

LABOUR STANDARDS POLICY AND SUPPLIER CODE OF CONDUCT

Beaver-Visitec International Sales Limited, including its parent(s), subsidiaries, divisions and affiliates collectively hereinafter referred to as “BVI”, is a global, world-class single-use surgical device company across all ophthalmic specialties.

This policy and code of conduct is distributed to our BVI employees as well as suppliers and other providers of goods and services to BVI. As a responsible employer and manufacturer of medical devices, we need to ensure that every employee and supplier understands BVI’s commitment to adhere to International Labour Standards. This will be achieved through continuous improvement and maintenance of the Modern Slavery Assessment Tool (MSAT) and annual measurable KPIs that are available upon request.

BVI Values

- **Integrity**
- **Collective Intelligence**
- **Accountability**
- **Agility**

Introduction

In accordance with our Vision and Values set forth above, BVI believes in acting ethically and responsibly with respect to its procurement activities. As a result, BVI has developed a global labour standards policy and supplier code of conduct (“Supplier Code”) which sets forth our global expectations for BVI and its suppliers. Suppliers, contractors, consultants, agents and other providers of goods and services who do business with BVI are expected to follow BVI’s Supplier Code. Furthermore, all suppliers receiving this document confirm that the principles here-in will be passed down through their own supply chains.

Business Conduct Principles

BVI and its suppliers are required to conduct business responsibly, with integrity, honesty and transparency, and to adhere to the following principles:

- 1. Maintain awareness and comply with all applicable laws and regulations of the countries of their operation.**

2. Compete fairly for business, without paying bribes, or receiving or giving anything of value to secure an improper advantage.

BVI is committed to conducting business legally and ethically. Suppliers will comply with international anti-bribery standards as stated in the United Nations Global Compact and local anti-corruption and bribery laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010 and any amendments thereto. Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

As part of this commitment, BVI forbids its employees and/or its agents from giving or accepting money and/or gifts in exchange for favorable treatment in its business practices

3. Provide a workplace free from discrimination, harassment or any other form of abuse.

BVI and its suppliers will provide a workplace free from discrimination, harassment or abuse. Suppliers will not discriminate on the basis of race, age, religion, disability, age, sexual orientation or gender. Suppliers must not subject workers to any form of harassment, including any unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment. Employment decisions must be based on qualifications, skills, performance, and experience.

4. Treat employees fairly, including but not limited to wages and working conditions.

BVI and its suppliers will comply with all applicable legal and regulatory requirements and must generally apply robust employee relations practices. Working hours, wages, benefits will all be consistent with laws and industry standards, including those pertaining to minimum wages, equal pay, overtime, other elements of compensation, and legally mandated benefits.

5. Prohibit all forms of forced or compulsory labour.

BVI and its suppliers shall maintain and promote fundamental human rights. Employment decisions will be based on free choice and there will be no coerced or forced labour, or bonded, indenture or prison labour, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.

BVI follows in accordance to the Modern Slavery Act 2015, please see our Modern Slavery Statement [here](#).

6. Prohibit use of child labour.

BVI and its suppliers will adhere to the minimum employment age limit defined by national law or regulation and comply with relevant International Labour Organisation (ILO) standards. In no instance shall a supplier permit children to perform work.

BVI follows in accordance to the Modern Slavery Act 2015, please see our Modern Slavery Statement [here](#).

7. Respect employees' right to freedom of association and collective bargaining, consistent with local laws.

Consistent with applicable law, BVI and its suppliers shall respect employees' rights to join or refrain from joining associations and worker organisations.

8. Provide safe and healthy working conditions.

BVI and its suppliers will proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, suppliers shall provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency first aid kits and access to emergency response including environmental, fire and medical.

9. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

BVI and its suppliers will comply with all applicable environmental laws, regulations and standards. The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to promote cleaner air and water and to reduce landfill waste.

10. Maintain accurate financial business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Provide true records of country relevant payments.

11. Deliver products and services meeting applicable quality and safety standards.

BVI and its Suppliers understand and comply with the relevant product quality and safety standards, policies, specifications. It shall follow and adhere to good manufacturing practices, training and testing protocols and be compliant with all applicable federal, state, and local safety laws and regulations.

12. Compliance with Supplier Code of Conduct.

BVI expects suppliers to develop and maintain all necessary documentation to support compliance with this policy. Any breach of the obligations stipulated above is a material breach of contract by the Supplier and may lead to removal from the approved supplier list.

13. Framework for addressing Concerns

We have a framework for addressing concerns, please click [here](#). Any claims reported are treated with the strictest of confidence as we utilise the services of an external provider.

14. TUPE: (Transfers undertaking of protection of Employment) Regs 1981

As an acquisitive business we follow the relevant legislation which could include TUPE.

15. We abide by the GDPR Regulations 2018.

Diana Richardson
Lead HR BP Global Operations
Labour Standards Management Representative

Acknowledgement and Acceptance:

This is to certify that on behalf of the company set forth below we hereby acknowledge that we have fully read, understand and agree to comply with the terms set forth in BVI's Supplier Code of Conduct.

Print Supplier Name and Address:

.....
.....
.....

Print Name:

Title:

Signature:

Date: