

Supplier Code of Conduct

September 2022

Fisher & Paykel
HEALTHCARE

10

EVEN



aisle entry notice

PEDESTRIANS & FORKHOISTS
NOT PERMITTED IN AISLE WAYS
AT THE SAME TIME

Fisher & Paykel
HEALTHCARE

109

ODD

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HEALTHCARE

109

EVEN

SAFE WORKING UNIT LOADS

Unit Load	Max. Height
500kg	1000mm
1000kg	1000mm
1500kg	1000mm
2000kg	1000mm

OPERATION AND MAINTENANCE OF PALLET RACKS

THE INSTALLATION COMPLIES WITH
AS/NZS 1155:2001

Fisher & Paykel
HEALTHCARE

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ODD



Introducing the Supplier Code of Conduct

Fisher & Paykel Healthcare ('F&P') is a leading designer, manufacturer and marketer of products and systems for use in acute and chronic respiratory care, surgery, and the treatment of obstructive sleep apnea. Our medical devices and technologies help clinicians deliver the best possible patient care. They enable patients to transition into less-acute care settings, recover more quickly and avoid more serious conditions.

At F&P, our firm belief in doing the right thing and creating a lasting positive impact goes beyond our commitment to patients – it also applies to our supply chain. This is all anchored in our view that social responsibility and sustainability are inextricably linked to the way we do business.

This Supplier Code of Conduct ("Code") is based on the standards and principles outlined in the UN Global Compact Ten Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

This Code reflects our values and our expectations for the conduct of all suppliers, contractors and consultants, and their affiliates, who provide goods or services to F&P. We find business relationships are more productive and effective when they are built on trust, mutual respect, and common values. As such, F&P seeks relationships with suppliers who share a common commitment to:

- Comply with all laws and regulations.
- Act ethically and with integrity.
- Respect human and employee rights.
- Incorporate quality business processes within day-to-day operations.
- Promote and maintain a health and safety culture.
- Design for sustainability.
- Monitor and minimise any negative impacts on the environment.
- Have systems in place to ensure business continuity, continuous improvement and protection of intellectual property.

We are focused on building trusted long-term relationships with suppliers across the globe to maximise opportunities for companies and communities to thrive, all while promoting safe working environments and sustainable outcomes.

Legal Compliance

Suppliers must comply with all applicable local and international laws and regulations at a minimum, in all locations they operate their business.

Ethics

Trust and ethical behaviour are a key foundation of our business relationships and underpin our belief in doing the right thing. This means that suppliers must comply with all laws and behave ethically, with integrity and transparency in all business transactions.

Anti-bribery and corruption

F&P does not tolerate bribery, corruption, kickbacks, or other types of improper benefits, whether committed by our own people or anyone we deal with. For suppliers this includes:

- Not offering or accepting bribes or other improper payments, with the aim of obtaining undue or improper advantages.
- Not offering to any F&P employee gifts or personal benefits which could be perceived as a bribe.
- Having suitable policies, processes, or procedures in place to prevent such behaviour within their business.
- Maintaining confidential processes that encourage employees and contractors to report incidents of unethical behaviour without (fear of) retaliation.
- Not using subcontractors or third parties to evade legal or ethical requirements.

Confidential information and intellectual property

Suppliers must secure and protect any confidential information, property (whether physical or intellectual) or personal data (“Information”) shared with them, including by:

- Using Information only for the agreed purposes for which it is provided to them.
- Implementing appropriate physical, technical and administrative safeguards to ensure that Information is kept secure and not shared with or disclosed to third parties except as otherwise agreed by F&P.
- Protecting confidential information and respecting intellectual property rights.
- Reporting to F&P any suspected unauthorised disclosure of information or infringement of intellectual property rights.



People

We fully support the principles in the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We believe our people are our strength and seek to uphold human rights in all business activities. Each year we publish a Modern Slavery Statement detailing steps taken to uphold human rights in our supply chain. We all have a part to play, and we encourage our suppliers' participation in both industry and F&P-led efforts aimed at upholding human rights within the supply chain.

