

Code of Conduct





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Boston Scientific Mission

Boston Scientific is dedicated to transforming lives through innovative medical solutions that improve the health of patients around the world.





Boston Scientific Culture, Values and Behaviors

Our culture is based on a strong foundation of clear and simple values and behaviors which are the core of everything we do – externally and internally.

Caring

We act with integrity and compassion to support patients, customers, communities, the planet and each other.
I do the right thing.
I listen with empathy.

Diversity

We embrace diversity, equity and inclusion, valuing unique ideas and experiences.
I respect different perspectives.
I include others.

Global Collaboration

We work collaboratively to pursue global opportunities that extend the reach of our medical solutions.
I create common purpose.
I assume positive intent.

Winning Spirit

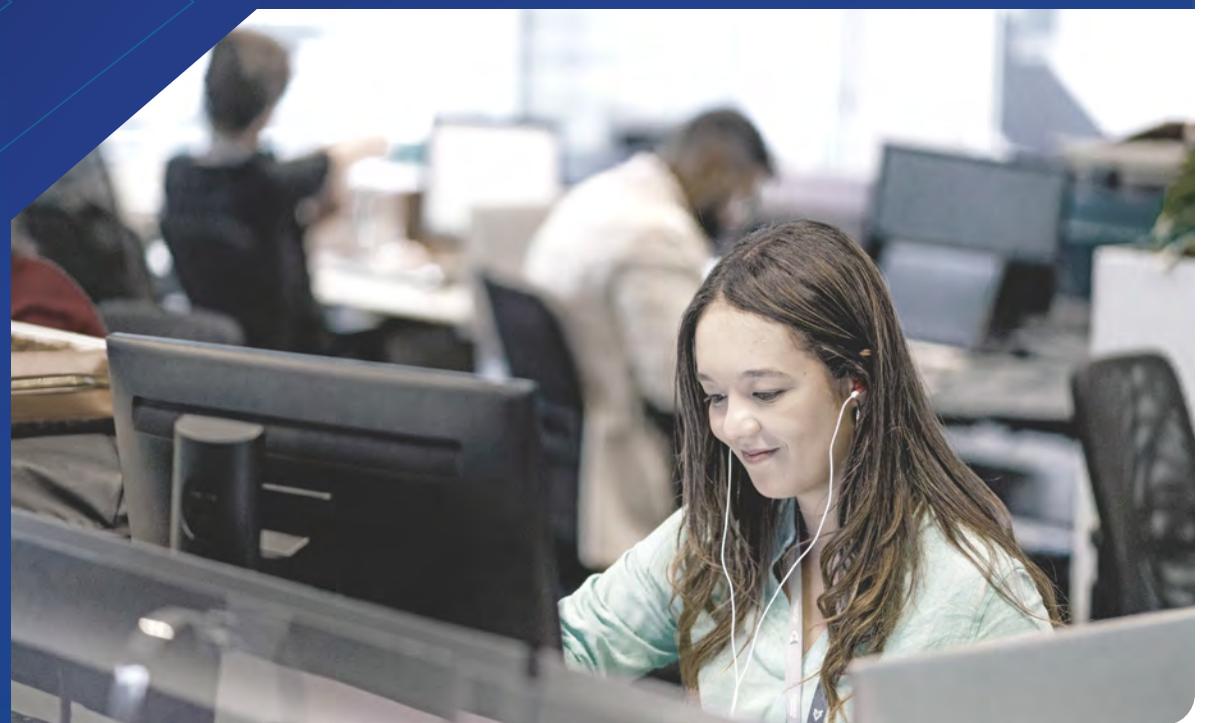
We adapt to change and act with speed, agility and accountability to further improve patient care.
I dare to try.
I play to win.

Meaningful Innovation

We transform new ideas into breakthrough services and sustainable solutions that create value.
I lean into change.
I solve unmet needs.

High Performance

We strive for high performance to benefit patients, customers, shareholders and employees.
I deliver what matters.
I learn, I coach.





Boston Scientific's Code of Conduct

At Boston Scientific, we are part of a community dedicated to groundbreaking technology that transforms lives. Together with our customers, we service patients, communities, the planet and each other.

Integrity is fundamental to Boston Scientific. How we act and speak on behalf of Boston Scientific influences how customers feel about our products and how shareholders perceive us as an investment. It's up to all of us to protect our reputation.

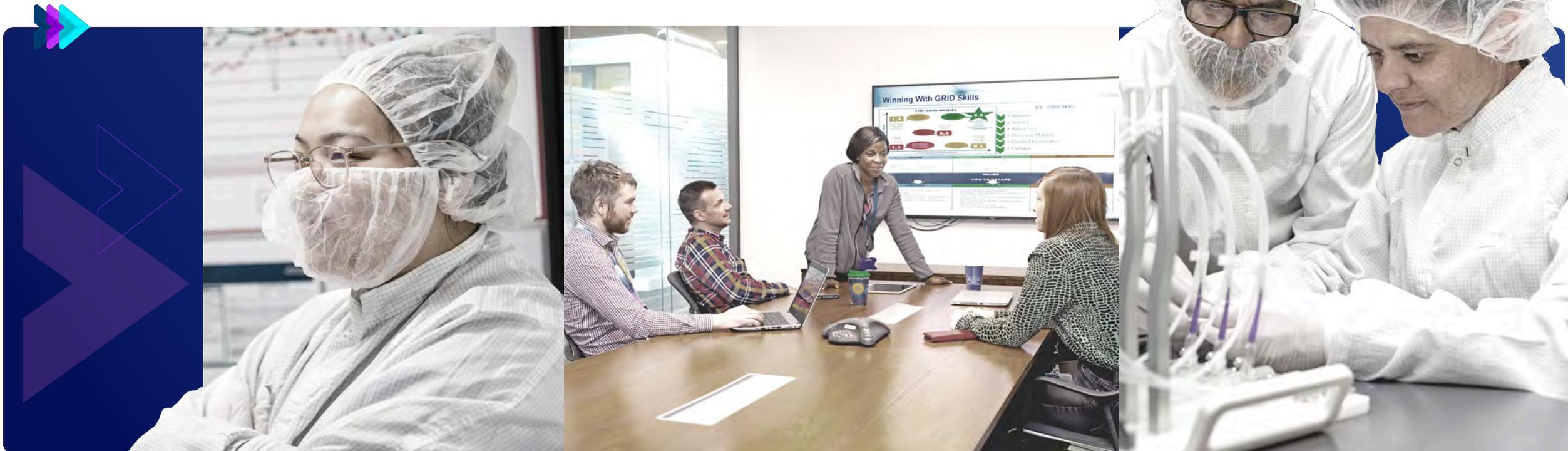
Integrity is a promise to do what is right. This means acting honestly and treating each other and our customers, patients, and suppliers fairly and with dignity. By acting with integrity, we reflect positively the values and reputation of the Company.

The Code of Conduct (the "Code") is meant to serve as a foundation for our other policies. Use the Code to:

- Maintain integrity, ethics and trust in all business relationships while simultaneously striving for high customer satisfaction, and

- Encourage ethical discussions and improve how we deal with the ethical dilemmas and gray areas that are encountered in everyday work.

We all want to do what is right, for ourselves and for Boston Scientific. Acting with integrity is about more than our Company's image and reputation or avoiding legal issues. It's about sustaining a place where we are all proud to work.





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What Does It Mean to **Act** **with Integrity?**

Acting with integrity means living the Code, not just reading it. Following it is a mandatory part of your responsibilities on behalf of Boston Scientific. So, if you observe or experience something that concerns you, raise questions until you get answers otherwise report your concerns. Review the Code regularly so it's always fresh in your mind.





Live the Spirit of the Code

The Code expresses Boston Scientific’s commitment to conducting business ethically. It explains what it means to act with integrity in everything we do and in accordance with our core values. Boston Scientific expects you to follow both the spirit and the letter of the Code in all Company matters; it is a mandatory part of your job. This means you are expected to:

- 1 Conduct yourself in ways that show you understand our Code, policies and procedures, and applicable laws that apply to your job.
- 2 Follow the applicable legal requirements of all locations where we do business.
- 3 Speak up if you have concerns or suspect violations of our Code, policies and procedures, or applicable laws.
- 4 When requested, certify that you have reviewed, understand and agree to follow the Code.



The Code cannot address every situation that may occur. You are expected to exercise good judgment and ask questions when you need guidance or clarification. [Resources](#) available to assist you are listed at the end of the Code.

The Code applies to all employees, third parties, officers, and directors of Boston Scientific worldwide. We also expect our distributors, agents, contractors, temporary employees, interns, vendors and suppliers to maintain the standards in our Code when acting on our behalf. Requiring adherence to the Code is not intended to imply that any individual, other than our own employees, are employees of Boston Scientific.

The following pertains only to Company executive officers and directors: Any waiver of the Code involving executive officers and directors may be made only by the Board of Directors or a Board committee comprised of independent directors and such waivers may be disclosed as required by law.

The Code applies to all employees, third parties, officers, and directors of Boston Scientific worldwide.



Questions & Answers

Q What should I do if I am not sure which Company policies and procedures apply to my job?

A The Code is a key resource for everyone who works at Boston Scientific. If you have a question about more specific Company policies and procedures, check with your manager or contact any of the [resources](#) listed at the end of the Code.

Q I perform work in a country where the laws are different from those in the country where I am based. Does the Code cover both locations?

A Boston Scientific respects the letter and the spirit of the laws and customs of every place where we do business. The Code is intended to be broad enough to cover everyone worldwide, but laws vary from place to place. What may be lawful in one place may be unlawful in another. Employees must always perform their jobs in compliance with applicable laws, policies and procedures. If you are concerned about a possible conflict involving our Code, Company policies and procedures, and any local laws or customs, contact any of the [resources](#) listed at the end of the Code.



Ask Questions and Raise Concerns

We all have a responsibility to immediately raise concerns of known or suspected violations of the Code, policies and procedures, or applicable laws. If you are not sure what to do, ask questions and seek advice. When faced with new, unclear, or important situations, ask yourself these questions:

- Is this consistent with Boston Scientific’s core values and behaviors, Code, policies and procedures, and applicable laws?
- What do I think is fair and ethical in this situation?
- What is in the best interest of patient care?
- How would I feel if this appeared on the front page of a newspaper? How would Boston Scientific employees, customers, patients, or shareholders feel?
- What is the right thing to do?



Non-retaliation Policy

Boston Scientific’s non-retaliation policy—a cornerstone of the Code—is strictly enforced. We do not tolerate any form of retaliation (whether by a manager, co-worker, or otherwise) against an individual because they made a good faith report of an integrity concern. The Company’s non-retaliation policy also extends to anyone who assists with or cooperates in an investigation or report of an integrity concern or question.

Questions & Answers

Q Last year, I managed a project in a way that I thought was appropriate at the time. After attending a training session on a relevant topic, I now have some concerns about it. What should I do?

A You should raise the issue. Talk to your manager or contact any of the [resources](#) listed at the end of the Code. It is in everyone’s best interest to resolve integrity concerns, even if they happened in the past. It may be possible to correct the issue moving forward, or, if a similar situation arises in the future, you will have a better idea of how to handle it.

Q I discussed an integrity concern with my manager, and she said she would look into it. Nothing happened. Several months have passed, and the situation that caused my integrity concern is still occurring. I am afraid to ask my manager again. What should I do?

A You should continue to raise your concern until it has been addressed. First, reach out to your manager again. It is possible that your manager looked into the situation and determined that it was not a problem, or took action to correct it, and it would be helpful for you to know, one way or the other. If your manager is not responsive, you should consider contacting your manager’s manager or one of the other [resources](#) listed at the end of the Code. Contacting a different resource may help clarify the situation.



If you are not sure what to do, ask questions and seek advice.



Lead by Example

We are all role models. Each one of us can lead by example when it comes to acting with integrity. By working together, we can maintain our culture of integrity and accountability. This means you are expected to:



Act with fairness and honesty in all your dealings.



Make sure your direct reports understand and follow our Code, policies and procedures, applicable laws, and our commitment to integrity.



Maintain an environment in your work group that fosters integrity and inclusion.



Know what resources are available to help.



Support employees who, in good faith, ask questions, raise concerns, or cooperate with investigations.



Raise any integrity concerns or known or suspected violations of the Code, Company policies and procedures, or applicable laws immediately.

Boston Scientific managers have a duty to foster a culture of integrity and compliance. This means that:

- **Managers should serve as role models and ensure that colleagues who report to them feel comfortable raising questions and concerns without fear of retaliation.**
- **Any concerns or questions are addressed in a professional and timely manner.**
- **Standards of integrity compliance are not compromised in obtaining business results.**

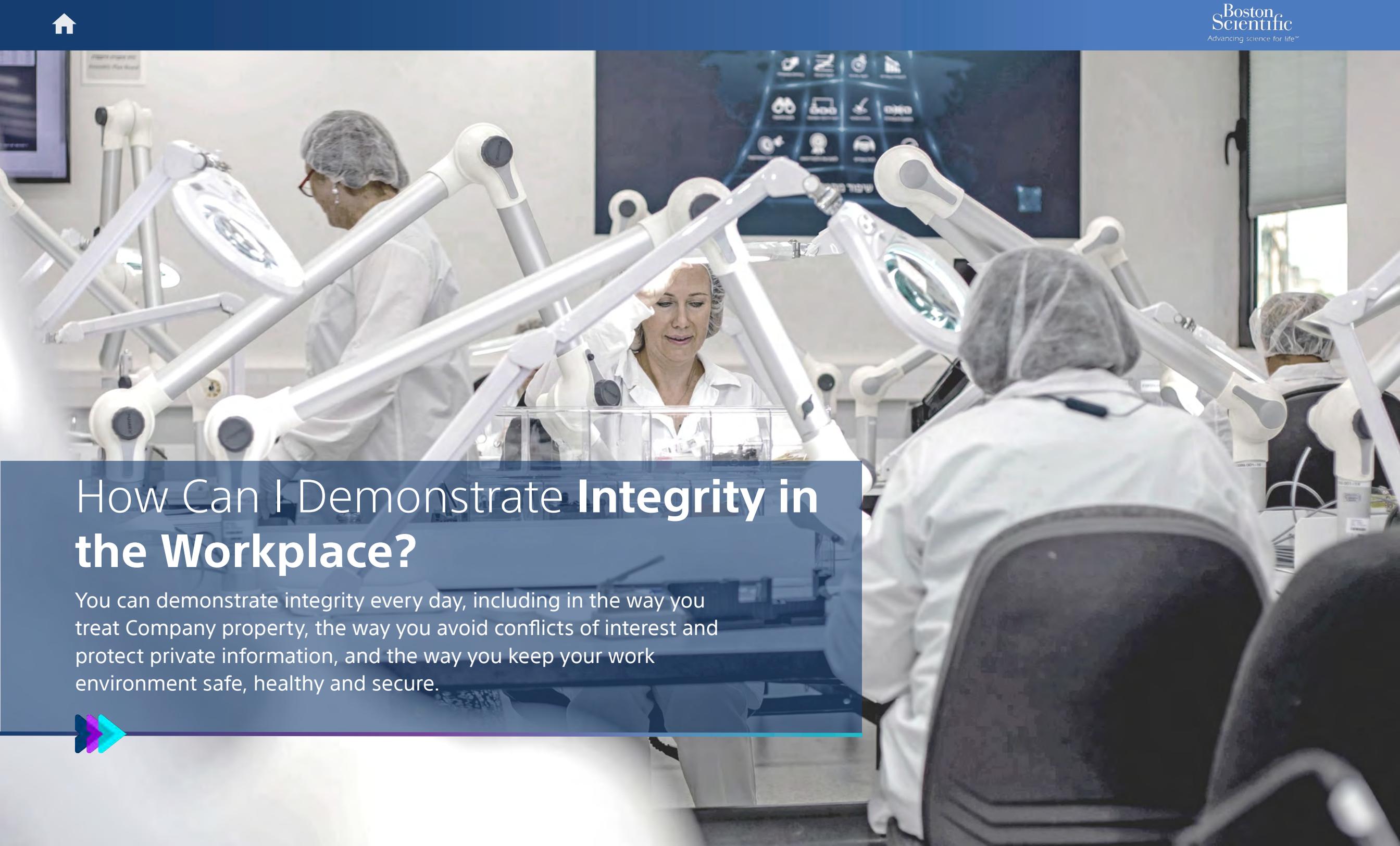
While working on behalf of Boston Scientific, you may face difficult situations. Many times your common sense, good judgment, our Code, and Company policies and procedures will be enough to guide you. However, there may be times when you need additional help to make the right choice. In these cases, contact any of the [resources](#) listed at the end of the Code for additional guidance.



Questions & Answers

Q I think one of my co-workers is violating the Code. Do I need to do anything?

A Yes. When in doubt as to whether an activity is proper, you should voice your concerns to one of the [resources](#) listed at the end of the Code. We are all responsible for upholding the Code, and it is best for everyone to resolve potential integrity concerns right away.

A photograph of a laboratory or cleanroom environment. Several people wearing white lab coats and hairnets are working at stations equipped with large, adjustable white overhead lamps. In the background, a large screen displays various scientific icons and data. The scene is brightly lit and professional.

How Can I Demonstrate **Integrity** in **the Workplace?**

You can demonstrate integrity every day, including in the way you treat Company property, the way you avoid conflicts of interest and protect private information, and the way you keep your work environment safe, healthy and secure.





Be Dedicated to Quality

Our commitment to quality is embodied in our quality policy: **I improve the quality of patient care and all things Boston Scientific.** This statement empowers everyone, in every position, to participate in decisions and actions that could affect quality or compliance with applicable laws and regulations. Boston Scientific expects you to take responsibility for quality. This means you are expected to:

- Take pride in your work and pay careful attention to detail, regardless of the task.
- Follow Company policies, procedures, and work instructions every single time.
- Complete all required training in a timely manner.

- Take appropriate action whenever you are concerned about quality.
- Immediately report all potential product complaints.
- Immediately report any situation that could result in a quality or regulatory issue.
- Look for ways to improve quality within your job and the Company.
- Above all, keep quality as your #1 priority.

Performing your job with integrity helps Boston Scientific ensure that it satisfies laws, regulations, customer requirements, and patient needs.



**I improve
the Quality of
Patient Care and
all things Boston Scientific.**



Questions & Answers

Q The product builders in my area do not always follow the manufacturing instructions as written. One employee has even developed a shortcut and encourages others to use it. I do not want my co-workers to know that I raised this issue, but I am concerned about the impact on product quality. What should I do?

A Raise the issue right away with one of the [resources](#) listed at the end of the Code. It is extremely important to follow manufacturing instructions as written. Failure to do so could result in non-conforming products, regulatory problems, or other serious issues. Your report or inquiry will be kept as confidential as possible under the circumstances. Remember that the Advice Line allows anonymous reporting, unless local law restricts it. In those situations, callers are referred to an alternative resource.

Q I have a suggestion on how to reduce product defects on my production line. I believe the solution may increase the time needed to produce the product, and I have a concern about raising it. What should I do?

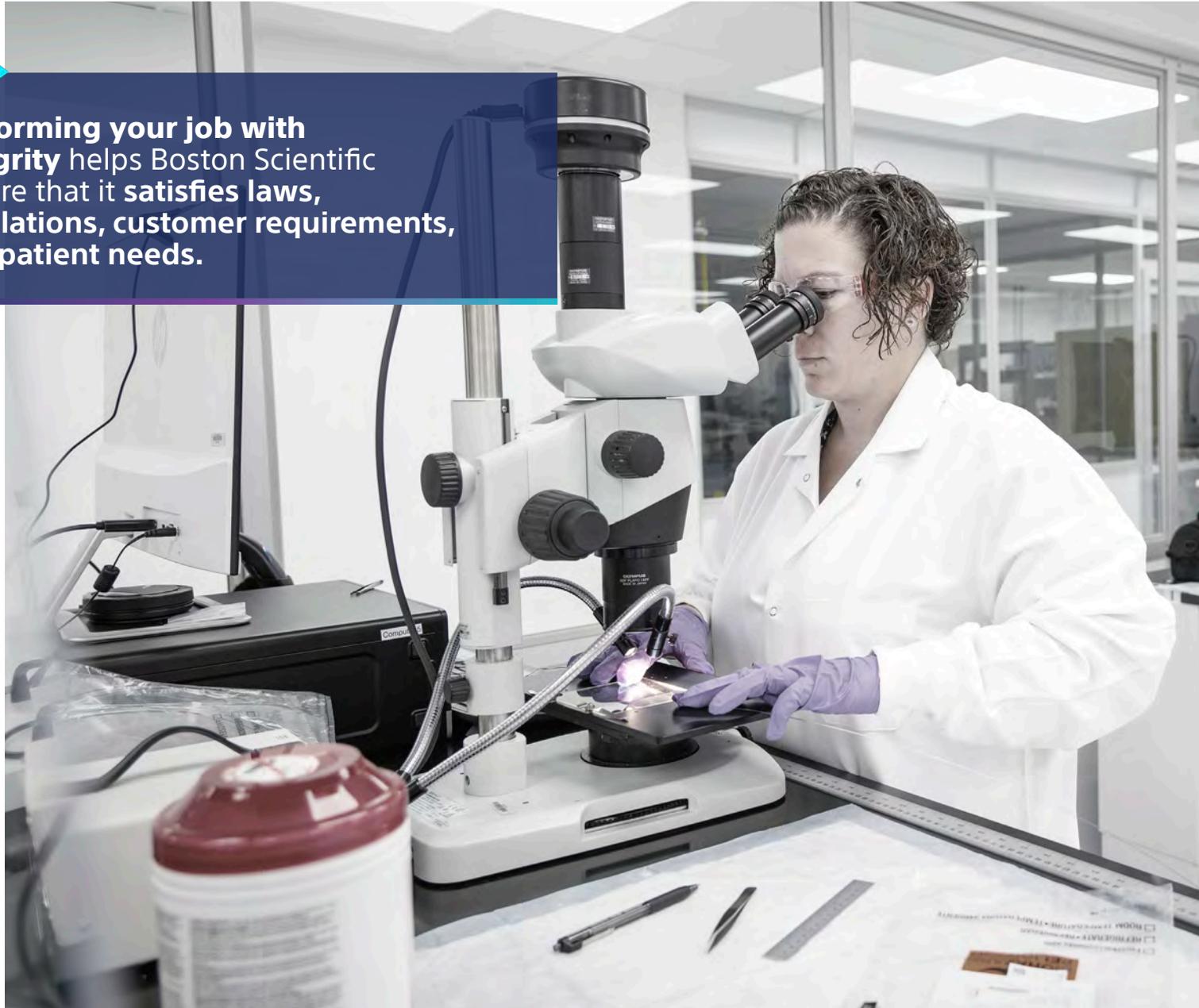
A Bring the suggestion forward. Boston Scientific values all employees' suggestions to improve how we operate and do business. If your idea works, the extra time we spend preventing the product defect could mean that fewer products will be scrapped. This will save us time in the end, and more importantly, may improve the quality of our products and patient care. Usually, it is best to discuss a suggestion like this with your manager, but if you feel you cannot, you should contact one of the [resources](#) listed at the end of the Code.



