



Supplier Code of Conduct



Edwards

Our Credo

At Edwards Lifesciences, we are dedicated to providing innovative solutions for people fighting cardiovascular disease.

Through our actions, we will become trusted partners with customers, colleagues, and patients — creating a community unified in its mission to improve the quality of life around the world. Our results will benefit customers, patients, employees, and shareholders.

We will celebrate our successes, thrive on discovery, and continually expand our boundaries. We will act boldly, decisively, and with determination on behalf of people fighting cardiovascular disease.

Helping patients is our life's work, and

life is now

Purpose and Scope

Edwards' suppliers are integral to our business and our ability to serve patients around the world. Edwards has a long-standing commitment to conducting business according to the highest standards of integrity and business ethics, as reflected in our Global Business Practices Standards (the "Titanium Book"), [link] embodied in our Credo, and embedded in all of our business relationships. Edwards holds its suppliers to the same high standards, and will only maintain relationships with those suppliers who demonstrate a commitment to:

- Compliance with Laws and Regulations;
- Ethical Business Practices;
- Human Rights/Fair Labor and Employment Standards;
- A Safe and Healthy Workplace;
- Environmental Responsibility and
- Management Systems

This Supplier Code of Conduct outlines our expectations and minimum requirements for all direct materials suppliers and regulated indirect products and services suppliers (Suppliers) engaged by Edwards Lifesciences globally.

Edwards reserves the right to assess Suppliers' adherence to the principles set forth in this Code of Conduct, and may, from time to time, suggest certain remediation measures to be taken. A Supplier's failure to conform to principles of this Code of Conduct may lead to disqualification from consideration or termination of the relationship.

Edwards may amend this Supplier Code of Conduct from time to time. The most up to date version can be found on our [website](#).

Compliance with Laws and Regulations

Suppliers are required to operate in full compliance with all laws, rules and regulations that apply to their operations globally, including but not limited to laws regarding ethical business practices, human rights, labor and employment, environmental protection, and health and safety.

Suppliers are expected to follow generally accepted industry standards and to obtain and maintain in good standing all necessary permits, approvals, licenses and registrations from relevant regulatory bodies.

Ethical Business Practices

Edwards prohibits all forms of corruption, misrepresentation, extortion or bribery. Suppliers are expected to comply with all applicable anti-corruption and anti-bribery laws including, but not limited to, the Foreign Corrupt Practices Act of 1977, as amended. Suppliers must never pay or accept bribes or other improper inducements in any business or government interaction. All financial books and business records maintained by Suppliers must be truthful, accurate and complete.

Suppliers are expected to avoid all conflicts of interest, whether actual or perceived. Suppliers must never provide inducements or favors to Edwards employees or to those working on behalf of Edwards to secure an improper advantage or to obtain or retain business. For more information, please see [Edwards' Global Integrity Program](#).

Human Rights, Fair Labor and Employment

Edwards respects the human rights of all workers and will not tolerate any form of human rights or labor abuses in its supply chain.

Prohibition Against Involuntary Labor, Child Labor, Human Trafficking

Suppliers shall not use, support, or permit slavery, forced labor, child labor or trafficking of any kind within its operations. *

Suppliers must ensure all workers are of legal age for employment in their local country or the country in which work is performed, whichever is the highest. Suppliers must maintain official and verifiable documentation of each employee's date of birth, or lacking this documentation, have a legally recognizable means of confirming each employee's age.

Upon request, Suppliers shall certify that they have implemented reasonable measures to comply with all laws regarding modern slavery and human trafficking.

Non-Discrimination

Edwards values diversity, inclusion and belonging and condemns discrimination of any kind, including but not limited to, discrimination on the basis of age, race, gender, disability or religion.

Suppliers are prohibited from engaging in any form of unlawful workplace discrimination.

Fair Wages and Benefits

Wages paid by Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Working Hours and Overtime

Suppliers shall comply with applicable laws on regular working hours and overtime. Overtime hours should entitle employees to receive overtime pay, at a rate higher than the employee's regular wage.

Conflict Minerals

Conflict Minerals Suppliers shall determine whether the products they sell to Edwards contain any tin, tantalum, tungsten and gold ("3TG"), and if so, whether these minerals directly or indirectly financed or benefited armed groups that are perpetrators of human rights abuses in the Democratic Republic of Congo or any adjoining country.

Suppliers shall undertake reasonable efforts to perform due diligence on the source and chain of custody of these minerals and make their due diligence and findings available to Edwards at Edwards' request.

For more information, please review our [Conflict Minerals Policy](#).

** Edwards uses the ILO definition of [child labor](#), referring to work that is mentally, physically, socially, or morally dangerous and harmful to children and/or interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. As defined by the ILO, [forced labor](#) is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.*

Safe and Healthy Workplace

Suppliers must conform to all applicable health and safety laws and regulations, as well as applicable industry regulations. Suppliers must have a program or other appropriate mechanism to monitor and enforce compliance with health and safety requirements.

Suppliers are responsible for assuring that all of its employees are provided with a safe, clean and healthy place to work. All workers should be qualified to perform their work functions safely.

Environmental Responsibility

Environmental responsibility is integral to delivering world class products that create patient, stakeholder and community value. Edwards expects its suppliers to comply with all applicable environmental laws and regulations, including but not limited to: obtaining and adhering to permitting requirements and approvals; management and disposal of hazardous materials; releases of contaminants to the air, soil and water; protection of natural resources; prohibition or restriction of specific substances; and recycling of materials.

Suppliers should strive to eliminate or reduce waste of all types, including waste of materials, water and energy, by appropriate means (for example, by recycling and conserving material). All hazardous materials and chemicals, including wastewater and solid waste generated from operations, must be disposed of using environmentally responsible practices.

Edwards also expects its Suppliers to demonstrate a commitment to responsible environmental stewardship by implementing environmental management systems and continuously monitoring and improving their environmental performance. Management systems should track “key performance indicators” and establish meaningful short- and long-term improvement targets.

Management Systems

Suppliers shall maintain appropriate and adequate resource management systems to facilitate compliance with the principles set out in this Code. Such systems should include processes, procedures and standards that cover:

- Training and competency programs;
- Risks identification, risk management and internal controls;
- Data integrity;
- Maintenance of documentation and records evidencing compliance with applicable legal, regulatory and contractual requirements;
- Data security and robust protection of intellectual property, confidential information, personal information and other sensitive data; and
- Continuous improvement and business continuity.

Report a Concern

Edwards has established the Edwards Integrity Helpline as a resource for raising ethical questions or concerns. The Helpline is hosted by a third party and is available 24 hours a day, 7 days a week.

Any matter reported through the Helpline is treated confidentially and shared only with those that need to know for purposes of an investigation and, if appropriate, corrective action. Reports can be made to the Edwards Integrity Helpline anonymously, as permitted by local law. In certain countries, anonymous reporting is prohibited, and Edwards may be required to reveal a caller's identity.

Edwards strictly prohibits retaliation against any individual who reports a concern in good faith or participates in the company's investigation of such a concern.

The Edwards Integrity Helpline can be accessed by telephone in the U.S. by dialing 877.219.3178. Telephone numbers and instructions for employees based in other countries are published on the Edwards employee intranet. Reports to the Helpline may also be made via the internet:

[edwards.ethicspoint.com](https://www.edwards.ethicspoint.com).

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