

Creating Value Responsibly

Boston Scientific is committed to conducting business with unwavering ethics, strong corporate governance and regulatory compliance.

We insist on integrity in all our working relationships inside and outside the company. Our practices protect human rights, promote accountability and ensure that we act responsibly as a global citizen.



SCIENCE

**Innovating
with integrity**

.....

HUMANITY

**Respecting
human rights**

.....

PURPOSE

**Creating value
responsibly**

.....



Jessica Pill leads our efforts to ensure compliance with regulatory requirements while acting with integrity and living our core values.

“Despite how we’ve had to change the way we work this year, we are doing our part to keep each other safe and live our values while continuing to serve patients and navigate challenges together.”

Jessica Pill, chief compliance officer and vice president, Compliance

Compliance, Ethics and Integrity

Our work contributes value to the lives of patients, employees and people in communities around the world. Social responsibility is built into how we deliver innovations, collaborate and operate. Our employees have a shared commitment to:

- Act honestly and ethically in all company matters.
- Protect the privacy of patients, customers and employees.
- Treat one another with respect and fairness.
- Hold one another accountable to ensure quality in everything we do.

The Boston Scientific global compliance team provides employees with the resources and training they need to do business with integrity, treat customers and suppliers fairly, and report ethics concerns when they arise. Led by our chief compliance officer, the team collaborates across the company to monitor our activities and performance. The chief compliance officer reports quarterly to the risk committee of our board of directors and more frequently as needed.

Code of Conduct

Every employee is required to read and understand the Boston Scientific [Code of Conduct](#), which is the foundation for all our business practices and relationships. Employees complete annual training on the Code of Conduct, as well as multiple mandatory training courses throughout



the year that reinforce company policies, explain corruption- and compliance-related risks and provide resources for reporting concerns. Many of these trainings offer scenario-based content that help people respond ethically to issues they may face in their daily work.

We continually assess opportunities to adapt our Code of Conduct in light of developments in the global marketplace, including emerging technologies and business practices. In January 2020, we released an updated Code of Conduct with greater specificity about privacy rights, new language about maintaining a safe and healthy work environment, additional details about data privacy and expanded guidance on conflicts of interest.

"INTEGRITY TOGETHER" CAMPAIGN

We regularly promote employee awareness of the Code of Conduct and Non-Retaliation Policy. In 2020, our week-long integrity campaign featured video messages from senior leaders and interactive virtual events that emphasized the importance of working ethically. In addition, regional and country leaders

**Integrity
together**

reinforced the campaign through local email messages, videos and online roundtables.

Non-Retaliation Policy

The Boston Scientific Non-Retaliation Policy is an essential component of our compliance program. It prohibits any form of retaliation, direct or indirect, against an individual who raises a concern in good faith. This protection extends to anyone who assists with, or cooperates in, an investigation or report of misconduct.

Advice Line

All employees are responsible for immediately reporting any suspected violation of the Code of Conduct and related company policies. Ethics concerns may be confidentially reported through the Boston Scientific Advice Line. The toll-free, 24-hour service is operated by a third party seven days a week in multiple languages.

Global Human Rights and Labor Standards

We adhere to human rights and labor laws in every location where our company operates. In 2020, we finalized the [Boston Scientific Human Rights Policy](#), which articulates our commitment to promoting human rights principles as recognized and understood by the international community. These principles include vigilance against modern slavery, human trafficking, bribery, discrimination and harassment.

Our human rights policy supports and is guided by the principles of the United Nations (UN) International Bill of Rights as well as:

- The Universal Declaration of Human Rights.
- The UN Guiding Principles on Business and Human Rights.
- The International Covenant on Economic, Social and Cultural Rights.
- The International Labor Organization Declaration on Fundamental Principles and Rights at Work.
- Global Reporting Initiative Sustainability Reporting Standards.

We also adhere to disclosure requirements under the California Transparency in Supply Chains Act and the U.K. Modern Slavery Act.

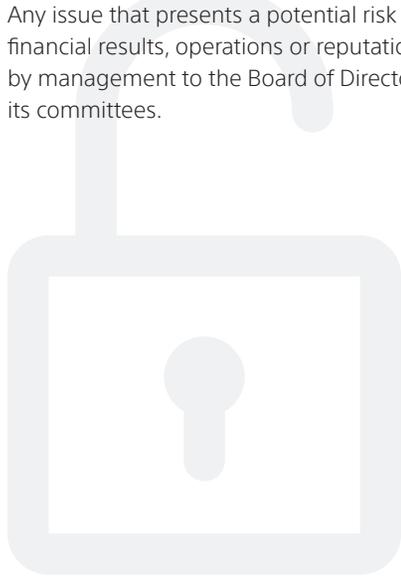
EQUIPPING LEADERS TO ADDRESS EMPLOYEE CONCERNS

As the pandemic changed how we work, we continued our Open Doors initiative using online resources to ensure managers could maintain a virtual open door with employees, including those with compliance concerns.



Risk Management and Global Security

Under the oversight of our board of directors, our enterprise risk management team supports company leadership with guidance to achieve performance objectives. The team analyzes strategic, operational, financial, legal and compliance risks to ensure we can adapt to challenges, pursue opportunities to help patients and meet commitments to stockholders. Led by our vice president of global internal audit, our risk management experts identify enterprise-level developments that could be barriers to meeting customer and patient needs or preserving and growing stockholder value. Any issue that presents a potential risk to the company's financial results, operations or reputation is reported by management to the Board of Directors or one of its committees.



BEST-IN-CLASS GLOBAL SECURITY



The Boston Scientific global security and resiliency team was ranked in the top 10 of all U.S. manufacturers' security departments in Security magazine's 2020 [Security 500 rankings](#). The team's leadership has also [been recognized](#) for its commitment to diversity, equity and inclusion.



RISK MANAGEMENT:

PREPARING TO HANDLE ANY SITUATION

Matt Sprague leads our team of risk management experts that identify enterprise-level developments that could be barriers to meeting customer and patient needs.

“The COVID-19 pandemic has broadened our definition of risk and expanded the scenarios we plan for in our risk management approach and processes, resulting in sharper action plans, escalation paths and lines of communication.”

Matt Sprague, vice president, Global Internal Audit



Business Resiliency

The Boston Scientific business resiliency strategy ensures that we can sustain operations and secure our facilities in the event of a crisis. Our global security and resiliency team plans and prepares for a range of potential threats, including wildfires, tornados, earthquakes, hurricanes and the effects of climate change. They use risk and impact assessments to plan for disasters or events that could interfere with our ability to deliver products for patients or jeopardize the safety of our people, suppliers or communities. The team also works closely with our IT disaster recovery experts to identify technology vulnerabilities so we can make the right investments to keep company operations secure.



When COVID-19 cases first emerged, our security, resiliency and medical teams acted quickly to protect our people and business operations while taking steps to ensure that our devices and therapies would continue to reach patients. Our employees provided on-site support to customers in accordance with guidance from local health authorities, as well as hospital protocols. To prevent on-site outbreaks and ensure extra safety, employees who could perform their job functions from home worked remotely with flexible work arrangements. We also shipped personal protective equipment (PPE) to company locations for employees' use, provided COVID-19 testing for employees and issued pandemic guidance for teams globally. Based on virus-tracking data, we implemented new safety protocols, adapted facilities for social distancing and rolled out plans for the tiered resumption of manufacturing operations in locations where case counts subsided.

BUSINESS CONTINUITY: RESILIENCY AND THE GLOBAL PANDEMIC



Ty Harris leads the company's business resiliency efforts to help ensure continuity in operations and safety for our employees.

“We have a strong global resiliency model to protect the enterprise in the event of a crisis. In early January, when our global intelligence team alerted us to the COVID-19 outbreak in Wuhan, we were able to act immediately to anticipate the extent of the threat and keep employees safe. With new protocols and work streams, we kept critical operations intact and created work environments without community-spread at our sites.”

Ty Harris, director, Global Security and Resiliency

Protecting Global Assets

Our global security and resiliency team ensures the safety of our people as well as enterprise assets and operations. The team uses industry-standard protocols and global situational awareness tactics to manage our security posture and to maintain a global security operations center 24 hours a day, seven days a week. Their work to maintain and enhance physical security and cybersecurity is supported by a network of partners specializing in cybersecurity, environment, health and safety, supply chain, global regulation and data privacy.