Be Dedicated to Quality *(continued)*



Performing your job with integrity helps Boston Scientific ensure that it **satisfies laws, regulations, customer requirements, and patient needs.**



Questions & Answers

Q I was on an airplane next to a woman whose doctor had used a Boston Scientific device for her treatment. She told me that her device had recently malfunctioned, but I did not understand what had happened from her explanation. However, I did write down her name and phone number. Do I need to do anything else?

A Yes. First, you should follow the complaint reporting procedure. If you are unsure about it, call the Customer Complaint Call Center immediately and give them all of the information you have. Boston Scientific is required to gather information about experiences like these and determine whether there may be a problem with the product. In some circumstances, Boston Scientific must report product experience information to government agencies. Also, in the future, if someone reports a concern to you, you should try to gather some additional information that could assist in understanding the potential concern. In the example above, you could have asked the type and/or name of the device. You could also have asked if either she, or her doctor, had already called the Boston Scientific Complaint Call Center to report the information. Finally, you could have requested the name of her doctor and the hospital where she received the device, ensuring that the privacy of all collected patient information is protected.



Be Respectful of Others

Our commitment to integrity includes treating others with respect and fairness. This means you are expected to:

- Act professionally in all job-related activities, including Company-sponsored off-site events and social gatherings.
- Make sure that decisions affecting employees are based on business factors only. For instance, decisions regarding hiring, promotions, terminations, transfers, leaves of absence or compensation should only be based on relevant business factors.
- Respect Company property and the property of customers and co-workers.

- Never verbally or physically mistreat others or engage in offensive behavior. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence, and any other conduct that interferes with a co-worker's ability to do their job.
- Follow all applicable policies regarding employee conduct.
- Never record or download in any manner (audio or visual, including generative artificial intelligence tools) ideas, data, processes, products, research and development, or any work-related activities or conversations that are not for authorized use by the Company.



Questions & Answers

Q I recently participated in a meeting about an important decision where a colleague of mine openly disagreed with me in front of everyone else in the room. They were verbally abusive and yelled at me during the meeting. Should I report their behavior?

A Yes. Boston Scientific does not tolerate threatening or abusive behavior of any kind. You should report the incident to any of the [resources](#) listed at the end of the Code. While Boston Scientific encourages open dialogue, we should always treat one another respectfully and maintain a constructive work environment.

Q I was at a recent off-site Boston Scientific event where one of my colleagues made me feel uncomfortable because they were making sexual comments about the way I looked. Who can I speak to about these concerns?

A Boston Scientific does not tolerate any form of harassment or bullying, including sexual harassment. You should report your concerns to any of the [resources](#) listed at the end of the Code. It's important that employees are treated respectfully and act professionally in all job-related activities, including off-site Company sponsored events.

Our commitment to integrity includes treating others with **respect and fairness.**



Respect Human Rights and Follow Fair Labor Practices

Boston Scientific is committed to acting ethically and with integrity in all of our working relationships. We work to advance principles of human rights as recognized and understood by the international community, which include freely chosen employment, avoidance of child labor, reasonable working hours, fair wages and benefits, humane treatment and responsible sourcing. Our suppliers and direct contractors also must demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

Boston Scientific is dedicated to following fair employment practices that provide equal opportunities to all employees. We do not discriminate or tolerate harassment on the basis of race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status. Boston Scientific values diversity and inclusion, and we believe that a diverse and inclusive workplace fosters innovation and supports our business goals.





Respect Company Property

Company property includes far more than many of us may realize. It includes equipment, data, technological concepts, business strategies, customer lists, and materials that contain Company information, to name just a few. When using or accessing Company property, you are expected to:

- Use Company property appropriately and efficiently and return it upon termination of employment at Boston Scientific.
- Spend Company money wisely.
- Protect Company property from theft, loss, unauthorized access or use, destruction, or waste.
- Refrain from connecting personal laptops and personal computers to internal Boston Scientific computing systems, without the use of an approved Virtual Private Network (VPN) to prevent unwanted access or loss of Boston Scientific assets, including personal data.
- Only use approved cloud storage systems and/or file sharing services for the storage of Company property, including personal data, to prevent unwanted access or loss of Boston Scientific property.
- Refrain from using Company property for personal gain. This means, among other things, that you cannot use Boston Scientific proprietary information, even if you developed or helped develop the information, to create a commercial interest outside of your work at Boston Scientific. Also, you may not use administrative privileges or elevated user rights outside the scope for which they have been granted to you.
- Use Company property in ways consistent with applicable policies and laws.



You may use the Company's information systems for occasional and reasonable personal use. This must never compromise the security of Company information. Also, remember that Boston Scientific may monitor, access, review, copy and disclose any information contained on Company property (including personal information on a Company issued phone or information and computer systems), unless restricted by local law. The Company may require that its property be returned at any time. You should also be aware that unauthorized use of Boston Scientific property or proprietary information could violate the law.



Respect Company Property *(continued)*



Questions & Answers

Q I use my work email and Boston Scientific issued phone to sometimes communicate with family members. Is it okay to do so?

A Boston Scientific's information systems are Company property and generally should be used only for business activities. Though occasional and reasonable personal use is permitted, you must exercise good judgment. Your personal use should be consistent with our Code and Company policies and procedures, and not interfere with your work. Remember that whenever you send a message from your company e-mail account, recipients may assume that you are speaking for the Company. Do not send messages with a defamatory or inappropriate tone, or content that would not reflect well on the Company if made public. Think carefully about how your messages may be interpreted by others.

Q I noticed that my co-worker who sits at the desk next to me is visiting inappropriate websites that make me uncomfortable. What should I do?

A Unless prohibited by local laws, Boston Scientific monitors internet and email usage. As a result, the Company blocks many unsafe and inappropriate websites. However, if your co-worker is able to access a website that makes you uncomfortable, talk to your manager or your manager's manager, Human Resources or any of the [resources](#) listed at the end of this Code.

Q I am starting a small business with some colleagues after work hours. My management is aware of it. The business will not compete with Boston Scientific and has received the necessary approval that it is not a conflict of interest. Can I use my Company cell phone number as the main telephone number for the business?

A No. While you may engage in a side business that has been disclosed and approved, does not conflict with your work for Boston Scientific and is not otherwise restricted, you may not use Company time, property, or other resources to do so.

Q My manager has tasked me with an immediate deadline that will require me to work from home. Can I send work-related materials to and from my personal email account in order to access this information outside of work?

A No. Company information should not be sent or uploaded to non- Boston Scientific information systems, such as personal email services or file sharing locations. If you need to access Boston Scientific files while working remotely (and cannot do so from your BSC-issued laptop), contact the IT Help Desk to set up your personal device to securely access the Company network and your business files. For additional support, please contact the eSolution Center.





Avoid Conflicts of Interest

You may encounter a conflict of interest when your personal interests conflict with Boston Scientific's interests. Boston Scientific expects you to use your best efforts for the Company's success and, in some cases, your personal interests may impact your ability to make sound and objective decisions. You should avoid engaging in any activity that is, or could appear to be, a conflict between your interests and those of Boston Scientific. You are responsible for understanding the Company's policies on conflicts of interest and being open and forthcoming about actual or perceived conflicts should they arise so that situations can be addressed appropriately. Examples of potential conflicts that you must disclose to Human Resources, Legal or Global Compliance include:



Consulting or holding a second job with a competitor, supplier, or customer.



Holding a substantial financial interest in any competitor, supplier, or customer.



Being involved in selection decisions or supervising a contractor in which you have a financial interest, or for which a spouse, significant other or other family member works.



Receiving a personal benefit or gain from any commercial opportunities discovered in the course of your job with Boston Scientific.



Starting a competing business or pursuing any commercial opportunity that would appear to interfere with the best interests of Boston Scientific.



Hiring an individual referred to Boston Scientific by a vendor or customer.



Having a close personal or romantic relationship with a supplier or customer.



Having a close personal or romantic relationship with someone you supervise.



Hiring or having a reporting relationship with a spouse, significant other or other family member.



Attending social, recreational or other leisure events with suppliers during the process of selecting a supplier or negotiating an agreement with a supplier.



Avoid Conflicts of Interest *(continued)*

Gifts and entertainment offered by suppliers, vendors, contractors, customers, and competitors may make it difficult for you to be objective in your business relationships and your decision-making on behalf of Boston Scientific. You should not accept gifts, entertainment, or personal benefits from a supplier, vendor, contractor, customer, or competitor if this would affect or create the appearance of affecting your business decisions. Also, you may never accept gifts that:

- Are cash or cash equivalents (for example, lottery tickets, gift cards, or travel vouchers).
- Are free services, products or equipment for business, personal or family use.
- Cause you to feel obliged to act a certain way with respect to the giver or which influence or appear to influence your business judgment (for example, expensive or luxury tickets to a sporting event or an expensive gift around the time you could influence current or future business with the giver).
- Are extravagant or frequent (for example, luxury items, meals at high-end restaurants, or several gifts or benefits within a year).
- Otherwise violate any Company policy or a policy of the giver's employer.

If you are unsure whether you should accept a business gift or entertainment, you should seek guidance. You must disclose all potential conflicts of interest as soon as they arise. Employees are encouraged to raise any questionable situations with their managers or Human Resources first unless, under the circumstances, you feel the sensitivities or seriousness of the situation warrants going directly to Legal or Global Compliance. Managers who are an employee's initial point of contact for a conflict of interest question or report are responsible for notifying Human Resources, Legal, or Global Compliance who will ensure that the situation is assessed and documented appropriately.

Questions & Answers

Q I am a sales representative and I have become very close friends over the years with a doctor who is one of my largest customers. We frequently socialize outside of work. Can I continue to cover this doctor's account?

A The Company recognizes that, based on the nature of our business, our employees and our customers may become good friends. In most circumstances, employees can cover accounts of customers they consider friends. But, employees are required to disclose such relationships so that their managers and Human Resources are aware of the personal relationship and can make a final determination if there are any potential conflict of interest concerns. Also, employees need to ensure that doctors pay for themselves during all non-business interactions.

Q One of the Company's vendors always sends me a large gift basket of fruit and chocolate during the holiday season. Can I accept this?

A Because the gift baskets tend to be of limited value, and you receive them infrequently, it is unlikely that they cause you to feel an obligation or influence your judgment. If that is the case, you can continue to accept them. However, you are encouraged to share the gift baskets with the other employees in your department.

Q I am a Boston Scientific employee, and I manage our relationship with a vendor who does work for the Company. The vendor recently offered tickets for my family and me to attend a World Cup game. May I accept them?

A Accepting tickets to sporting events or other gifts from customers, vendors or suppliers that have more than a modest value may create an actual or perceived conflict of interest that impacts your independent judgment. Each of these cases is different, however, and you should contact your manager, Legal, Global Compliance or one of the other [resources](#) listed at the end of the Code to determine whether you can accept the tickets.



Avoid Conflicts of Interest *(continued)*



You must disclose **all possible conflicts of interest** in advance to your **manager**.

Questions & Answers

Q I am a Boston Scientific employee, and I am trying to raise funds to support the Company's participation in an upcoming charitable heart walk. Can I approach local businesses to solicit donations?

A Yes, provided that you are not requesting donations from Boston Scientific suppliers, vendors, or customers. Please contact Community Relations prior to reaching out to specific businesses.

Q I recently married, and my spouse already owned a substantial amount of a competitor's stock. Is this a conflict of interest?

A It is probably not a problem, as long as certain safeguards are in place. You should discuss this with Global Compliance or Legal. In general, investment in a company that is one of Boston Scientific's competitors, vendors, or customers requires prior approval unless the investment is in a publicly traded company and makes up less than one percent of the company's total outstanding stock. You should be careful not to discuss Boston Scientific proprietary information with anyone, regardless of whether your spouse owns stock in a competitor.

Q I have been offered a part-time job on the weekends consulting for a friend's business. This company is not in the medical device field. Is this a problem?

A Even though your friend's business is not in the medical device field, you should talk to your manager about it beforehand to ensure there is no conflict of interest. It is important to know whether your friend's business provides any products or services to Boston Scientific or any of its competitors, customers, suppliers, or vendors. It is also important that the part-time job not interfere with your responsibilities for Boston

Scientific. Managers who are an initial point of contact for a conflict of interest issue or question are responsible for notifying Human Resources.

Q My husband owns a business that sells a non-competitive product to the same customer base with whom I interact for Boston Scientific. May I discuss his product and leave samples while I am calling on customers of Boston Scientific? Can I introduce him to my customers?

A No. You cannot transact business for another person or entity while calling on customers of the Company, even if the product is not competitive with any Boston Scientific products. Leveraging Boston Scientific's relationships with customers to sell even non-competitive products could create an actual or perceived conflict of interest for you or for the customer.

Q My department is in the process of choosing a vendor. One of my employees recommended a company owned by their sister. I have heard good things about this company from other sources. Can I consider this company even though one of my employees is related to the owner?

A This company can compete for the work, but the employee who is related to the owner cannot be involved in decisions about choosing the vendor, nor can the employee be involved in managing the vendor, if chosen. Your employee should also understand that they cannot provide any confidential Boston Scientific information or other advantage that would help their sister's company to be selected. Also, you should consult with Legal or Global Compliance about how this business relationship could result in a conflict of interest, or the appearance of a conflict, and seek guidance to determine the best course of action should the vendor win the work.



Protect Confidential Company Information

Boston Scientific's Company information is valuable, and you must be aware of the types of Company information that should be kept confidential. All Boston Scientific information that is not generally available to the public is considered confidential. It includes information in any format: written, electronic, visual, or verbal. It also includes non-public information that we develop, purchase, or license, and information we receive from others, including suppliers and customers. While you may use Company information as needed to perform your job, you are responsible for protecting that information from theft, improper disclosure, or misuse. This means you are required to:

- Transmit confidential Company information in a secure manner, which includes never using personal email accounts to conduct any Company business or sending confidential Company information to your personal email address.
- Use Company information only for its intended purpose(s) and only in Company approved systems.
- Only access Company information that is related to your individual responsibilities.
- Share Company information only with others who have a legitimate business need to know it and where such disclosure is not prohibited.
- Contact Legal with any questions about confidentiality agreements and only provide confidential Company information to third parties who have a legitimate business need to know the information and have entered into a proper written agreement to protect the information.
- Copy documents containing Company information, or remove such documents from your work area, only when your job requires it. In all such cases, you should take measures to ensure the security and confidentiality of that information while it is outside of the routine protections provided by Boston Scientific.
- Transmit all confidential Company information in a secure manner and take additional security safeguards as appropriate (i.e., removal of names, etc.) when sharing information identifying employees, patients or customers to recipients who have a legitimate business need to know that information.
- Dispose of Company information properly.
- Return to the Company all Company information when you no longer need it to perform your job or if you leave employment at the Company.

Questions & Answers

Q I am leaving Boston Scientific for another company. Do my confidentiality obligations to Boston Scientific continue after I leave?

A Yes. When your Boston Scientific employment ends, you must not use, retain, or disclose Boston Scientific confidential information. You may not copy Boston Scientific sensitive, proprietary or trade secret-related documents when you are leaving the Company, even if you created the documents. Such activity could be considered a violation of law.

Q I am attending a National Sales Meeting and need to send a key customer an important e-mail, but I am having issues sending the e-mail. Should I give my user logon and password to my manager who offered to help? We both want to meet our customer's critical deadline.

A No. You must never share your user logon and password with anyone, even your manager. User logons and passwords help keep Boston Scientific's information systems secure.





Protect Confidential Company Information *(continued)*

We have an obligation to properly manage and keep confidential personal data provided to us by our colleagues, customers, patients, suppliers, and others. We should only collect, access, use or disclose personal data for appropriate business purposes and in accordance with regulations that apply to that data. In addition, we should use the minimum amount of personal data needed to accomplish a task. We must not share this information with anyone, either inside or outside our Company, who does not have a business need to know it. Further, we must take steps to properly secure personal data at all times.

Questions & Answers

Q Standing in line at the cafeteria, I overheard two employees talking loudly about the sales figures that would be released to the public tomorrow. Is this appropriate?

A No. Employees must use caution when discussing Boston Scientific business in public places. Confidential information should not be discussed in public places, including open areas at Boston Scientific, such as Company cafeterias and hallways, where it might be overheard by others. If you were in this situation, you may consider letting the employees know you can hear what they are saying. Also, there are potential securities law implications to discussing certain nonpublic information, like sales figures, with others. For more information, refer to the Code section on Stock Trading Rules.

Q I am traveling to a country that is designated as being “high risk” by Boston Scientific. What should I do to safeguard the security of any confidential Company information?

A In preparing to travel to a “high risk” country, you should contact the eSolution Center and Global Security in advance of your trip. They will provide you with the tools necessary to safeguard your devices while traveling (for example, a loaner laptop may be provided).

Q What should I do if my laptop, cell phone, tablet or other device owned by Boston Scientific or containing Boston Scientific-related information is stolen or I suspect a security breach?

A You must report the missing device or data breach immediately to Global Security and Global Privacy. Make sure that you disclose all information that was on the device including any customer or patient information, so that the Company can take appropriate action, as needed, and comply with all laws on potential data breaches. Also, always make sure that your laptop and other mobile devices are stored securely (for example, in a hotel safe if leaving these items in your unattended hotel room or in a locked trunk if leaving these items in your vehicle).

Q A former colleague of mine called me and asked for the names of the Company Vice Presidents and a chart showing their reporting relationships. They had worked for the Company previously, wanted to return, and were trying to learn the current management structure. Can I give this to them?

A No. Information about our employees and organization structure is confidential. Confidential information should be given only to those who are authorized to have it, both internally and externally. You should not give out any information unless you know it is appropriate to do so. This is true of all Company information and work product. In this situation, you should tell the caller the information is confidential and you cannot provide it.

Q I recently overheard co-workers talking about a new device being developed. Can I post this information on my social networking site?

A No. You are not permitted to share confidential or proprietary information about Boston Scientific on social networking sites or any other public forums (such as Facebook, LinkedIn, WeChat, blogs or chat rooms). In addition, when posting any comments on these sites, you must clearly state that you do not speak on the Company’s behalf, unless it is your job to do so and you are acting in your official capacity. Refer to Boston Scientific’s policies for more information on the proper use of social media.



Boston Scientific’s Company information is valuable and should be kept confidential.



Respect Patient, Customer and Employee Privacy

In the course of its business, Boston Scientific receives medical and other private information about patients, customers, business partners, and employees. This information is governed by strict legal requirements, and we respect the privacy of such information and take steps to appropriately safeguard it. You are expected to protect the privacy of this information as well. Only use patient, customer, and employee information for the business purposes for which it was collected. Only share information with others when they have a legitimate business reason to know it and the disclosure is not prohibited. In addition, transfers of personal data between countries may be restricted or require special legal agreements, and the movement of this data outside of Boston Scientific must always be encrypted. As always, follow the Code, Company policies and procedures, and applicable legal requirements.



Questions & Answers

Q I have a list of patients who have received a Boston Scientific device. Some of them have done very well and have had an excellent experience. Can I send an email to my area managers telling them about the success and naming the patients?

A No. Patient names are protected health information and can only be used or disclosed for specific purposes to authorized individuals. Do not send messages with patient information except to a member of your team supporting a patient case and only for authorized purposes. Other examples of protected health information may include patient addresses, medical record numbers, model and serial numbers of products implanted in a patient, procedural information (e.g., procedure dates and times), telephone numbers, email addresses, social security numbers, age, or any other information that relates to the physical or mental health condition of an individual; the provision of health care to an individual; or payment for health care to an individual. If you want to provide feedback about these successes, you can send an email to your managers, but without information that could identify the patients.

Q My Vice President of Marketing sent our field sales force a slide presentation that includes some scientific data from recent journal articles about the effectiveness of our product as compared to our competitor's product. The presentation is marked "Confidential" and "Internal Use Only" would it be okay if I sent the presentation to a few physicians I call on who are also consultants for Boston Scientific?

A No. Any Boston Scientific documents marked "Confidential" and/or "Internal Use Only" may not be shared outside of the Company, even if you think the information would be helpful in advancing our business. If there is material designated as internal or confidential that you believe should be used externally, then you should contact the originator of the materials and request that they follow the appropriate process to have the material reviewed and approved for external use.



Be Careful with Records

You are responsible for maintaining accurate and complete business records. Prepare records thoughtfully, always double-check your work, and follow any applicable documentation policies. No one should falsify or improperly change any Boston Scientific records. If you are not sure about the accuracy of information, do not guess. Do what you can to find the correct information or discuss the situation with your manager. For further information, please consult the Good Documentation Practices procedures.

General best practices to ensure business records are accurate and complete include: being accurate with your

time and expense entries, documenting transactions accurately, and ensuring all required information is included. In addition, do not sign someone else's name, including a customer's name or a colleague's name, "white out" information on corporate records, or backdate anything.

Familiarize yourself with the retention policies and schedules that apply to the Company records in your possession or control. Retain and dispose of Company records according to Boston Scientific's document retention policies. Records involved in litigation or a government investigation may have other document

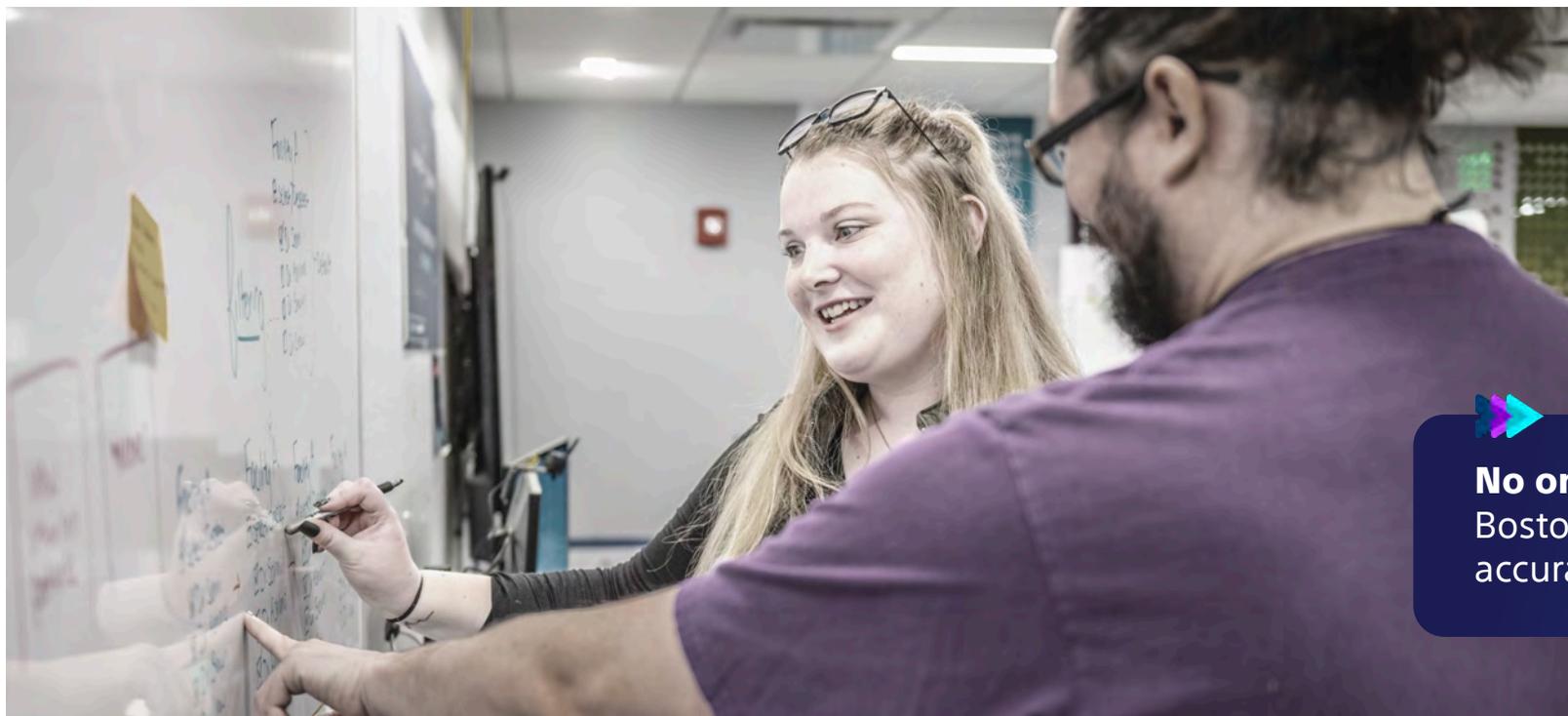
retention requirements. For questions about document retention and classification, contact any of the [resources](#) listed at the end of the Code.

We maintain a system of procedures and accounting controls to keep our disclosures accurate and in compliance with applicable legal requirements. You should always follow Company procedures for reporting and disclosing financial information, and cooperate with internal audit processes as requested. For questions about financial records, contact the Corporate Controller.

Questions & Answers

Q I have been asked to sign a financial report that I believe contains inaccuracies. What should I do?

A If there are inaccuracies in the report, they need to be corrected. You should discuss this with your manager and explain why you think there may be inaccuracies. If after discussing the inaccuracies with your manager, you do not think they have been adequately addressed, or if you are uncomfortable speaking with your manager, pursue the issue by contacting any of the [resources](#) listed at the end of the Code.



No one should falsify or improperly change any Boston Scientific records. If you are not sure about the accuracy of information, do not guess.



Maintain a Safe and Healthy Work Environment

We are responsible for maintaining a safe and healthy workplace, respecting the environment, and conserving natural resources. By protecting the environment, we help ensure the health, safety and well-being of our employees. Do not diminish your safety, or the safety of other employees, in how a task is done. Everyone at Boston Scientific is responsible for their and their co-worker's safety. This means you are expected to:

- Follow all applicable environmental, health, and safety requirements.
- Follow applicable laws and Company policies concerning the use of prohibited substances while at work, on Company business, at a Company-sponsored or paid-for event, or while representing the Company in the course of your work.
- Report unsafe working conditions immediately through your local systems (e.g. safety observation cards) or to your manager.
- Take action to correct unsafe working conditions yourself, if safe to do so and appropriate. If you are unsure of the correct actions to take, report the condition to the local Environment, Health & Safety team, consult your manager, or contact any of the [resources](#) listed at the end of the Code.
- Handle any hazardous materials properly.
- Dispose of all waste according to Company policies and the law.
- Follow security procedures.
- Use resources efficiently and strive to reduce, reuse and recycle waste wherever possible.



Questions & Answers

Q I need to dispense cleaning chemicals into small drums for use on the production line. I am unsure of the hazards of the chemicals or what personal protection I should wear. What should I do?

A If you are unsure of the correct actions to take, contact your local Environment, Health & Safety team or consult your manager or your manager's manager before you proceed any further. Never take risks when it comes to handling potentially hazardous materials. Ensure you have completed all appropriate training on dealing with chemicals.



Maintain a Secure Work Environment

We are responsible for keeping our work environment secure. Boston Scientific does not tolerate any type of workplace violence committed by or against any individual, including the following:

- Violence or a threat or implied threat of violence, expressed through any means of communication (e.g. letters, emails, social media, photographs, verbally, etc.).
- Threatening language or any other acts of aggression, violence, or physical intimidation made by or against any employee or Boston Scientific-affiliated individual (e.g., independent

contractor, vendor, distributor) regardless of whether the conduct occurs on or off premises, during or outside the regular work time, regardless of the means of communication.

- Destroying, defacing or damaging property belonging to the Company, its customers, vendors, visitors or employees intentionally or unintentionally in the course of a threat of a violent act or violence itself.

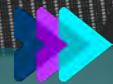
Employees of Boston Scientific should help to ensure that our facilities are secure at all times. This means you should not allow a person into a Boston

Scientific building without swiping this person's badge beforehand. If a person is following you and has no badge, direct the individual to the security desk at the entrance of the building and immediately report this person to Global Security.

You must inform Global Security if there is any situation, including in your personal life, that could put you or other Boston Scientific employees at risk (e.g., a dangerous individual who may attempt to come to your Boston Scientific workplace). Global Security will confidentially take all appropriate measures to protect you and all individuals within our workspace.



As an employee at Boston Scientific you are responsible for **keeping our work environment secure.**



How Does **Integrity** Affect My Business Interactions **Outside the Workplace?**

Acting with integrity means that Boston Scientific employees deal fairly and honestly with others and comply with all applicable laws and government regulations. Integrity is the foundation of good relationships (e.g., with customers, government representatives, vendors and other third parties) and everything we do in and for our Company.



Build Trusting Customer Relationships

Enduring customer relationships are based on integrity and trust. Boston Scientific expects all product information to be truthful, accurate, complete, fully informative, fair, and consistent with the product's approved labeling and applicable legal requirements. All sales and marketing materials must be based on facts and documented research. They must include all information required by applicable laws and be pre-approved per our Company policies and procedures. Never sacrifice integrity to make or maintain sales. Our marketing and sales activities should not encourage customers or their representatives to place their

personal interests above those of their employers or patients.

All items of value, payments, and business courtesies, including meals, must:

- Comply with legal requirements, generally accepted ethics, and the standards of the recipient's organization.
- Comply with all applicable Company policies in effect in the countries where we do business.
- Be consistent with Boston Scientific's commitment to integrity.

Some physicians and other health care providers are not only our customers but also provide valuable services to Boston Scientific. For example, they may conduct research involving our products, provide critical input into our product development, and help us educate other health care providers on the safe and effective use of our products. All interactions with health care providers are potentially subject to close government and public scrutiny. Company policies address these situations and must always be followed.

Questions & Answers

Q I am a sales representative working to attain the business of a prominent cardiologist who uses both Boston Scientific and competitor products. In my conversations with them, I learned that they provide consulting services for our competitor. They offered to switch exclusively to our products if they could perform similar consulting services for Boston Scientific. Is this acceptable?

A No. It is never okay to appoint a consultant as a means to gain or retain business. If the cardiologist has extensive experience using Boston Scientific products, they may be evaluated objectively for the potential provision of consulting services if there is a documented legitimate business need. Consultants must be selected based upon objective criteria, including recognized qualifications, experience, expertise, and professional achievements to meet the need for services to be provided.





Manage Third Parties



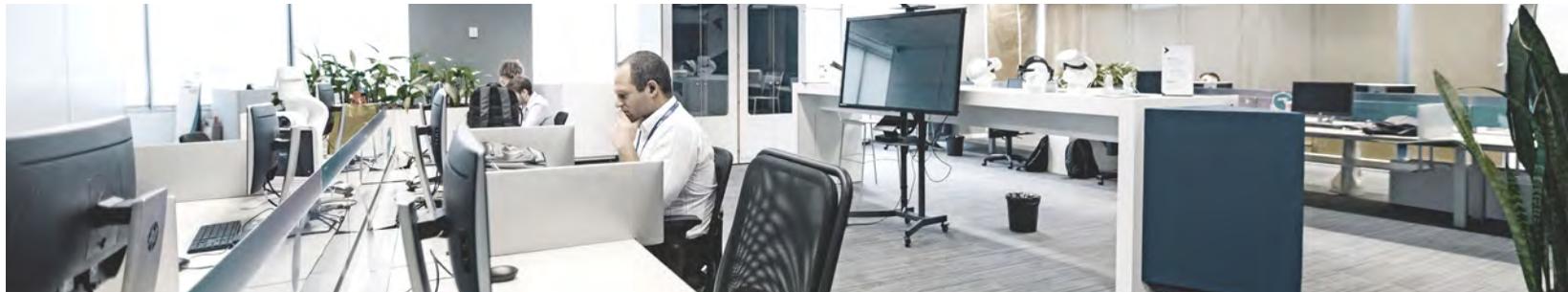
When dealing with suppliers, contractors, consultants, distributors, agents, or other third parties, you are expected to:

- Give third parties a chance to compete fairly for our business.
- Act with fairness and honesty in all dealings.
- Not retain a third party to do anything illegal or improper.
- Consider whether there are any potential conflicts of interest before engaging a third party.
- Choose qualified third parties with a reputation for quality and integrity.
- Make sure all arrangements with third parties follow our policies.

After engaging a third party, be alert to any indicators of unethical or other inappropriate conduct such as the use of child or forced labor. If you have questions or concerns, seek guidance from any of the [resources](#) listed at the end of the Code.

When acquiring goods and services, Boston Scientific makes payments only to the provider of the goods or services. All invoices involving the sale of goods or services must accurately and transparently reflect the

items purchased or sold and their price, discounts, rebates, or free goods. If the discount or rebate is not known at the time of the sale, contact Legal or Global Compliance to discuss requirements. In addition, except in rare cases with Legal pre-approval, Boston Scientific cannot make payment to a provider of goods or services in a country other than the one where the provider of goods or services resides, maintains a place of business, or has provided the services.



Questions&Answers

Q I am looking to engage a new distributor and am following the applicable policies and Standard Operating Procedures (“SOPs”), however, the distributor states that in order to win a tender for Boston Scientific, they need to bid on it immediately. The proposed distributor has not completed the Company’s on-boarding requirements. Is it okay to let the distributor bid on the tender?

A No. Boston Scientific’s policies and SOPs set forth our expectations for doing business with integrity. It is important that we hold our distributors to the same expectations that we have for ourselves. Exceptions must be approved as required by our policies and/or SOPs.

Q I’m supporting Boston Scientific’s business development activities in a new market. I’ve been told Boston Scientific needs to engage a specific consultant to understand the local requirements to setup a new entity. The consultant charges a flat fee and refuses to provide a written description of services or deliverables. Can I engage this consultant with this fee arrangement?

A No. All vendors performing services involving interactions with public officials must have defined service and deliverables with commensurate compensation. Paying a flat fee without understanding the services or deliverables may provide extra compensation to facilitate activities that do not align with Boston Scientific’s core values and behaviors.



Interact with the Government and Other Public Officials Carefully

Boston Scientific has many interactions with government employees and other public officials around the world. In many countries, interactions with government employees and other public officials are governed by very strict rules. Such interactions must not only comply with these rules, but also always be conducted with integrity. You should not do anything that could be viewed as an attempt to improperly influence the decisions of a government, its officials, or its employees or that could be seen as encouraging government employees or public officials to violate rules that apply to them. Never offer or accept anything of value that could be seen as a bribe or kickback. Remember that a bribe is not limited to the exchange of money but could also include the promise or giving of a gift, entertainment, travel, or a favor. If a government employee or public official requests or demands any such benefit, report this immediately to any of the [resources](#) listed at the end of the Code.

Questions & Answers

Q A physician for a European government hospital is turning 50 years old. I would like to give them tickets to see the Soccer World Cup final being held in their city. I don't think I am allowed to give the tickets directly to them, but can I give the tickets to their spouse?

A No. Physicians and health care providers in the public sector are considered government employees and/or public officials in many countries. Giving a gift to the physician's spouse is still a benefit to the public official. Please consult Boston Scientific policies to understand country-specific rules about gifts of any value, as gifts to health care providers and public officials are generally prohibited.

Q A consultant offered to obtain all necessary regulatory approvals in a country for a \$50,000 retainer fee. The consultant said the money would "help the process move faster." I do not know where the money is really going. Is this a problem?

A Yes. This activity sounds suspicious. Boston Scientific must not make any payments that could be construed as a bribe. You should find out what services are actually being provided and what payments the consultant will make on Boston Scientific's behalf, if any. If you cannot obtain this information, you should be concerned about the reason for the payment. Also,

check the status of Boston Scientific's relationship with the vendor: this consultant would be considered a Third Party Intermediary and as such, must go through our Third Party due diligence process. Since you do not know where the money is really going, you should contact Legal or Global Compliance to obtain guidance before responding to the consultant.

Q I am hiring for a position in my department. One of the applicants is the daughter of a high-ranking government employee, one whose influence could benefit Boston Scientific. Can I hire her?

A Maybe. Candidates for any position at Boston Scientific must be evaluated objectively using the criteria established for the position. You cannot create a position and/or hire an individual as a means of potentially influencing or rewarding a government employee or public official, or for gaining business or favor with a health care provider or other customer. You should work closely with Legal and Human Resources to assess whether you can proceed with hiring this individual and, if so, what measures should be implemented to mitigate the risks.



In many countries, interactions with government officials and employees are **governed by very strict rules.**



Be Fair to Others and Engage in Fair Competition

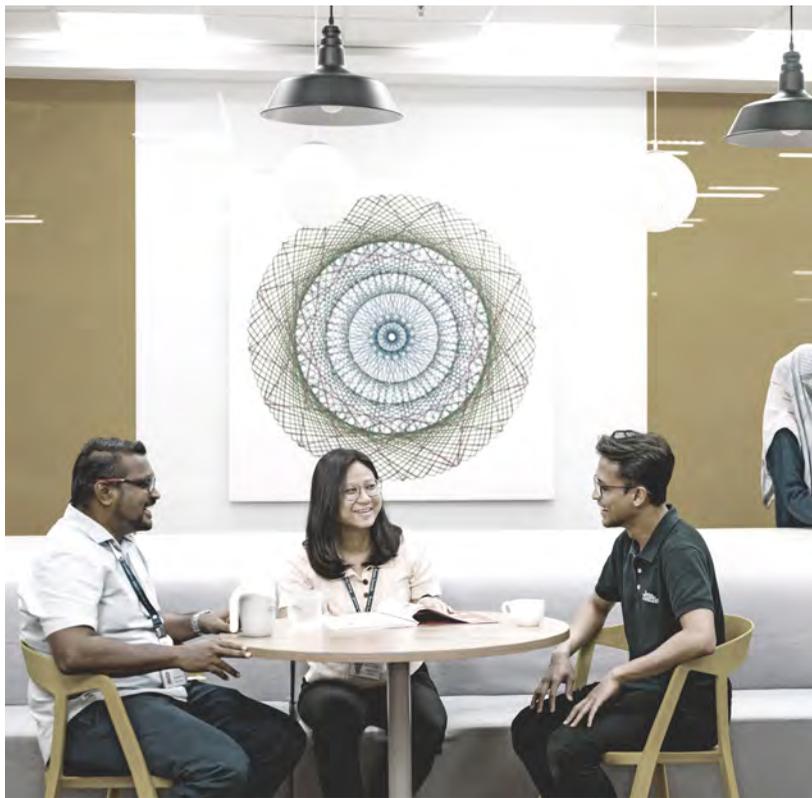
Boston Scientific expects you to deal fairly with others. This means you should not take advantage of anyone by misrepresenting or omitting important facts, or through any other unfair business practice. You should never misrepresent or conceal your identity.

While we seek business-related information about our competitors, we do so through legal and ethical means including the use of information from public documents and forums as well as information obtained from approved market research and intelligence gathering.

You should not obtain confidential information through inappropriate means, such as encouraging a competitive hire to violate their confidentiality obligation to their former employer. Furthermore, avoid spreading rumors about other companies or speculating about the quality of their products. You should avoid even the appearance of illegal or unethical conduct in these areas.

Boston Scientific supports fair and vigorous competition on a level playing field. Antitrust, fair competition, and

anti-monopoly laws help preserve fair competition by limiting abusive behavior. You should not discuss “sensitive topics” with any competitor, trade association, or similar entity. “Sensitive topics” include all aspects of product pricing, terms of doing business, product markets, product development, marketing and sales plans, and key costs, such as research and development or labor costs. End the conversation immediately if a competitor, trade association, or similar entity raises a “sensitive topic.” Then, document your refusal to participate in the conversation and notify Legal.



Questions & Answers

Q In areas where Boston Scientific uses distributors to resell its products, is it acceptable to set or insist upon a minimum resale price, not allowing distributors to sell below this price to end customers?

A No. Distributors are independent resellers and insisting on minimum resale prices may violate competition law and/or the distributorship agreements between Boston Scientific and the distributor. Discuss any such situation with Legal.

Q I have a friend who works at a competitor and we meet for dinner periodically. Is it alright if we discuss how our respective companies are responding to inflationary cost pressures via pricing strategy?

A No. Discussing specific strategy or tactics on pricing with a competitor is never acceptable, even in an informal or social setting.

Q We have products on backorder, and there is not enough product to fulfill the current demands of all my customers. A competitor sales rep in my territory is in the same position. Can we collaborate to “share” customers in our territory until supply returns to normal?

A No. “Sharing” customers with a competitor or agreeing not to compete for the business of certain customers is not allowed under Company policies.

Q We have a very strong market position in the product that I sell but we are feeling competitive pressure from new companies entering the market. We would like to offer customers a significant discount or rebate if they promise to use only our products and not those of the new competitor. Is that alright?

A No. Offering a discount or rebate for a customer to use our products exclusively can prevent fair competition on the market, especially if the Company has a dominant market position. Discuss any such proposals with Legal.



Respect Intellectual Property

Boston Scientific protects its intellectual property rights, including with respect to patents, trade names, trademarks, copyrights, trade secrets, and other intellectual property. We likewise respect the intellectual property rights of others. Contact Legal if you have any questions about:

- Any intellectual property of Boston Scientific or of a third party; or
- Technology licenses, disclosure agreements, software contracts, or any other agreement relating to intellectual property.

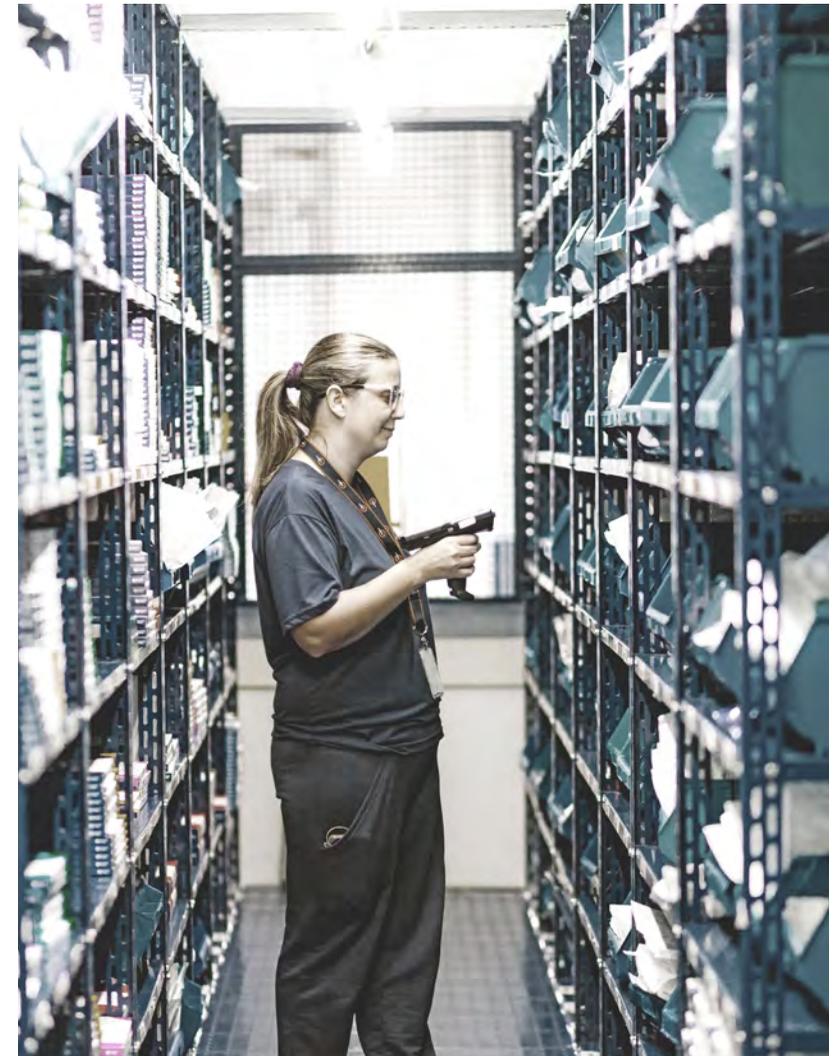
Questions & Answers

Q One of the employees I supervise previously worked for a competitor. He told me he still has the competitor's quality procedures, which are not publicly known. He asked whether I wanted to look at them. What should I do?

A Do not accept or review the information. In line with our commitment to integrity, we will not use such information even if it comes into our possession. You should also help your employee better understand his obligations to his former employer. If your employee is in possession of the competitor's confidential information, you should contact Legal.

Embrace Corporate Responsibility

Corporate Responsibility is how we integrate social, environmental, and ethical principles through collaboration with all our stakeholders, including employees, customers, investors and communities by creating value responsibly and supporting the protection of our planet, people and property. It is our responsibility to act as a good corporate citizen in the communities where we live and work, which includes supporting educational programs for students, health initiatives, employee community outreach programs and environmental sustainability efforts.



Boston Scientific supports **fair and vigorous competition** on a level playing field.



What **Additional Laws** or **Requirements** Should Guide **My Commitment to** **Integrity?**

We work in a highly regulated environment. It is critical for you to be aware of any requirements that apply to your work activities. These may include rules about clinical research, product development, manufacturing, product promotion, privacy and data protection, customer interactions, and billing for our products and related services. There are also laws governing other activities, such as import and export requirements, transferring personal data across borders, stock trading rules and requirements covering political activities and contributions. You may need to know how to engage with the media, government, and outside attorneys. Being familiar with and abiding by all applicable requirements are key components of integrity and quality in the workplace.

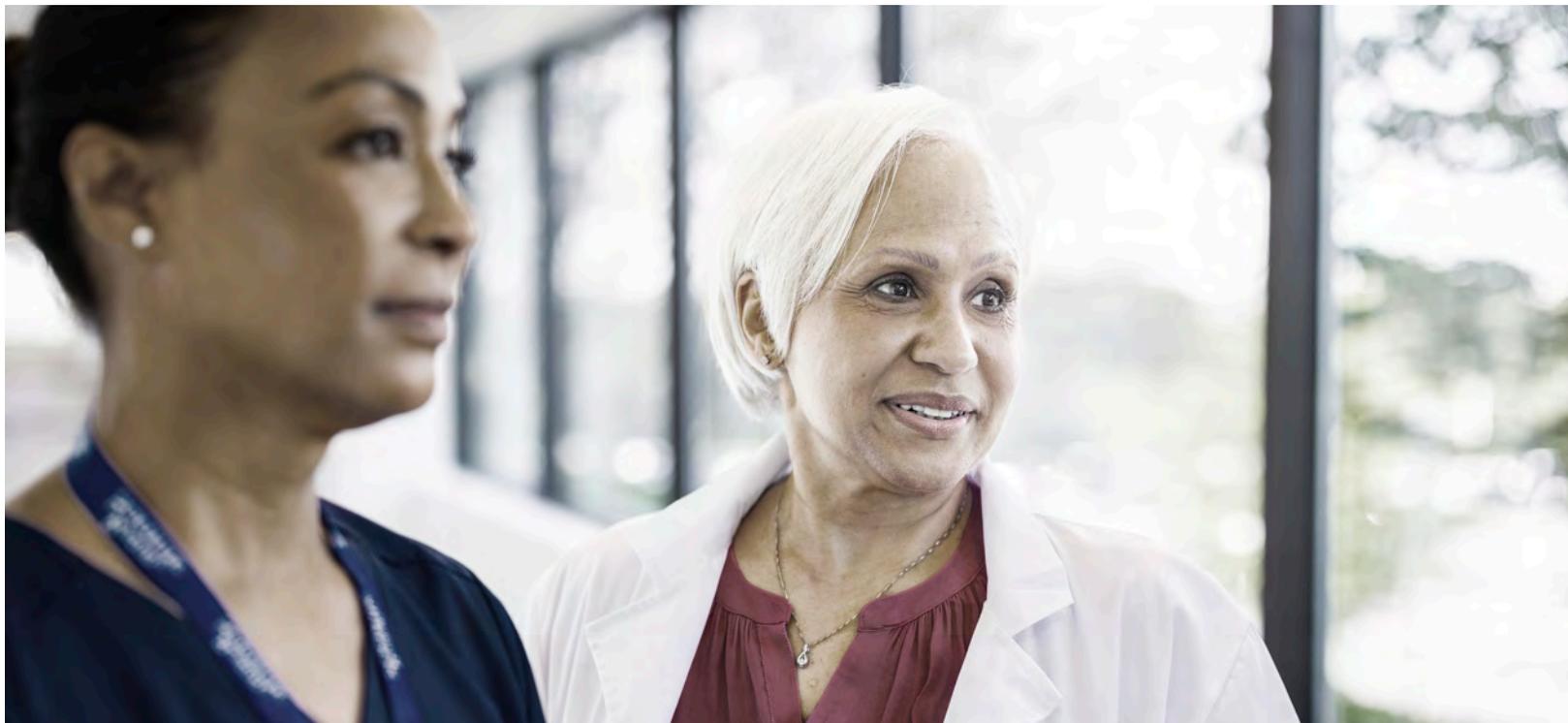




Be Aware of Clinical, Regulatory, and Health Care Program Requirements

Boston Scientific's products are closely regulated by government agencies, health ministries, and other regulatory authorities worldwide. Boston Scientific expects you to comply with all clinical, regulatory, and health care program requirements in the countries where we do business. The laws and regulations that apply to medical device companies continue to evolve. You must be aware of the laws and regulations that affect your job. If you are unsure, you should ask your manager or contact Global Compliance or Legal.

Boston Scientific does not hire or retain people to work in our U.S. operations who have been declared ineligible by a U.S. government agency from participating in a U.S. government health care program or drug development process. Boston Scientific searches applicable U.S. government databases for such ineligible persons. If you are a U.S. employee who is, or learns that you may become, an ineligible person, you must immediately disclose this to Global Compliance.



Questions & Answers

Q What if a health care provider asks me about an off-label use for a Boston Scientific product?

A If you are asked about off-label use, tell the health care provider that safety and efficacy for that use have not been established and explain that the Company does not promote off-label use. Answer the question in a truthful, non-promotional manner and do not expand the discussion or encourage off-label use. Discussions that focus on off-label use, even if started by a physician, could be viewed as off-label promotion. Your discussions should focus on information that has been reviewed by the Company through the approval process for use with health care providers.

Q I hosted a business dinner for some employees and health care providers and spent more than the meal spending limit. Can I pay for part of the meal using my personal credit card to offset the overage?

A No. You may not use your personal credit card to pay for the overage. The Company must maintain accurate books and records, and in some countries, there are laws requiring reporting of "transfers of value" to health care providers. You should tell your manager that you spent more than the meal spending limit and provide a detailed explanation of the issue in your expense report. Under no circumstances should you alter the receipt, add names of attendees who were not present at the dinner in an effort to reduce the per person cost, or otherwise provide inaccurate information in connection with the dinner.



Understand Stock Trading Rules

If you trade in Boston Scientific stock, take care not to engage in “insider trading.” Insider trading means engaging in transactions in a company’s securities (for example, buying or selling a company’s stock), while aware or in possession of “material nonpublic information” about the company or its securities. When considering whether information is “material nonpublic information,” ask yourself questions such as:

- Has the information been released to the public by the Company, or is the information otherwise known generally to the public? If not, it is nonpublic information.

- Would a reasonable investor consider the information to be important when making an investment decision? If yes, it may be material.
- Would public disclosure of the information reasonably be expected to affect the price of Boston Scientific securities? If yes, it may be material.

It is also prohibited to give a “tip” to anyone — including other Boston Scientific employees, family, or friends — to enable trading in Boston Scientific stock based on material nonpublic information.

Remember that these rules do not just apply to Boston Scientific’s securities and information. Insider trading can extend to trading in the stock of our competitors and other businesses (including a company where Boston Scientific has made an investment or is considering a potential acquisition or investment). Therefore, please take the same insider trading precautions with any information you learn about third parties from your job at Boston Scientific. You should review the Company’s Stock Trading Policy before engaging in any transactions in the Company’s securities. Please contact Legal with any questions.

Questions & Answers

Q I am not sure what “material nonpublic information” means. How do I know when I have it?

A In general, information is material if its public disclosure could reasonably be expected to impact the price of a company’s securities or a reasonable investor’s decision about buying or selling securities. Material information can include financial results, executive management changes, government investigations, business acquisitions or sales, clinical results or new product approvals or launches, and product recalls among other things. Information is nonpublic if a company has not issued a press release or otherwise widely distributed the information to the public, and it is not otherwise generally known to the public. If you are unsure whether you have material nonpublic information, you should contact your manager or Legal before trading.





Know How to Engage with the Media, Government and Attorneys



As a New York Stock Exchange (“NYSE”) listed company, there are strict rules regarding what can and cannot be communicated about the Company, to who and when. Digital advancements, including the use of social media, mean we live in an increasingly connected world. What we say to one set of stakeholders can be shared in seconds and may have unintended consequences. Our Company communications are carefully managed by the Corporate Communications, Investor Relations and Government Affairs teams, often in partnership with Legal. You should not engage with the news media (including speaking with journalists), the finance community or government representatives without first having been authorized to do so by an accredited member of one of these teams. We expect you to follow these guidelines:

- Never comment on, confirm, or deny anything relating to Company business, unless you are expressly authorized by the Company to do so.
- If a member of the news media contacts you, refer this person to Corporate Communications.
- If an analyst, rating agency, or investment banker contacts you, refer this person to the Investor Relations Department.
- If any outside attorney or government official contacts you relating to Company matters, contact Legal.
- If you receive a summons, legal complaint, subpoena, or similar legal document relating to Company matters, contact Legal. You should also follow any applicable local policy.

