by applicable laws or regulations or deemed prudent for protecting individual well-being or overall workplace safety. In addition, Teleflex and its suppliers will not utilize medical testing of employees or potential employees for discriminatory purposes. Teleflex and its suppliers may require certain medical testing where specified by applicable law or regulation or deemed prudent for protecting individual well-being or overall workplace safety.

## **1.2.Anti-harassment/Fair Treatment**

Teleflex and its suppliers must be committed to a workplace free of harassment. Teleflex and its suppliers will not threaten employees with, or subject them to inappropriate behavior or practices, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse or unreasonable restrictions on entering or exiting company provided facilities.

## **1.3.Prevention of Involuntary Labour**

Teleflex and its suppliers will not use any form of forced, bonded, indentured, or prison Labour. All work must be voluntary and employees will be free to leave work or terminate their employment. Employees must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Teleflex and its suppliers will ensure that third party Labour agencies providing employees are compliant with the provisions of this policy and applicable laws and regulations. Teleflex and its suppliers will ensure that contracts for both direct and contract employees clearly convey the conditions of employment in a language understood by the employee.

## **1.4.Prevention of Underage Labour**

Child Labour is strictly prohibited. The minimum age for employment or work will be 16 years of age. No person between the ages of 16 and 18 will be employed unless such employment is in compliance with the health, safety and morals provisions of the International Labour Organization (“ILO”) Convention No. 138.

## **1.5.Working Hours**

Work weeks shall not exceed the maximum set by law within the operating region.

## **1.6.Wages and Benefits**

Teleflex and its suppliers must pay all employees at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at the rate required by applicable laws and regulations at a minimum. Teleflex and its suppliers will not use deductions from wages as a disciplinary measure, except where permissible by law and then only after documented due process indicates such measures are warranted and appropriate. Employees must be paid in a timely manner, and the basis on which employees are being paid must be clearly conveyed to employees in a timely manner.

## **1.7.Freedom of Association**

Teleflex and its suppliers must respect the right of employees to associate freely, form and join employees organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Teleflex and its suppliers will not specify non-union membership as a condition of employment. Teleflex and its suppliers must protect against acts of interference with the establishment, function, or administration of employees’ organizations in accordance with applicable laws and regulations. All employees must be able to openly present grievances concerning the work environment or management practices without fear of reprisal.

## 2. ENVIRONMENTAL HEALTH & SAFETY

### 2.1.Vision

Teleflex's EHS vision is that Teleflex cause Zero Harm to people and environment.

### 2.2.Purpose

It is Teleflex's policy that safety and health of personnel and environmental stewardship should be considered values in the conduct of our operations and we remain fully committed to complying with all relevant EHS legislation and the achievement of our vision.

### 2.3.Scope

This policy applies to all Teleflex personnel and sites globally. EHS is deemed to include the protection of people from occupational health and industrial hygiene hazards and exposures.

### 2.4.Responsibility

All personnel are responsible for EHS within their work activities and are required to take responsibility for their overall health and well-being and to comply with all EHS related policies and procedures. All Teleflex personnel have responsibilities for implementing the principles and practices embedded in this policy. The Teleflex Corporate EHS function is responsible for fostering and supporting a culture that promotes positive EHS performance.

### 2.5.Review

This policy will be reviewed on an annual basis to assess that it is relevant to Teleflex operations, where necessary it shall be revised and updated.

### 2.6.Policy

Reflecting its commitment to excellence in EHS management, and our core value of building trust, our objectives are to:

- Interact and communicate openly with stakeholders to maintain and coordinate our commitment to EHS;
- Provide a structure, encompassing an open and just culture across EHS Management with access to whistleblower protection as per the Code of Ethics through reporting at; [www.TeleflexEthicsLine.com](http://www.TeleflexEthicsLine.com)
- Drive effective EHS management across the business, including the delegation of responsibility and accountability throughout all levels of management and via the appointment of competent EHS professionals;
- Engage and involve personnel and their representatives in our EHS Management Systems and continual improvement of those systems;
- Ensure that EHS management performance is monitored, evaluated and measured to achieve continuous improvement.

- Promote the development of a positive EHS culture based on fairness, trust and co-operation, where all personnel are encouraged to report all EHS deficiencies and/or breaches in compliance, in a prompt and confidential manner;
- Ensure that measures to deal with all emergency situations are suitable to the business requirements;
- Promote the health & wellness of our personnel by identifying and controlling workplace related health risks, encouraging personnel to be proactive about their own health through supportive activities, and ensuring that EHS information is available to all personnel;
- Provide arrangements to continually identify, control and reduce EHS risks, in accordance with legal requirements, and to protect people from personal injury, protect business assets and the environment, and minimize unplanned business interruption;
- Exchange knowledge and EHS best-practice across all Teleflex businesses while maintaining dialogue with industry associations, and regulatory bodies to promote best practice based on sound science and our experiences of risk;
- Ensure that all personnel are suitably trained to carry out their particular work brief in a competent and professional manner while acknowledging that failure to comply with any relevant EHS duty which they are directly responsible or accountable for may be considered a breach of conduct and could potentially lead to disciplinary action being taken;
- Encourage the adoption of similar principles by our extended supply chain and partners.

Full details of the Teleflex EH&S Programme may be found in our intranet site

<https://home.teleflex.com/Intranet/TeleflexIncorporated/departments/EnvironmentalHealth&Safety/GlobalEHS.html>

### **3. ETHICS**

Teleflex and its suppliers must be committed to the highest standards of ethical conduct when dealing with employees, suppliers, and customers. Teleflex has adopted a zero tolerance policy regarding violations of certain business ethics and will take immediate and appropriate measures to address non-compliance with stated requirements and expectations.

Highlights are included below. Additionally, Teleflex publishes its comprehensive code of ethics policies in its Global Knowledge Network (GKN). The following documents are posted on the GKN and are accessible to all Teleflex employees:

Business Ethics & Compliance Program of Teleflex Incorporated

Code Of Ethics For Chief Executive Officer & Senior Financial Officers

#### **3.1. Corruption, Extortion, or Embezzlement**

Corruption, extortion and embezzlement, in any form, are strictly prohibited. Teleflex and its suppliers will not engage in corruption, extortion or embezzlement in any form. Violations of this prohibition may result in immediate termination as a Teleflex employee or supplier. Teleflex reserves the right to take legal action in connection with any violation of these prohibitions.

#### **3.2. Disclosure of Information**

Teleflex and its suppliers must disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws and regulations and prevailing industry practices. Falsification of records or intentional misrepresentation of conditions or practices is unacceptable and will result in appropriate corrective action.

#### **3.3. Privacy**

Teleflex and its suppliers must be committed to protecting the reasonable privacy expectation of personal information within all levels of business including suppliers, customers, consumers and employees. Teleflex and its suppliers must comply with privacy and information security laws and regulatory requirements wherever personal information is collected, stored, processed, transferred and shared.

#### **3.4. No Improper Advantage**

Teleflex and its suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage, including personal fees, gifts or favors. Teleflex is sensitive to even the potential appearance of improper interactions. Teleflex employees who fail to comply with these requirements will be promptly disciplined as appropriate, up to and including termination. Suppliers failing to comply with this guidance may be disqualified from conducting business with Teleflex.

#### **3.5. Fair Business, Advertising, and Competition**

Teleflex and its suppliers must uphold fair business standards in advertising, sales and competition.

### **3.6. Whistleblower Protection and Anonymous Complaints**

Teleflex and its suppliers must ensure the protection of whistleblower confidentiality and prohibit retaliation against employees who participate in such programs in good faith or refuse an order that is in violation of their respective Codes of Conduct. Teleflex offers an anonymous complaint mechanism for employees to report actual or perceived accounting or auditing improprieties in accordance with local laws and regulations.

### **3.7. Community Engagement**

Teleflex and its suppliers are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

### **3.8. Supplier Diversity**

Teleflex has established processes and practices that establish a fair, open and inclusive business environment that ensures a diverse supply chain of capable, qualified business partners. Examples include a Supplier Diversity statement on the Teleflex.com public website as well as internal policies and work instructions outlining requirements. For more information, visit Teleflex.com.

### **3.9. Protection of Intellectual Property**

Teleflex is committed to protecting intellectual property rights and safeguarding customer, supplier and company internal information. Teleflex utilizes confidentiality agreements when necessary to protect intellectual property rights of all parties.

### **3.10. Responsible Sourcing of Materials**

Teleflex and its suppliers must take all reasonable measures to assure that conflict minerals are not supplied nor used in the manufacturing of parts of products. Conflict minerals include, but are not limited to, tin, tantalum tungsten and gold originating from the Democratic Republic of the Congo and adjoining countries or other regions where the purchase of specific minerals may benefit groups that perpetuate the abuse of serious human rights. Teleflex and its suppliers will practice an appropriate level of due diligence to ascertain the origin of conflict minerals. For more information, visit Teleflex.com. Additional related policies are available via the company intranet (GKN).

## **4. MANAGEMENT SYSTEMS**

Teleflex is committed to establishing a management system designed to 1) ensure compliance with this policy and applicable laws and regulations; 2) identify and mitigate related operational risks; and 3) facilitate continuous improvement. The management system shall address the following elements:

### **4.1. Company Commitment**

This policy shall be communicated to Teleflex employees via email and/or internal posting on the company intranet "Global Knowledge Network" (GKN) and endorsed by Teleflex Executive Management.



#### **4.2. Management Accountability and Responsibility**

Teleflex Management is committed to supporting this policy. The Vice Presidents of Global Procurement and Human Resources as well as the Director of Safety and Environmental Affairs are jointly responsible for ensuring implementation, compliance and periodic review of the policy.

#### **4.3. Legal Requirements**

This policy and related procedures are reviewed, monitored and endorsed by the Teleflex Legal team, which is responsible for interpreting applicable laws and regulations and the additional requirements imposed by this policy.

#### **4.4. Audits and Assessments**

Periodic self-evaluations, Corporate Compliance Assessments and/or third party reviews shall ensure suppliers' compliance to this policy. This may include scheduling supplier audits in order to review suppliers' Labour standards assurance systems.

#### **4.5. Corrective Action Process**

Teleflex is committed to developing a procedure for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation or review. This process may include specific remedies if the responsible party does not complete the defined corrective actions in a timely and acceptable manner.

#### **4.6. Documentation and Records**

Teleflex shall establish a method of documenting and recording compliance, EHS, supplier and employee data as required by this policy. Teleflex will put in place the systems and process to ensure that it complies with GDPR legislation.

## 5. REFERENCES

Please refer to the following websites for information pertaining to standards outlined within this policy:

Eco Management & Audit System [www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)

Electronic Industry Code of Conduct, October 2004  
[www.hp.com/hpinfo/globalcitizenship/environment/pdf/supcode.pdf](http://www.hp.com/hpinfo/globalcitizenship/environment/pdf/supcode.pdf)

Ethical Trading Initiative [www.ethicaltrade.org/](http://www.ethicaltrade.org/)

ILO Code of Practice in Safety and Health  
[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO International Labour Standards  
[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

ISO 14001 [www.iso.org](http://www.iso.org)

National Fire Protection Agency [www.nfpa.org/catalog/home/AboutNFPA/index.asp](http://www.nfpa.org/catalog/home/AboutNFPA/index.asp)

OECD Guidelines for Multinational Enterprises [www.oecd.org](http://www.oecd.org)

OHSAS 18001 [www.bsi-global.com/index.xalter](http://www.bsi-global.com/index.xalter)

SA 8000 [www.cepaa.org/](http://www.cepaa.org/)

SAI [www.sa-intl.org](http://www.sa-intl.org)

United Nations Convention Against Corruption  
[www.unodc.org/unodc/en/crime\\_convention\\_corruption.html](http://www.unodc.org/unodc/en/crime_convention_corruption.html)

United Nations Global Compact [www.unglobalcompact.org](http://www.unglobalcompact.org)

Universal Declaration of Human Rights [www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

UN Norms on the Responsibilities of Transnational Corporations and other Business Enterprises with Regard to Human Rights [www.ohchr.org](http://www.ohchr.org)