Governance

The Boston Scientific Board of Directors has well-established [corporate governance guidelines](#) and adopted written charters for each of its standing committees (audit, executive compensation and human resources, risk, nominating and governance). Our Code of Conduct reflects the company's commitment to good corporate governance and compliance with the rules and listing standards of the New York Stock Exchange and other legal requirements.

Global Tax Strategy and Compliance



Our business makes a positive economic and social impact around the world, strengthening the communities where our people live and work. In keeping with our commitment to social responsibility, we prioritize our role as a responsible taxpayer. We comply with all applicable tax laws, regulations and related disclosure requirements in every jurisdiction where we operate. Our tax professionals are committed to the highest compliance standards and use processes based on standardization and automation to minimize our tax risk.

Political Involvement and Contributions



Boston Scientific supports public policies that promote diversity, equity and inclusion and improve patient health, our employees' lives and the communities we serve. We advocate for policies that focus on increasing patient access to life-changing and life-saving technologies. The company [posts annual updates](#) on contributions to political action committees, corporate contributions to state officials and memberships in associations that engage in public policy advocacy.

To advance sound public policy, the Boston Scientific Corporation Political Action Committee (PAC) facilitates voluntary political contributions by eligible employees and our board of directors in accordance with federal law. While the PAC supports our company values, it does not accept any contributions made on behalf of any corporations, including Boston Scientific, nor does it contribute to presidential campaigns. The PAC is run by a governing board of senior employees who represent our primary businesses. The nominating and governance committee of our board of directors annually reviews political contributions made by our company and the PAC. Contributions to political candidates are bipartisan, and to be eligible for funding, candidates must meet one or more of the following criteria:

- **Policy alignment:** The candidate is aligned with the company's top public policy priorities; or,
- **Leadership and jurisdiction:** The candidate serves in elected leadership within the Congress and/or sits on a congressional committee with jurisdiction over issues impacting our business; or,
- **Constituency:** The candidate represents a district or state in which a company facility exists and/or serves a significant population of our employees; or,
- **Values and reputation:** The candidate's character and integrity align with BSC's corporate reputation and values.



Setting Industry Standards

Boston Scientific collaborates with trade associations and regulatory bodies around the world to set new standards in quality and stay informed about regulatory developments so we can be agile in our response. We make it a priority to help shape industry and regulatory approaches to quality by sharing the best practices behind our patient-centric systems.

- FDA Digital Health: We are working closely with the FDA through the Digital Health Software Precertification Pilot Program to expedite patient access to safe and effective software-based medical innovations.
- Medical Device Innovation Consortium: We are part of this public-private partnership with the FDA to advance solutions that promote patient access to innovative medical technologies.

Responsible Marketing

Boston Scientific is committed to ethical and responsible marketing and promotion. Our Code of Conduct and other employee policies emphasize the importance of fair and honest communications with patients, customers and the public. The company's sales and marketing training for all customer-facing employees covers fair and honest marketing practices, respect for intellectual property, interactions with physicians and public officials, and conflicts of interest.



2020 Responsible Sales and Marketing Training:

\$1.9 million invested
in sales and marketing training
programs

+12,000 hours of training
for customer-facing employees

Sustainable Supply Chain

The company's manufacturing and supply chain teams lead our efforts to plan, source, manufacture and distribute more than 17,000 products to customers and patients worldwide. More than 22,000 indirect and direct suppliers meet the highest quality standards for materials and service, ethical conduct, and compliance with all applicable laws and regulations. To identify supply chain partners supporting product development and ongoing supply for manufacturing, we use a standardized supplier performance tool that assesses each organization's business practices and corporate citizenship. This protocol enables us to build relationships with responsible, high-performing suppliers who make significant contributions to our work.

PROTECTING SUPPLY CHAIN STABILITY IN 2020



In early 2020, the Boston Scientific global sourcing team shifted resources to keep our supply chain stable; as a result, we did not experience manufacturing outages amid the pandemic. The interventions we took included:

- Tracking supplier status and inventory in risk areas and taking action to prevent shortages.
- Monitoring safety stock levels and building up product supplies as warranted.
- Mitigating risk for technology and material shortages by identifying new vendors.
- Analyzing continuity risks by product family.

Supporting Supplier Diversity

Our approach to supplier selection involves building diversity, equity and inclusion throughout the Boston Scientific supplier network. In 2020, as part of our combating racism strategy, we took steps to further expand the number of Black-owned enterprises that provide supply chain services for our business in the United States. We also supported small and diverse vendors during the pandemic by shortening payment terms for those whose business with us is under \$250,000.

