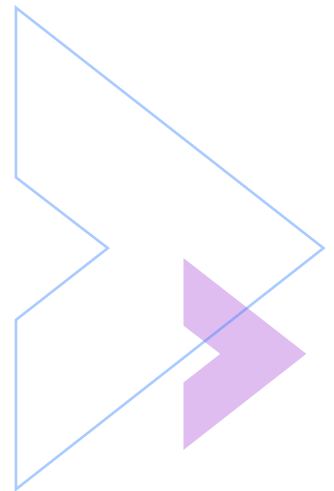
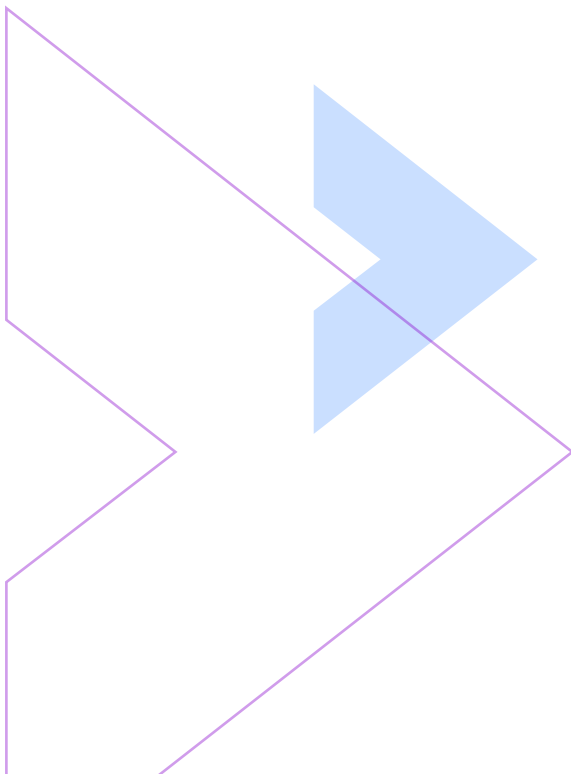




# Supplier Code of Conduct

*Effective Date: February 2026*



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

## **Boston Scientific Supplier Code of Conduct**

This Supplier Code of Conduct (the “Code”) sets forth Boston Scientific’s expectations for its suppliers regarding corporate responsibility in the supply chain and provides information and guidance on how you must conduct your business with ethics and integrity. Boston Scientific is committed to corporate responsibility practices and acting with integrity in everything we do. Corporate responsibility practices are essential to meet and exceed the needs of the present without compromising the ability for future generations to do the same. We recognize the importance of corporate responsibility including managing the social, environmental, and economic impacts of supply chains therefore, Boston Scientific expects its suppliers to act ethically and responsibly in alignment with universal principles as outlined herein. Boston Scientific seeks partnerships with suppliers who share our commitment to integrity and full compliance with the laws and regulations applicable to our business. Boston Scientific’s commitment to corporate responsibility extends to basic human rights including labor rights, climate resilience, environmental protection, inclusive economic growth, and ethical business practices. Boston Scientific expects our suppliers to adhere to the following:

- United Nations Principles on Business and Human Rights
- Guide to Corporate Sustainability – UN Global Compact
- UN Universal Declaration of Human Rights
- International Labor Organization (ILO) – Declaration of Fundamental Principles & Rights at Work
- The California Transparency in Supply Chains Act (as applicable)
- The UK Transparency in the Supply Chains Act – Modern Slavery Act (as applicable)
- Exhibit 1 contains other standards and guidelines Boston Scientific expects suppliers to follow (as applicable)

Boston Scientific understands the importance of aligning with the principles set forth in the UN Global compact and expects its suppliers to work diligently in the areas of human rights, labor, environment, and anti-corruption. Boston Scientific and its suppliers are required to comply with all relevant environmental regulations and sustainable & ethical business practices. We reserve the right to investigate compliance with this Code and take violations of this Code and applicable laws seriously. Where appropriate, Boston Scientific will take prompt remedial action, up to and including termination of your agreement with Boston Scientific.

The Supplier declares its support for the code and actively pursue conformance to the code.

## Human rights and labor

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Boston Scientific respects and strictly adheres to all applicable labor and human rights laws & regulations; including but not limited to those related to modern slavery, child labor, human trafficking, bribery, discrimination, harassment, and pay equity. We strive to conduct our business in a way that demonstrates respect for globally recognized human rights and the dignity of all people, consequently Boston Scientific expects the same of our suppliers and business partners across the globe.