Freely chosen employment

All human beings have the right to decide whether or not to engage in work. Any actions taken to impede on this right are considered a violation of a person's right to freely choose their employment. All work must be voluntary, and workers should be free to leave work or terminate their employment after a reasonable notice period. We require our suppliers to safeguard these principles by:

- Not using modern slavery practices in their operations or supply chain. Modern slavery includes human trafficking, forced labour, slavery, servitude, debt bondage, child labour, forced marriage or deceptively recruiting workers for labour or services.
- Respecting the freedom of movement of their workers and not restricting their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment.
- Ensuring workers are not required to pay recruitment fees or other fees for their employment, either directly or through third parties.
- Ensuring, as part of the hiring process, that workers get a written agreement describing the terms of employment in a language understood by them. Where workers are internationally relocating, the written agreement must be provided before they leave their origin country.
- Considering groups that are more vulnerable and have adequate measures in place to ensure the rights of these groups are upheld, such as migrant workers.
- Actively supporting the eradication of modern slavery by taking measures to identify and mitigate modern slavery risks along their supply chain.
- Passing the requirements of this Code onto any third-party recruitment agencies.

Protection of children and young workers

F&P recognises the rights of children and does not tolerate any forms of child labour. F&P is committed to protecting children from economic exploitation and requires our suppliers to do the same. This includes by:

- Complying with the minimum legal working age in the country in question or in the absence of such law, a minimum of 15 years, as per the International Labour Organisation (ILO) Convention 138.
- Having specific procedures in place for employees under the age of 18 (young workers) to protect them from hazardous work and night work.
- Having safeguards in place that specifies any employment of workers under the age of 18 does not interfere with schooling or vocational education, or expose children to risks that can harm physical, mental, or emotional development.

Wages, benefits and working hours

We strive to provide a high quality of life for our people and support our suppliers to do the same for theirs. Sustainable working hours and adequate remuneration are a key element of this. This includes by:

- Complying at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent.
- Providing workers with written and understandable information about their employment conditions before they enter employment, and about their wages for each pay period.
- Paying wages and benefits on time and at least equal to the applicable legal minimum wage and any associated statutory benefits.
- Not deducting from wages as a disciplinary measure.
- Ensuring that work schedules and rest periods are consistent with applicable local legal requirements. Work hours and schedules should not be excessive and negatively impact employees' health or safety.
- Ensuring overtime is voluntary and paid in accordance with local and national laws and regulations.

Freedom of association and collective bargaining

Freedom of association and collective bargaining are an integral part of a free and open society. The rights of workers to freedom of association and collective bargaining must be respected by our suppliers. This includes by:

- Ensuring workers are free to choose how they are represented, such as forming and joining trade unions and employers' associations, and collectively bargain on their behalf...
- Not discriminating against workers and representatives because of their membership or affiliation.
- Enabling access for worker representatives to carry out their respective function in the workplace.

Fair treatment, non-discrimination, diversity, and inclusion

We value the differences people bring. We believe this creates a diversity of thinking that forms the foundations of our culture. We are committed to providing an inclusive workplace free from discrimination, harassment and bullying and expect our suppliers to do the same. This includes by:

- Providing an inclusive workplace free of any direct or indirect discrimination, including gender, age, ability, sexual orientation, gender identity, marital or family status, ethnicity, religious beliefs, or cultural background.
- Committing to a workplace free from bullying, harassment, victimisation, abuse, and unlawful discrimination of any kind.
- Ensuring that workers are not subjected to corporal punishment, physical abuse or discipline, verbal or mental abuse, sexual abuse, or any type of exploitation.
- Ensuring that no individual is excluded from a position, for which they are skilled and qualified, by inappropriate systems, practices, and attitudes.
- Having policies, processes, and procedures in place, along with training of employees to ensure a safe and inclusive workplace.
- Promoting awareness around the importance of a diverse and inclusive workforce.

Responsible mineral sourcing

We are committed to the responsible sourcing of minerals, ensuring that our procurement is undertaken in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain, preserves the environment and mitigates other risks. To support these objectives, we expect our suppliers that are sourcing minerals to:

- Not knowingly directly source 'conflict minerals' from mines, smelters, or refiners.
- Source minerals from audited and Responsible Minerals Assurance Process (RMAP) (or equivalent) approved smelters.
- Annually identify smelters within their supply chain submitting a Conflict Mineral Reporting Template (CMRT) (as issued by the Responsible Minerals Initiative).
- Where 'smelters of interest' defined by the Responsible Minerals Initiative (RMI) are identified, take practical steps to mitigate risks and remove from their supply chains, within a reasonable and defined timeframe. On request, share information regarding steps and timeframes for these actions.



Quality

As a medical device manufacturer, meeting high quality standards is essential. Suppliers are a critical element in successfully delivering quality products through their supply of product, parts, and services. At a minimum, we expect suppliers will:

- Have a documented quality management system in place that is aligned to ISO 9001 (Quality Management Systems) or equivalent quality standard, to ensure consistent performance in delivering conforming products, parts, or services.
- Ensure all identified non conformances are documented and appropriately addressed in agreed timeframes, and corrective actions put in place.
- Support continuous improvement and development initiatives focussed on achieving high quality levels.

Our Supplier Quality Manual delivers a detailed overview of the expectations and requirements.

Refer to the Supplier Quality Manual for more detail, available at this link: <https://www.fphcare.com/supplier-qualitymanual>.

Material Compliance

F&P sells product to customers globally and must comply with many global regulations. Legislation like the European Union's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and the Restriction of Hazardous Substances Directive (RoHS) require manufacturers and suppliers to provide information about restricted substances that needs to be passed on through the supply chain. We strive to eliminate all use of Substances of Very High Concern (SVHC) if possible or otherwise communicate the presence of SVHC in our supply chains.

To enable this, we require suppliers of materials to:

- Provide F&P periodically with updated material content declarations as requested.
- Where feasible, work with F&P towards substituting or removing materials and SVHC from products.

Health and Safety

Our intent is to ensure all of our people and those who may be affected by our operations are healthy, well and return home from work safely every day. We extend this goal to suppliers.

Workplace and environment

F&P strives to provide a safe and healthy work environment within our operations and require suppliers to do the same, including by:

- Providing and maintaining workplaces, machinery, and equipment, and use work methods, which are as safe and without risk to health as is reasonably practicable.
- Ensuring workers have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Where provided, living quarters must meet internationally recognised standards for hygiene, health, and safety.
- Protecting employees from unhealthy exposure to chemical, physical, biological, and physiological hazards in the workplace.
- Providing personal protective equipment (PPE) and machinery safeguards at no cost to the worker, with workers trained in their use.

Training and education

Effective training can play a vital part in reducing the risk of a workplace accident and we expect our suppliers to educate their employees and contractors, including by:

- Providing workers with adequate and regular training to perform their jobs in a safe manner.
- Training shall take into account the functions and capacities of different categories of workers.
- Actively promoting employee rehabilitation and processes for a safe and timely return to work.

Emergency preparedness

F&P is committed to the effective management of emergency situations and critical incidents. Being prepared to respond to such occurrences can help reduce the risk of harm and save lives. We expect suppliers to do the same including by:

- Providing measures to deal with emergencies and accidents, including adequate first aid arrangements.
- Implementing programs to minimise and manage the safety risk and prevent catastrophic events.

Reporting and representation

Reporting assists with raising awareness and the prevention of incidents. At F&P, we have a culture of continuous improvement, and this includes health and safety. We expect our suppliers to do the same, including by:

- Having a system to record, monitor and manage health and safety risks and incidents, that is aligned to the organisation's risk profile as well as applicable laws and standards.
- Enabling workers to have representation and actively encourage the raising of health and safety concerns and reporting incidents.
- Have appropriate methods in place to continually evaluate and improve health and safety performance.



Environment

F&P is committed to creating a positive lasting impact on the environment. We look to innovate to enable a more sustainable future. The activities within our supply chain materially impact our ability to achieve this goal and we aim to work with suppliers that operate in an environmentally responsible and sustainable manner.

Climate change

Climate change is a growing concern among F&P suppliers, customers, investors, and our own people. To reflect our commitment towards creating a positive lasting impact, F&P has set science-based carbon reduction targets approved by the Science Based Targets Initiative. We are dedicated to implementing sustainable business practices and maintaining an ongoing carbon emission measurement and reporting scheme. We require F&P suppliers to support these targets by:

- Measuring, managing, and sharing information on their greenhouse gas emissions and reduction plans.
- Suppliers are encouraged to set carbon reduction targets in line with the 2015 Paris Agreement supported by the Science Based Targets Initiative.

Natural resources

We recognise we have a responsibility to care for the natural environment while we pursue our business goals, and we expect suppliers to do the same, including by:

- Measuring, managing, and minimising the consumption of energy, water, and natural resources.
- Continually monitoring the impact of their operations on water consumption and working to minimise through avoidance and/or reuse.
- Identifying all waste from their operations and ensuring systems and processes are in place to manage the handling and disposal of waste safely and appropriately, in accordance with local regulations and international conventions.
- Minimising the generation of waste through avoidance, reuse and/or recycling procedures.
- Preventing the accidental release of hazardous substances into the environment.

Sustainability by design

We embed sustainability into what we do through our Ecodesign structure, including looking at sustainable packaging, biobased and circular materials, and environmental life-cycle assessments. We believe that by investing in these initiatives, we can be more innovative and successful in the long term. We require suppliers to contribute by:

- Supporting the F&P Ecodesign program with reasonable assistance as we seek to reduce the environmental impacts of our products and services.
- Integrating environmental considerations into products and/or provision of services.

Governance and Management Systems

As a medical device company, continuity of supply of products to patients is vital. Suppliers must manage their activities systematically in order to maintain operational continuity and constant improvement in their operations, including by:

- Demonstrating senior management commitment and accountability through the setting of clear objectives and the establishment of documented procedures and policies.
- Implementing mechanisms to regularly identify, evaluate, and manage risks including business continuity plans, health and safety, social and environmental risks.
- Ensuring appropriately qualified personnel are tasked with implementing the standards detailed in this Code.

Monitoring, Compliance & Reporting

Performance to this Code

We expect our suppliers to respect and comply with this Code, and encourage suppliers to carry out pro-active measures to ensure that their own suppliers, partners, and distributors also comply with this Code. F&P may request suppliers to provide evidence of compliance with this Code. This may be in the form of self-assessment surveys, presenting policies or procedures, on-site visits or formal audits.

We recognise that the diversity of our supplier base can present different challenges. It is our preference to work with suppliers to understand their unique challenges and develop an approach that supports meeting this Code. Some steps we may take include:

- Undertaking or requesting a review of the supplier's compliance to the Code.
- Asking for more details about an occurrence or challenge and any subsequent corrective actions.
- Working with the supplier to create a recommended plan for improvement.
- Considering the supplier's performance against our Supplier Code of Conduct as an influencing factor when making future procurement decisions and, in certain instances, terminating arrangements between us and the supplier.

Contact us

We encourage suppliers to be transparent about any challenges they face so we can work together to find practical solutions. If you have any concerns about meeting the standards set out in this Code, please contact your F&P Procurement representative directly.

We support all employees, contractors, and suppliers to Speak Up on any issue including activity by the business that conflicts with our Code of Conduct, values, policies, or laws in the countries in which we operate. Our Supplier Speak Up service is a mechanism by which concerns can be raised. For more information and to report a breach of the Code, please email FPHspeakup@deloitte.com.au.

