

Supplier Code of Conduct



Eakin Healthcare is a family-owned business based in Northern Ireland, manufacturing and supplying medical devices for ostomy, wound, respiratory and surgical needs.

Family-owned for nearly 50 years, our people have grown this organisation organically and through acquisitions, united by a passion for caring.

Our Vision

To improve healthcare outcomes for people by delivering trusted solutions in focused therapeutic areas within our chosen global markets

Our Values

OUTCOME FOCUSED

INTEGRITY

SAFETY

QUALITY

PEOPLE & PLANET

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Executive Summary

The Eakin Healthcare 'Supplier Code of Conduct' is based on company-wide, requirements and processes to ensure the effective establishment of sustainability standards across all countries of operation.

- ❖ Sustainability is integral to Eakin Healthcare's values and is an important part of our business strategy, which is integrated into our processes.
- ❖ A supply chain focused on sustainability is essential and Eakin Healthcare have developed a Sustainability Strategy & Environmental plan. We need your support as a partner to implement the Supplier Code of Conduct, which includes environmental performance, as outlined in the Environment & Sustainability section on page 5.
- ❖ Eakin Healthcare's group-wide Human Rights Position underscores its efforts to uphold internationally recognised principles in the areas of human rights and working conditions.
- ❖ Our Employee Code of Conduct outlines key legal areas where the ethically and legally compliant behavior of Eakin Healthcare's employees is of utmost importance to the company's well-being.

All these activities demonstrate how Eakin Healthcare assumes its responsibility concerning ethical, social and environmental standards and how the Eakin Group companies put into practice the principles of sustainable development in their daily operations. Thus ethical, social and ecological as well as additional quality assurance and risk minimisation principles are anchored in Eakin Healthcare's procurement and manufacturing processes.

The principles expressed in this Supplier Code of Conduct comprise an important component of supplier selection and evaluation. Moreover, we expect our suppliers to ensure they replicate these standards all the way down the supply chain. If a supplier is in breach of these principles and, cannot agree on an improvement plan or does not implement it, Eakin Healthcare reserves the right to redetermine the continuation of the commercial relationship.

This Supplier Code of Conduct is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how these principles should be practiced in day-to-day business including the advancement of efforts to contribute to the better health and wellbeing of people, animals, plants and the environment.

Environmental Performance

Eakin Healthcare expects its partners to act in accordance with all applicable statutory and international standards regarding environmental protection in order to minimise adverse environmental impacts and make continual improvements in environmental protection, encouraging their supply base to do the same.

We need your contribution, as a partner, to actively support us in implementing the Code of Conduct regarding environmental protection, ensuring that:

- You have a process that ensures compliance with statutory regulations and customer requirements governing operational and product-related environmental protection.
- All the approvals and/or licenses required for the operation of your sites are documented, implemented and regularly checked.
- You have a suitable management system (e.g. an ISO 14001-compliant or equivalent system) for environmental protection.
- You have rules, guidelines, internal standards or similar governing product related environmental protection, for example with regard to product design, restrictions on materials, labelling, information obligations, reuse, recycling, environmentally compatible product use, maintenance and disposal and, where applicable, measures for protection against hazardous substances, and you train your employees accordingly.
- You incorporate environmental considerations into all of your activities and are focused on developing and measuring sustainability performance in the supply chain, working to reduce waste, energy use and emissions.
- You use your best efforts to re-use and recycle throughout your operations and avail of environmentally-friendly technologies where possible.

Ethics

To meet social responsibilities, you shall conduct your business in an ethical manner and act with integrity. Ethical requirements include the following aspects:

Business Integrity

You shall not practice or tolerate any form of corruption, extortion, embezzlement or money laundering. You shall not offer or accept bribes or other unlawful incentives (e.g., 'facilitation payments') to or from business partners or government officials. You shall not offer to Eakin Healthcare employees any kind of gifts or personal benefit which could be perceived as a bribe. In all cases, gifts or entertainment shall not be offered to improperly influence a business relationship and must not violate applicable laws or ethical standards.

Conflict of Interest

You shall disclose to Eakin Healthcare any situation that could constitute a conflict of interest, such as Eakin Healthcare employees having professional, private and/or significant financial advantages or interests in any of your businesses.

Fair Competition

You will conduct business in line with fair competition and in accordance with all applicable anti-trust laws.

International Trade Controls

You must comply with export control regulations applicable to your business and provide accurate and truthful information about it to customs and other authorities when required.

Privacy & Intellectual Property

You shall safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

You shall not use Eakin Healthcare's name or marks or that of our affiliates or products in publicity or advertising without Eakin Healthcare's prior written consent.

Data Privacy & Data Protection

Your information systems that contain Eakin Healthcare's confidential information or data shall be appropriately managed and protected against unauthorised access, use, disclosure, modification or destruction. You shall collect personal information only for legitimate business purposes, use it in a legal, transparent and secure manner, share it only with those who are allowed access, protect it in accordance with security policies, retain it only for as long as necessary, and obligate third parties with access to personal information to protect it.

Animal Welfare

If applicable to your industry, alternatives to animal testing shall be used when such alternatives are scientifically valid and predictive so as not to compromise the quality or safety evaluations of Eakin Healthcare's products, and when they are acceptable to regulatory agencies. When animal testing is necessary, you shall minimise the number of animals used for testing. You shall be equally committed to conducting animal testing using the most humane scientifically valid protocol, which must meet study and regulatory requirements, and shall conduct tests only in accordance with all applicable laws.

Conflict Minerals

You shall ensure that products supplied to Eakin Healthcare do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses.

Identification of Concerns

You shall encourage and provide means for your employees to report concerns, complaints or potentially unlawful activities in the workplace without threat of reprisal, intimidation or harassment. Any report should be treated in a confidential manner. You shall investigate such reports and take corrective action if needed. You shall notify Eakin Healthcare of legal actions, administrative investigations or prosecutions that may affect the performance of Eakin Healthcare's business or that could potentially adversely affect yours and Eakin Healthcare's reputation.

If at any time you or one of your employees believes that an Eakin Healthcare employee has acted contrary to these principles, you or your employee is encouraged to report their concerns to Eakin Healthcare Human Resources Department at email address: info@eakinhealthcare.com

People & Labour

You shall protect the human rights of your employees and treat them with dignity and respect. This includes the following aspects:

Child Labour

We do not tolerate child labour in our supply chain. You must avoid any sort of child labour in your business operations consistent with the International Labour Organisation's (ILO) 2 core Labour standards and the United Nations Global Compact principles. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.

Freely Chosen Employment

We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in our supply chain. Bonded, indentured or involuntary prison labour also is not accepted. Practices such as withholding personal property, passports, wages, training certificates, work or any other document for inappropriate reasons are not acceptable.

Freedom of Association

You shall commit to an open and constructive dialogue with your employees and workers' representatives. In accordance with local laws, you must respect the rights of your employees to associate freely, form and join labour unions, seek representation, join works councils, and engage in collective bargaining. You shall not disadvantage employees who act as workers' representatives so that they can exercise their role without fear of reprisal or discrimination.

Working Time, Wages & Benefits

Working time for your employees shall not exceed the maximum set by the applicable national law and by ILO standards. Compensation shall be paid to employees regularly, in a timely manner and in full according to applicable laws and must comply with applicable national wage laws. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure shall not be permitted (this does not exclude the entitlement of damages on a contractual or legal basis). You are expected to provide your employees with fair and competitive compensation and benefits and to support equal pay for work of

equal value. It is recommended that you offer your employees ample training and educational opportunities.

Inclusion & Diversity

Equal treatment of all employees must be a fundamental principle of your corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as age, disability, ethnicity, family status, gender, gender expression, gender identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social origin, sexual orientation, union membership or any unlawful criterion under applicable law. You shall ensure that your employees are not harassed in any way.

Eakin Healthcare encourages you to provide an inclusive and supportive working environment by exercising diversity when it comes to your employees. Likewise, Eakin Healthcare encourages you to have an active Supplier Diversity Program by engaging with diverse-owned businesses.

Fair Treatment

You must provide your employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment. Furthermore, you are expected not to unfairly terminate any employment contract or without clear evidence specify that the termination of an employment contract, in relation to the working performance of an employee, as permitted by law. Employees may leave the employer freely provided they comply with advance notice specified by law. They shall be paid on time and in full for the work they have done prior to leaving according to applicable laws.

Local Community

To promote responsibility for the communities you operate in, you should listen to the concerns of local residents and provide for healthy and safe living conditions. The support of local job creation, local sourcing, education provisioning and infrastructure development is encouraged.

Health & Safety

You must comply with all applicable health and safety laws and regulations. We expect our suppliers to provide a safe and healthy workplace by providing training, personal protective equipment and information on health and safety matters. There should be continuous improvement of health and safety procedures to prevent and minimise injury of all employees.

Quality

You shall provide high-quality, safe and effective goods and services that are in full compliance with applicable laws and regulations. This comprises the following aspects:

Quality Requirements

You shall meet generally recognised quality standards or contractually agreed quality requirements and standards along with any additional requirements that are specified within Eakin Healthcare Quality Technical Agreement, in order to provide goods and services that consistently meet Eakin Healthcare's and its customers' needs, perform as warranted and are safe for their intended use. You shall immediately address all critical issues that have the potential to adversely affect the quality of goods and services. You must inform Eakin Healthcare about changes of the manufacturing or supply process that have the potential to impact the specification of goods and services provided.

Security & Anti-Counterfeiting Measures

You shall have good security practices across your supply chains. You shall assure the integrity of each shipment to Eakin Healthcare from its origin through to its destination.

You shall implement the necessary and appropriate measures in your area of responsibility to ensure that Eakin Healthcare products, their workable components or raw materials as well as the corresponding know-how do not end up in the hands of counterfeiters, smugglers, thieves or other unauthorised third parties and do not leave the legitimate supply chain. You shall promptly analyse the relationship with a third party if they obtain or are provided with evidence that they are inadvertently involved in the manufacturing or selling of counterfeit products via the actions of the third party, including products destined for export that are considered counterfeit products in their country of destination. Eakin Healthcare expects you to support the investigation and prosecution of any activities connected with counterfeit products.

Governance & Management Systems

You shall implement effective management systems and a governance structure to facilitate compliance with all applicable laws and promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

Legal & Other Requirements

You shall identify and comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognised standards. You shall also conform your practices to generally accepted industry standards, shall obtain, maintain and keep up-to-date all applicable permits, certificates, licenses and registrations, and shall operate in accordance with permit limitations and requirements at all times. These documents should be made available on request

Systems, Documentation & Evaluation

You shall develop, implement, use and maintain management systems and controls related to the content of this Supplier Code of Conduct. You shall maintain documentation necessary to demonstrate conformance with the principles outlined in this Code of Conduct.

Risk Management

You shall implement mechanisms to regularly identify, evaluate and manage risks in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements.

Business Continuity

You are encouraged to implement appropriate business continuity plans for operations supporting Eakin Healthcare's business.

Commitment & Accountability

You shall fulfill the principles set forth in this Supplier Code of Conduct by allocating appropriate resources and incorporating all applicable aspects into policies and procedures.

Communication of Sustainability Criteria in the Supply Chain

You shall replicate the sustainability principles set forth in this Supplier Code of Conduct further down the supply chain.

Continuous Improvement

You shall demonstrate their commitment to continuous improvement by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

Training & Competency

You will develop, implement and maintain appropriate training measures to allow your managers and employees to gain an appropriate level of knowledge and understanding of the applicable principles of this Supplier Code of Conduct, the applicable laws and regulations and generally recognised standards.

Transparency & Disclosure

You are encouraged to report externally about your economic, social and environmental impact in line with the principles set forth in this Supplier Code of Conduct.

Right to Evaluation

You shall grant Eakin Healthcare the right to evaluate your performance upon reasonable prior notice to determine your conformance with principles outlined in the Eakin Healthcare Supplier Code of Conduct and the Eakin Supplier Scorecard. The evaluation shall be executed directly by Eakin Healthcare or by a qualified third party in the form of e.g. an assessment or an audit.