Questions & Answers

Q I know someone from another company who was approached by a government official at a conference. The official asked detailed questions about their job and company that made them uncomfortable. What should I do if that happens to me?

A You should ask to see the official’s credentials, get contact information, and tell them you would like to check with the Company before proceeding further and refer them to the appropriate Boston Scientific representative to answer their concerns. You should then talk to Legal immediately. Boston Scientific cooperates with government representatives. However, Legal should understand the situation before anyone provides Company information to ensure that the appropriate Boston Scientific representatives are engaging with the government.



Be Aware of Import, Export, Anti-Boycott and Anti-Money Laundering Laws

Many countries in which we operate have laws controlling the import and export of technology, personal information, medical devices, and other goods. Governments also periodically impose trade restrictions on certain countries, entities, and individuals.

Some countries have enacted laws that prohibit doing business with other countries. These laws are commonly referred to as boycotts. All requests for Boston Scientific

to cooperate in a boycott must be reported immediately to Legal. Also, you should report any requests for information about our dealings with countries under boycott. We are required by law to report certain requests to the government, but this should be done by the appropriate Boston Scientific representatives.

Laws also exist related to international business transactions executed by or on behalf of Boston

Scientific including transfers of products, provision of services and receipt of funds. Money laundering is the attempt to conceal the proceeds of illegal activity, so the proceeds appear to come from a legitimate source or activity. Generally, giving or receiving cash for Company transactions is prohibited. You must be aware of the laws and regulations that affect your job. If you are unsure, you should ask your manager or contact Global Compliance or Legal.



Questions & Answers

Q A third-party sales agent requested that we pay its commissions to a different entity located in a different country. Is this permissible?

A No. Payments to entities other than those that provide goods or services to Boston Scientific and in countries other than where the goods or services are provided are generally not permitted. These types of arrangements raise concerns of potential improper conduct and Boston Scientific generally prohibits such arrangements. There may be circumstances where there is a legitimate, compelling and documented rationale for such an arrangement, but it must be approved by Legal.



Contact Legal whenever questions arise about political contributions or import, export, anti-boycott, or anti-money laundering laws.



Understand Restrictions Involving Political Activities and Contributions



Everyone is free to participate in the political process. However, in doing so, you may not create the impression that you are speaking or acting on Boston Scientific's behalf unless you are working with the Company's Government Affairs team.

It is your responsibility to obey all laws relating to political contributions. Donations of any type must follow the principles of the Code and applicable policies. Boston Scientific cannot contribute money, time, services, or property to a political candidate or party unless it is permitted by local law, made through a specifically designated political entity, and approved beforehand by a Senior Vice President or higher, in coordination with Government Affairs. If you have questions about making a political contribution, you should contact Boston Scientific's Government Affairs team for further guidance.



It is your responsibility to obey **all laws relating to political contributions**. Donations of any type must follow the principles of the Code and applicable policies.



What Should I Do if I Have a **Question** or **Concern**?

Let your voice be heard. If you ever feel your integrity is being compromised, contact any of the [resources](#) listed at the end of the Code. Also, support those who raise concerns in good faith and cooperate with investigations. Educating yourself about the right choices is a big part of making integrity real every day.





Raise Questions and Concerns

Integrity concerns arise and can involve good people with the best intentions. Knowing just what to do can be difficult. If you are not sure, ask for advice from someone you trust or contact one of the [resources](#) listed at the end of the Code, such as the Advice Line. You can use the Advice Line to ask a question, obtain guidance, or report an integrity concern. We all have a responsibility to immediately raise any integrity concerns, or known or suspected violations of the Code, Company policies and procedures, and applicable laws. If you are not sure what to do, ask questions and seek advice.



Questions & Answers

Q Can I call the Advice Line and remain anonymous?

A Yes. The Advice Line allows anonymous reporting, except where local law restricts it. In those situations, callers are referred to an alternative resource. If you choose not to give your name when you report a concern, however, it may be more difficult to ask follow-up questions, provide you with possible solutions to your concern, or information about its resolution. If you do choose to provide your name, your identity will be kept as confidential as possible under the circumstances.



Support Others Who in Good Faith Ask Questions or Raise Concerns

Boston Scientific does not tolerate any form of retaliation against an individual arising from a good-faith report of a Code, policy and procedure, or integrity concern. Retaliation is also prohibited against anyone who participates in an investigation of such a report. This includes reports made to or investigated by the Company, a government, or a government official. Boston Scientific will also not tolerate any other form of retaliation prohibited by applicable law.



**ADVICE LINE
1-888-968-8425
FROM THE U.S., CANADA
AND PUERTO RICO**

**ADVICE LINE
advice.bostonscientific.com
WORLDWIDE INTERNET CONTACT**



Cooperate with Investigations

The Company responds promptly and impartially to questions, concerns, and reports of wrongdoing. Investigations are kept as confidential as possible under the circumstances. All of us must cooperate fully with investigation activities by Boston Scientific. This includes an obligation to be completely truthful and candid, sharing all relevant information with persons conducting investigations.



Questions & Answers

Q I raised an integrity concern to my manager and I was removed from the accounts that I was supporting. I think this might be retaliation for raising the concern. What should I do?

A You should contact one of the [resources](#) listed at the end of the Code. Without more information, we cannot know whether retaliation occurred. However, it is important for you, your manager, and the Company to address your perception of possible retaliation. If retaliation did occur, the Company will take appropriate corrective action.



Integrity concerns arise and can involve good people with the best of intentions.

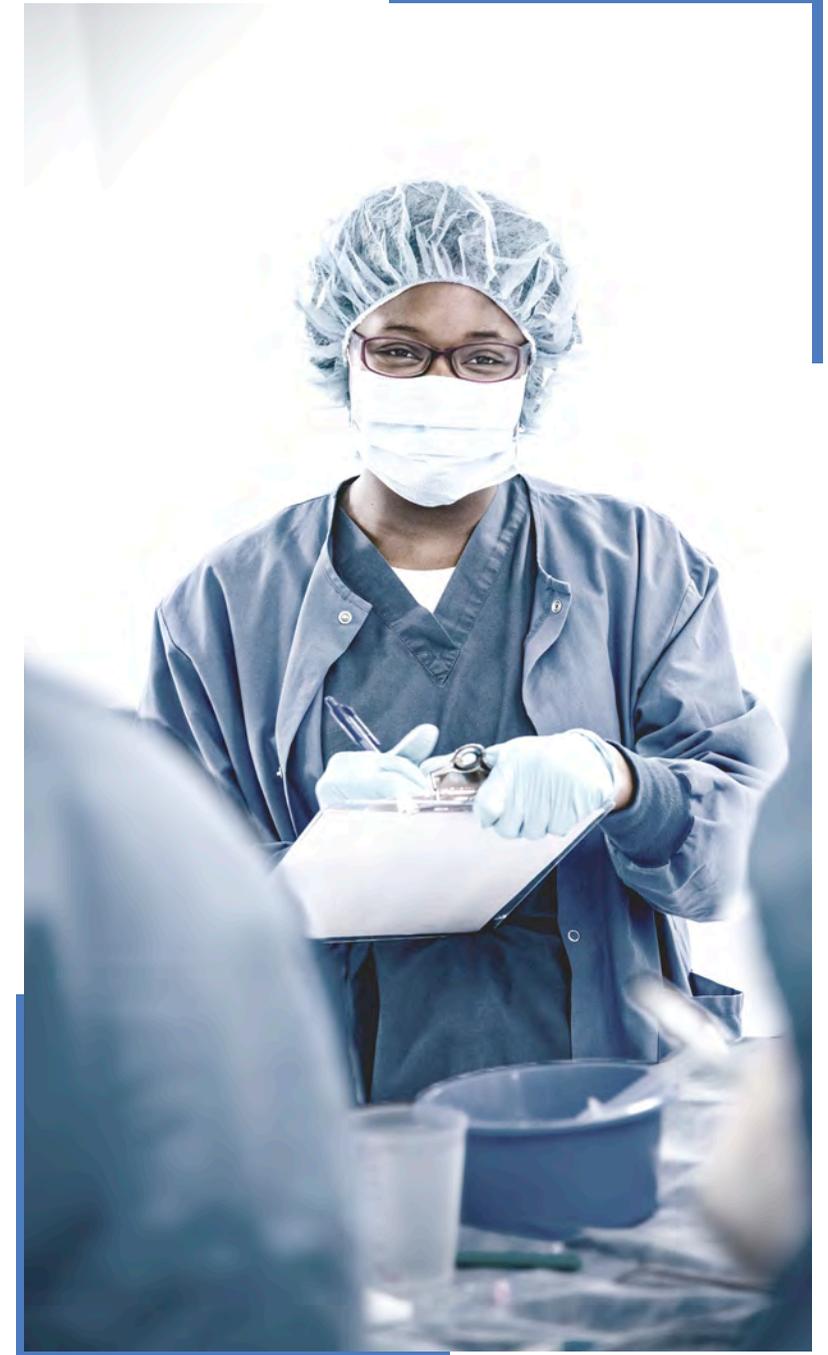


Understand Consequences

Boston Scientific takes violations of this Code, Company policies and procedures, and applicable laws seriously. Where appropriate, the Company takes prompt corrective action, up to and including termination of employment. Corrective action may also occur for other reasons, including if you:

- Direct others to violate a law, regulation, or Company policies and procedures or applicable laws.
- Know of a violation or potential violation, and fail to report it.
- Fail to effectively monitor the actions of people who work for you.
- Fail to cooperate in a Company audit or investigation.
- Provide false, misleading, or incomplete information during a Company audit or investigation.
- Fail to participate in required training.
- Retaliate against someone for reporting an integrity concern in good faith or for participating in an investigation of such a report.
- Share confidential information learned during an internal investigation.

Corrective or disciplinary action depends on the nature, severity, and frequency of the violation. It may vary depending upon local law. Violators of the laws and government regulations mentioned in the Code could expose themselves and the Company to substantial civil damages and criminal penalties, including prison terms.





Reporting Concerns & the Investigation Process





Resources for Asking a Question or Reporting a Concern

Several options exist to help you ask a question or report a concern. Below is a list of resources available to you:

1 Your manager or manager's manager

2 The Advice Line:

- An online portal located at advice.bostonscientific.com.
- A confidential, toll-free telephone number that anyone can call, 24 hours per day, seven days per week. From the U.S., Canada, and Puerto Rico dial: **1-888-968-8425**.
- From all other Boston Scientific locations, use the phone numbers listed at advice.bostonscientific.com. The Advice Line handles calls in multiple languages.

3 Global Compliance, Human Resources, Legal, Global Security, and Global Internal Audit.

