

**TECEX** MEDICAL

# Supplier Code of Conduct

## Supplier Code of Conduct

TecEx, Group Limited and all its further subdivisions ("TecEx") chooses suppliers based on how well they meet their standards for quality, price, delivery, service, diversity, reputation, ethics, environmental practices, business practices, and long-term benefits to TecEx and its customers.

This Supplier Code of Conduct (the "Code") confirms that suppliers are committed to upholding the highest standards and promoting a culture of openness, trust, and integrity. The goal of this Code is to ensure that suppliers have measures in place to protect their employees, consultants, customers, partners, and TecEx from any illegal or harmful actions by anyone working for or with TecEx.

All supplier staff are required to adhere to the terms and conditions of this Code. Any questions about this Code should be directed to TecEx.

Suppliers must ensure that all their staff are responsible for following and upholding all aspects of this Code, and complying with their company's governing documents (e.g., policies, standard operating procedures). All supplier staff are also responsible for raising questions if they are unsure whether this Code and any of their related company governing documents are being upheld.

If a supplier identifies a violation of this Code, they must notify TecEx as soon as possible. Suppliers agree not to retaliate against any supplier colleague who makes a complaint in good faith. Any act of retaliation is considered a violation of this Code.

If it is determined that a supplier has not complied with the Code, TecEx may suspend its engagement with the supplier. Further actions, including termination of the engagement, may be taken. Conduct that violates the Code may also violate applicable laws as well as other supplier, TecEx, or customer policies, and may subject TecEx, the supplier, and supplier staff to prosecution and/or legal action.

## Ethics

Suppliers must comply with all applicable laws, rules, and regulations when working with TecEx's and its customers, regulatory agencies, and in the legal jurisdictions where TecEx conducts business. This includes laws and regulations related to:

- Labor and employment
- Health and safety
- Environmental protection
- Anti-corruption and anti-bribery
- Anti-money laundering
- Competition and anti-trust
- Intellectual property
- Data protection and privacy
- Consumer protection

Suppliers must also comply with TecEx's own policies and procedures, and shall adhere to the following standards of ethical conduct:

- Suppliers must conduct their business in an ethical manner and act with integrity.
- TecEx will not use any supplier who does not maintain the high level of ethical standards as outlined in this Code.
- Corruption, extortion, and embezzlement are prohibited. Suppliers must not pay or accept bribes or participate in other illegal inducements in business or government relationships.
- Suppliers must conduct their business in a fair and competitive manner, in compliance with all applicable anti-trust laws. They must also employ fair business practices, including accurate and truthful advertising.
- Suppliers must not use child labour and must not use any subcontractor who uses child labour. TecEx will not engage any supplier that uses child labor.
- TecEx will not engage any supplier where there is evidence that a TecEx employee has been subjected to harassment or discrimination by that supplier's staff
- Suppliers must maintain the confidentiality and proprietary information of TecEx and its customers.

## Human and Labour Rights

Suppliers must uphold the human rights of all supplier staff and foster a working environment that values diversity, inclusion, and mutual respect. Every individual shall be treated with dignity and afforded equal rights and opportunities based on merit and ability, free from discrimination and harassment.

All supplier staff have a right to equal treatment with respect to employment, free from harassment and without discrimination based on race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, religion, sex, sexual orientation, age, record of offences, marital status, same sex partnership status, family status, disability, military status, and any other ground listed in applicable laws of the province, state or country where the supplier conducts business.

All supplier staff has a right to freedom from any action that creates a hostile or offensive work environment.

Supplier staff are responsible for ensuring a work environment that is free from discrimination and harassment by:

- Conducting themselves in a professional manner and treating others with mutual respect and dignity.
- Refusing to participate in or tolerate any discrimination or harassment.
- Reporting any suspected incidents of discrimination or harassment to supplier management.

Suppliers should have processes in place to ensure that any supplier staff who believes they have been subjected to discrimination or harassment may report the conduct through a protocol that provides for immediate notification to the alleged offender that the behaviour is unwelcome. Where the affected individual is uncomfortable with directly confronting the alleged offender, or where such notification fails to resolve or correct the issue, the matter shall be escalated to supplier management.

Suppliers must have processes for, and supplier staff are to be familiar with, governing documents addressing the following subject matter:

- Discrimination and Harassment – Prevention and Reporting
- Workplace Violence and Harassment – Prevention and Reporting

Suppliers shall pay supplier staff according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

Suppliers shall communicate with supplier staff regarding the basis on which they are being compensated in a timely manner.

Suppliers are also expected to communicate with supplier staff whether overtime is required and the wages to be paid for such overtime.

## **Health and Safety**

Suppliers must provide a safe and healthy work environment in compliance with applicable provincial, state, and/or federal laws and regulations.