Boston Scientific, in accordance with local labor laws, does not tolerate suppliers or business partners who are found to be in violation of labor laws. For information on our Human Rights policy, please refer to our Boston Scientific Human Rights policy.

### Human trafficking and slavery

- Boston Scientific prohibits all forms of child labor as prohibited by the United States Department of Labor, Fair Labor Standards Act (FLSA) and ILO conventions C138 and C182 (child labor). Boston Scientific supports the right of children to have access to education, healthcare, and protection from criminal behavior. Suppliers and subcontractors must comply with all applicable laws and regulations of the country in which they operate.
- Boston Scientific is committed to the UK Modern Slavery Act Statement to ensure modern slavery, as such term is defined in the Act, is not taking place in our business and supply chain. Generally, modern slavery is defined as offenses of slavery, servitude, and forced or compulsory labor and human trafficking. Boston Scientific's UK Modern Slavery Act Statement can be found at [Corporate Responsibility | Labor & Human Rights - Boston Scientific](#) and searching for Modern Slavery Act.
- Boston Scientific adheres to the California Transparency in Supply Chains Act.

### Non-discrimination and respect for employees

- Boston Scientific expects its suppliers to comply with fair employment practices that provide equal opportunities to all employees in compliance with international and local regulations. Suppliers shall not discriminate or allow harassment on the basis of race, color, religion, disability, gender, national origin, sexual orientation, age, or any other legally protected status in the countries we operate.
- Suppliers should not allow unacceptable treatment of employees such as mental cruelty, sexual harassment, or discrimination that may be sexual, coercive, threatening, or abusive.

## Working hours, wages and benefits for employees

- Suppliers are expected to provide employees with regulated working hours, rest periods, and time off in accordance with International Labour Organization (ILO) standards. All forms of forced labor or exploitative working conditions are prohibited as per the U.S. Department of Labor, Fair Labor Standards ACT (FLSA) and ILO conventions 29 and 105.
- Suppliers shall pay fair wages for labor and adhere to all applicable legal requirements.

## Health & safety of employees

- Suppliers should act in accordance with applicable statutory and international standards regarding occupational health & safety and provide safe and healthy working conditions.
- Suppliers must have a reasonable occupational health & safety (OH&S) management system. Including framework to increase safety, reduce workplace risks and enhance health and well-being at work.

## Environment protection

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- Boston Scientific expects suppliers to adhere to practices that protect the natural environment and that conserve natural resources and when possible, repair damage and reverse negative trends by instituting approaches based on compliance and risk assessments. Suppliers should act in accordance with applicable statutory and international standards including environmental protection programs aimed at reducing the risks to the environment from contaminants such as hazardous materials and wastes.
- Suppliers must establish a reasonable environmental management system including but not limited to:
  - Institute a program to address pollution prevention measures and regulatory compliance by providing procedures for safely working with these materials, materials toxicity and chemicals, recyclability, and end of life products, inspecting storage practices and designating preventative maintenance procedures.
  - Regulate manufacturing, processing, distribution and use of chemicals and other pollutants.
  - Promote energy efficient, environmental stewardship, sustainable growth, air, and water use and water treatment, air pollution prevention, biodiversity, and deforestation.
  - Compliance with any local, state, or national environmental regulations.
  - Include environmental emergency plans, to provide appropriate actions to improve and to correct adverse outcomes to the environment

To ask questions or to report a concern about Boston Scientific's adherence to human rights laws and labor standards, individuals may use Boston Scientific's Advice Line. The Boston Scientific Advice Line handles calls 24/7 in multiple languages and may be accessed toll-free at 888-968-8425.

## Energy and emissions

- Boston Scientific encourages and may request validation of supplier to take the following measures and action to address emissions across the value chain and enhance energy efficiency.
  - Assess and when required publicly disclose scope 1 and 2 emissions, and if available, scope 3 emissions in line with greenhouse gas (GHG) Protocol.
  - Encourage to commit to setting a science-based target aligned with the 1.5-degree Celsius pathway such as the Science Based Target Initiative (SBTi) and reporting progress annually.

## Product life-cycle and design for sustainability

- Boston Scientific encourages suppliers to support initiatives to design and deliver products that are environmentally sustainable. This includes, but is not limited to, reducing the environmental footprint of products across their life-cycle, from sourcing and manufacturing to distribution, use, and end-of-life disposal.
- Supplier may be asked to provide a Life Cycle Assessment (LCA) for the component or finished good that is being sent to Boston Scientific if available. The LCA may include the carbon footprint of the product. If a full LCA is not available, the supplier may also provide materials composition, emissions impact factors along with the product materials or respective weights.

