

Summary of Revisions to Boston Scientific's Code of Conduct

On November 13, 2019, the Board of Directors of Boston Scientific Corporation (“Boston Scientific”) approved an updated and revised Code of Conduct, effective January 1, 2020. The changes to the Code of Conduct (the “Code”) include the following:

- Updated guidance on interacting with third parties;
- Enhanced conflict of interest guidance;
- Additional guidance on reporting sexual harassment;
- New section on Corporate Social Responsibility;
- Updated language on data protection laws and protection of personal data;
- New and updated Q&A’s illustrating the application of various provisions of the Code; and
- Other administrative and non-substantive changes.