

Responsible Supply Chain

At Edwards, we value our relationships with our suppliers. We seek to conduct business with suppliers who:

- do not engage in human trafficking or modern slavery,
- adhere to ethical business practices,
- act in an environmentally responsible manner,
- encourage workplace health and safety,
- adopt good human resources policies and practices, and
- abide by all applicable laws.

We regularly perform a variety of actions and activities to ensure that suppliers providing materials to Edwards meet these expectations, as discussed below.

SUPPLIER ASSESSMENTS AND QUALIFICATIONS

At Edwards, we periodically assess our supplier base risk profile, which indicates a low risk of modern slavery in our supply chains. Being in the highly regulated medical device industry that impacts the products and components we purchase for our medical devices, we typically aim to avoid adding new medical device suppliers unless necessary and minimize sourcing from less developed regions of the world, which further reduces this risk.

Prior to engaging a new supplier, Edwards typically evaluates the supplier through a risk-based assessment process. We use a third-party monitoring service to perform additional due diligence on select new direct materials suppliers, which includes a supplier questionnaire and an audit of their facilities, quality systems, and business practices, and subsequently may include follow-up visits and reviews. We also perform public database and adverse media monitoring of our suppliers through our third-party monitoring service. In addition, we specifically ask our new suppliers to respond to a questionnaire regarding their sustainability practices and, if applicable, their healthcare compliance.

SUPPLIER PERFORMANCE REVIEW

Edwards is committed to continuous improvement in our supply chain. To that end, we periodically monitor the business performance of our strategic and key suppliers through performance and objectives discussions and business reviews. If we discover that a supplier has breached or potentially breached our standards, we take appropriate remedial action (which could include terminating our relationship with that supplier depending on the severity level). No specific risks or incidents of human trafficking or modern slavery were identified for any supplier during 2022.

SUPPLIER AUDITS

Edwards periodically audits suppliers to confirm compliance with performance and quality standards. Verifications and factory audits may be performed directly by Edwards or by third parties. Audits are typically pre-planned events with the supplier. Our audits verify suppliers' compliance with our written agreements and quality systems requirements. Audit findings and recommendations are discussed with each supplier's facility management. The supplier is expected to address all issues arising from the audit and Edwards validates the supplier's corrective actions during follow-up audits or reviews.

SUPPLIER AGREEMENTS

Edwards generally has supply contracts, quality agreements, and/or purchase order terms and conditions with its strategic and key suppliers. These documents include the supplier's agreement to comply with all laws applicable to the supply of services or materials to Edwards.

EMPLOYEE TRAINING AND COMPLIANCE

All Edwards employees are required to comply with Edwards' written Global Business Practice Standards, which is our code of conduct. These Standards include Edwards' commitment not to produce or manufacture goods using forced or sweatshop labor, or indentured child labor. Our employees participate in periodic training to enhance understanding and compliance with the Global Business Practice Standards. In addition, we audit employee compliance with the Global Business Practice Standards, investigate potential violations and, when appropriate, take remedial and/or disciplinary action.

In addition, we make available on our external website and corporate intranet our Responsible Supply Chain statement and Supplier Code of Conduct to enhance easy access to, and awareness of, these documents. We also inform our supply chain managers how they can further promote the objectives of modern slavery laws with our suppliers and be more conscious of working conditions at suppliers' facilities.

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

The California Transparency in Supply Chains Act requires many manufacturers, including Edwards, to disclose their efforts to eradicate modern slavery in their direct supply chains of tangible goods offered for sale. These disclosures are intended to allow businesses and consumers to make more informed decisions about the products they choose to purchase and the companies they choose to support. We have published this Statement in furtherance of the California Transparency in Supply Chains Act.

U.K. MODERN SLAVERY ACT

The United Kingdom's Modern Slavery Act requires certain organizations to disclose the steps they have taken to address modern slavery in their own business and supply chains. This Statement serves as the U.K. Modern Slavery disclosure for our subsidiary, Edwards Lifesciences Limited, for the fiscal year ended December 31, 2022. This Statement was approved by the board of directors of Edwards Lifesciences Limited on February 27, 2024 and signed by a director of that entity.

Solely for purposes of the U.K. Modern Slavery Act, this Statement was signed by Linda J. Park, a director of Edwards Lifesciences Limited, on March 6, 2024.



ADDITIONAL INFORMATION

For additional information on the topics addressed in this Statement, also see our website, in particular our current [Sustainability Report](#) and our [Conflict Minerals Report](#), and more generally the [Corporate Responsibility](#) pages of our website.