We prioritize partnerships with certified companies that share our dedication to improving the quality of patient care, including businesses that are:

- Minority-owned
- Women-owned
- Small or disadvantaged
- Service-disabled
- Veteran-owned
- LGBTQ-owned
- Disability-owned

PERSPECTIVE ON SUPPORTING SUPPLIER DIVERSITY:

SAKEN KHOKHAR



“I’ve never been more impressed by our diverse network of suppliers than I was in 2020. Each came through to ensure our products were available wherever they were needed in the world. We are proud to partner with businesses with so much diversity of talent and perspective.”

Saken Khokhar, manager, Supplier Diversity

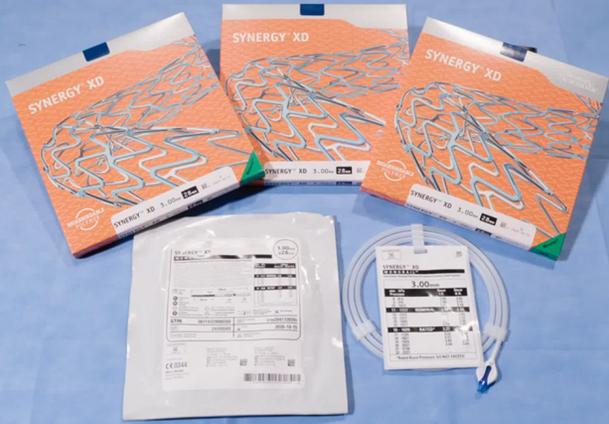


2020 Supplier Diversity:

Worked with **3,200 diverse suppliers**

Spent **\$599 million** on the services of diverse suppliers

PACKAGING MATERIAL EFFICIENCY



The new SYNERGY™ XD Bioabsorbable Polymer Stent single-barrier packaging system reduced total shipping weight by 26.9 metric tons globally.

Packaging and Labeling

Packaging practices at Boston Scientific reflect the critical need to ensure the highest quality sterilization, distribution, storage and use of our medical devices. We collaborate with customers and conduct usability assessments to ensure we are meeting their needs and requirements. The company has controls in place to verify that our product labeling meets global labeling regulations and all internal quality standards.

Sustainability in Packaging and Labeling

We develop packaging sustainability goals under the guidance of a global sustainability packaging and labeling steering committee. Our packaging and labeling practices include optimizing design, reducing waste and limiting emissions from shipping. In 2020, we conducted a global survey with customers to learn more about their sustainability practices and how we can work together to reduce waste and emissions. As a member of the Healthcare Plastics Recycling Council, we participated in its work to increase the recycling of plastics in clinical settings. This work has improved our ability to trace raw materials and learn how our customers dispose of the plastics used to safely deliver our products.

Boston Scientific packaging teams routinely share case studies to communicate the company's support for sustainability and to share successful practices with our global teams. In 2020, we shared the following accomplishments:

- Packaging consolidation: By consolidating sterile barrier systems and sourcing more packaging materials locally in Clonmel, Ireland, the Neuromodulation team avoided using 755 kg of plastic and 1.03 metric tons of carbon emissions.
- Cold chain packaging redesign: By developing new packaging for SpaceOAR™ Hydrogel and SpaceOAR Vue™ Hydrogel that uses cold chain technology, we shipped more product per pallet and extended the time products can spend in transport.
- Packaging material efficiency: By shifting from two-pouch packaging to a single-pouch and thinner carton for the SYNERGY™ XD Bioabsorbable Polymer Stent, we reduced total shipping weight by 26.9 metric tons worldwide.

REDUCING WASTE WITH ELECTRONIC INSTRUCTIONS

To reduce paper waste, we host an [eLabeling website](#) where customers can download Instructions for Use (IFU) for an increasing number of Boston Scientific products. Many IFU booklets that were previously printed and shipped with devices are now available online in multiple languages. By converting to electronic-only instructions for customers in Korea and Russia, we cut paper waste in the region by 35 metric tons in 2020.



2020 Packaging Sustainability Snapshot:

164 metric tons of packaging removed from waste stream

1,100 acres of forest saved

5,300 products diverted from landfills during development

697 pallet shipments avoided