## Ethical business practices

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### Anti-Corruption and Bribery

- Suppliers shall not tolerate any form of corruption or bribery, directly or indirectly. They should not engage in any activity that is, or could appear to be, a conflict between suppliers' interests and those of Boston Scientific.
- Suppliers should not offer or promise anything of value to a government official, employees in the private sector, or a Boston Scientific employee, to influence business decisions or obtain improper advantage.
- Suppliers shall comply with all applicable international and local anti-bribery and corruption laws.

### Fair competition, anti-trust laws and intellectual property

- Suppliers shall conduct their business(es) in accordance with national and international competition laws and shall not participate in market or customer allocation, price fixing, or bid rigging with competitors.
- Suppliers must respect intellectual property rights, and observe and respect all patents, copyrights, design rights, trademarks, and trade secrets, including those of Boston Scientific.
- Suppliers shall not provide Boston Scientific any confidential information of third parties unless consent has been obtained from the appropriate parties.

### Conflict minerals

- The term “conflict minerals” is defined to include tin, tantalum, tungsten, and gold (the derivatives of cassiterite, columbite-tantalite, and wolframite) regardless of their country of origin; the U.S. Secretary of State may designate additional minerals in the future.
- Suppliers are required to comply with the “conflict minerals” disclosure requirements as per the Securities and Exchange Commission (SEC) adopted rules for implementing disclosure requirements related to “Conflict Minerals”, as directed by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. To ask questions or to report a concern about Boston Scientific’s Conflict Minerals Policy or Program, please contact us toll-free at 888-968-8425.

### Data integrity

- Suppliers must not falsify records, misrepresent data, or engage in any activity that compromises the integrity, accuracy, or authenticity of documentation or information provided to Boston Scientific.

### Economic inclusion

- Boston Scientific is committed to including qualified small and socio-economically disadvantaged businesses in its sourcing processes and supply chain. It encourages all suppliers to support this commitment by deploying strategies and programs to increase sourcing opportunities for qualified small and socio-economically disadvantaged businesses, where applicable.

### Sustainability in the supply chain

- Suppliers shall utilize commercially reasonable efforts to implement the principles of this Code with its suppliers and if possible, implement the principles of this code as a total supply chain initiative.

### Compliance with Supplier Code of Conduct for suppliers

Supplier fully understands and commits to comply with this code of conduct. It is the Supplier's responsibility to monitor compliance with all applicable laws and regulations, mitigate risks and promote continuous improvement measures.

Supplier Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Authorized Representative Name: \_\_\_\_\_

Signature & Date: \_\_\_\_\_

\*\* Please provide name in local language as well as English version (where applicable)

## Exhibit 1 - Corporate Responsibility Standards and Guidance

1. United Nations Global Compact <https://www.unglobalcompact.org/>
2. United Nations Principles on Business and Human Rights  
[UN Guiding Principles - Business and Human Rights Centre](#)
3. United Nations Universal Declaration of Human Rights  
<https://www.un.org/en/about-us/universal-declaration-of-human-rights>
4. International Labour Organization – Declaration of Fundamental Principles and Rights at Work  
[Fundamental Principles and Rights at Work | International Labour Organization](#)
5. ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy  
<https://www.ilo.org/empent/areas/mne-declaration/lang--en/index.htm>
6. ILO International Labour Standards on Occupational Safety and Health  
[International Labour Standards - Occupational Safety and Health - ILO Research Guides at International Labour Organization](#)
7. Women’s Empowerment Principles  
<https://www.unglobalcompact.org/take-action/action/womens-principles>
8. Children’s Rights and Business Principles [Children’s Rights and Business Principles | UNICEF](#)
9. United Nations Convention against Corruption  
<https://www.unodc.org/unodc/en/treaties/CAC/>
10. The California Transparency in Supply Chains Act <https://oag.ca.gov/SB657>
11. The UK Transparency in Supply Chains Act  
[Transparency in supply chains: a practical guide \(accessible\) - GOV.UK](#)
12. ISO 14000 Environmental Management (as applicable)  
<https://www.iso.org/iso-14001-environmental-management.html>
13. ISO 26000 Social Responsibility (as applicable)  
<https://www.iso.org/iso-26000-social-responsibility.html>
14. ISO 45001 Occupational Health and Safety (as applicable)  
<https://www.iso.org/iso-45001-occupational-health-and-safety.html>
15. SA 8000 Social Accountability International (as applicable)  
<https://sa-intl.org/programs/sa8000/>
16. Boston Scientific Supplier Guidebook [Supplier Guidebook 2021 Digital](#)

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