Supplier staff must follow safe and healthy work practices.

Any safety hazard, unsafe practices, or accidents must be reported immediately to supplier management, Health and Safety Committee members, or to Supplier Human Resources.

It is the responsibility of all supplier staff to take the necessary precautions to protect themselves and those around them, and to take action to correct unsafe practices or conditions.

It is a violation of this Code for any supplier staff to be under the influence of alcohol, drugs, illegal substance or to be impaired from any other substance while working. It is also a violation to use, possess, distribute, buy or sell any illegal substances while at the workplace or while working on supplier's behalf outside of the workplace.

Supplier staff must not participate or engage in any violent or threatening acts whether physical or verbal while at the workplace or while acting on the supplier's behalf outside of the workplace.

Suppliers must have a process for, and supplier staff are to be aware of, a governing document for Health and Safety and, if applicable, a Health and Safety Policy Statement. Suppliers must have processes in place so that each supplier staff will promptly report to supplier management or their Health and Safety Committee representative, any situation or business practice that poses a safety or health concern.

## Environmental Protection

Suppliers must operate in a manner that is environmentally responsible and efficient and must minimize engagement in practices that may adversely impact the environment.

Suppliers are encouraged to work diligently to support and actively participate in environmental initiatives across their entire company, from the sourcing of services, office operational management, to business travel, and to delivering services to TecEx and TecEx's customers.

Suppliers must have processes in place so that each supplier staff will promptly report to supplier management any situation or business practice that poses an environmental concern.

Suppliers are encouraged to support projects that generate energy from renewable resources. Each supplier staff strives to reduce energy use, water use, waste generation, and the use of other natural resources.

Suppliers must support waste reduction and recycling efforts and must do their best to reduce the environmental impact of operations and mitigate environmental risks.

Suppliers are encouraged to formally commit to Science Based targets to reduce greenhouse gas emissions. Suppliers and supplier staff must comply with all Environment, Health and Safety (EHS) regulations and supplier internal EHS standards.

## Privacy and Security

Suppliers must enter and be bound by non-disclosure agreements (NDAs) and data processing agreements (DPAs) with TecEx. These agreements include protections for confidentiality, intellectual property, data security, and data subject privacy.

Suppliers must safeguard and make only proper use of confidential information to ensure that supplier staff, and data subject privacy rights are protected.

Suppliers must enter NDAs and DPAs with their own suppliers and/or sub-processors to ensure that TecEx's entire supply chain is adequately protected.

TecEx requires suppliers to explicitly acknowledge and adhere to the principles embodied in the TecEx Supplier Code of Conduct, and to ensure that their own suppliers will also comply with these principles.

## Training

Suppliers must have a training program that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address the expectations outlined in this Supplier Code of Conduct.

## Continual Improvement

Suppliers are expected to continually improve their performance by setting measurable objectives, developing and executing implementation plans regularly assessing their own performance against this Code, and taking prompt corrective action to address any deficiencies identified through internal or external assessments, inspections, or management reviews. Such corrective action may include revising governing documents, providing additional training, or investing in new resources.

## Audit

Suppliers agree that TecEx has the right to perform annual due diligence checks. The purpose of the checks is to validate compliance with the requirements of the Supplier Code of Conduct, Quality, and Security requirements, including governing documents and applicable laws.

Suppliers agree to respond to all audit findings in writing within thirty (30) calendar days of receipt of the audit report. They also agree to respond to any subsequent follow-up discussions as deemed necessary by TecEx.

Except with respect to audit findings that are the subject of a bona fide dispute, the supplier will promptly comply with the requirements of the Supplier Code of Conduct at its own expense.

Suppliers may be required to participate in an external review of their compliance with this Supplier Code of Conduct, based on the requirements of TecEx and its customers. Such review may be conducted by a third-party organization, such as a certification body or an independent auditor, either in person or through an online platform.

The purpose of the external review is to verify that suppliers are meeting the expectations of TecEx and its customers. The review will typically assess the supplier's governing documents, as well as their implementation and monitoring activities. By participating in an external review, suppliers can help to demonstrate their commitment to ethical and sustainable business practices.

## Additional Resources

Ecovadis: <https://ecovadis.com/>

UN Sustainable Development Goals: <https://www.un.org/sustainabledevelopment/>

General Data Protection Regulation (GDPR): <https://gdpr-info.eu/>

The Foreign Corrupt Practices Act (FCPA): <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>

**Acceptance**

The supplier will ensure that their staff and third parties providing services to TecEx Group Limited, and all its further subdivisions will be given a copy of the TecEx Supplier Code of Conduct, as amended from time to time, to read, understand, and agree to follow upon commencement of such work and a renewed annually.

**Supplier:**

Signature:

Print Name/Title:

Date: