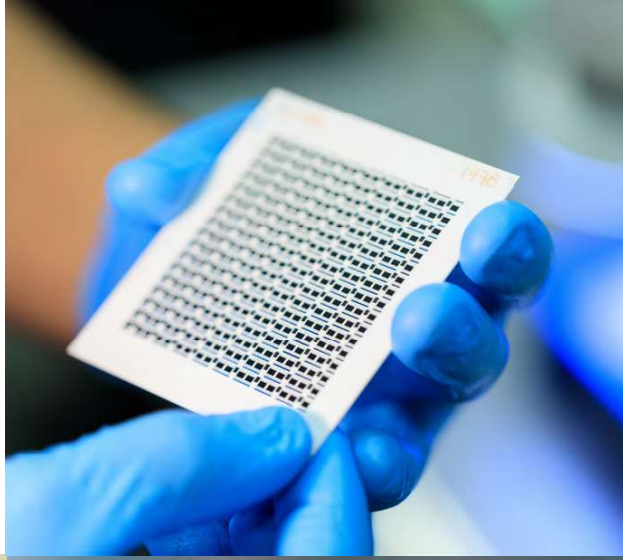
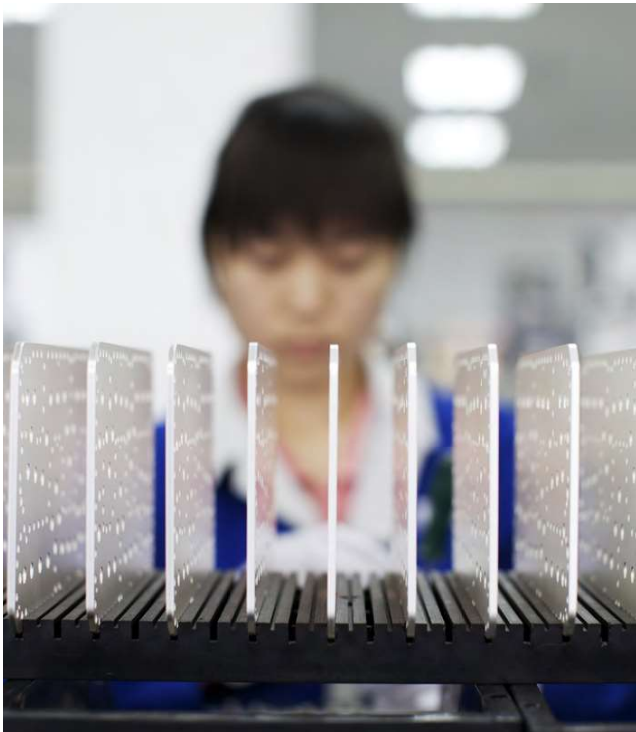


smiths



SUPPLIER  
CODE 2022  
SMITHS GROUP PLC



# SUPPLIER CODE OF ETHICS

For more than 170 years, Smiths has been a pioneer of progress. This pioneering spirit continues to drive us today, underpinned by our powerful culture. Our values are important to us. We live them every day in each action and decision we take. They are Integrity, Respect, Ownership, Customer Focus and Passion, and they drive everything we do.

**Our stakeholders trust us to do business in the right way: safely, sustainably, lawfully and to the highest business and ethical standards.** We have selected you as a business partner because we, in turn, trust you to help us uphold these expectations, not only by supplying us with high quality materials, products or services, but by operating to the highest business and ethical standards in all that you do.

Whether you are supplying us with components, materials, products or services; distributing our products; or helping us to develop our markets, our Supplier Code applies to you. We expect all our business partners to be familiar with and committed to the principles set out in it.

Your partnership and commitment to doing business the right way is vital to our success and we are grateful for your support and contribution. If you have any questions about this Supplier Code or the standards set out in it, please ask your Smiths contact or a member of the Smiths' Ethics & Compliance team at **[Speakout@smiths.com](mailto:Speakout@smiths.com)**.

Thank you,

**Roland Carter**  
CEO



## KEEPING PEOPLE SAFE

**Health and safety** is our top priority. Wherever we operate, we aim to provide injury-free workplaces for both our people and anyone visiting our facilities. We do this by implementing Group-wide health and safety standards, and activities to improve our safety culture, behaviours

and risk reduction. We expect and require our Suppliers to maintain a healthy and safe workplace environment for their employees, customers and visitors, and to implement and maintain effective management systems to understand, manage and reduce health and safety risks.



## RESPECTING EACH OTHER AS A CORE SMITHS VALUE

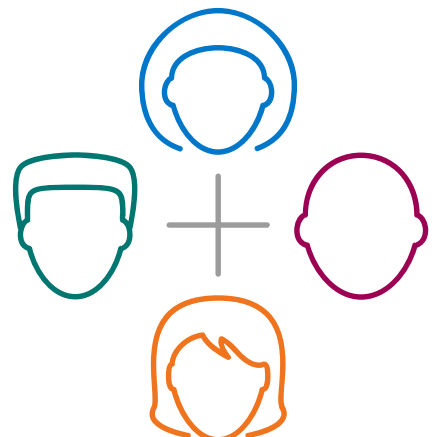
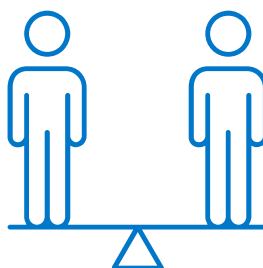
**Fair Employment Practices and Human Rights.** Smiths is committed to respecting internationally recognized human rights standards in the countries where we operate. As stated in our Human Rights Policy, available [here](#), we focus on respecting human rights in our workplaces and promoting these principles in our supply chain. Our Suppliers must respect the human rights of their employees and others in their business operations and activities for Smiths. Our Suppliers must also comply with all applicable labour laws and regulations, uphold all internationally recognised human rights and labour standards (including those set out in the UN Guiding Principles) wherever their operations are located. We require our Suppliers to comply with our Human Rights policy and to ensure that others in their supply chain do the same.

**Humane Treatment in the workplace.** It is essential that all Suppliers treat their workers with dignity and respect, in a workplace that is always free of any form of harsh or inhumane treatment, including mental or physical coercion, bullying, harassment (including sexual harassment), intimidation, retaliation and verbal abuse.

**Diversity.** Our strength and success comes from the diversity of thought, approach, experience, and perspective that we each bring. This diversity reflects the different backgrounds and cultures that we come from. We expect our Suppliers to recruit, select, and promote their employees solely on their qualifications, skills, aptitude and attitude. In employment-related decisions, our Suppliers must comply with applicable anti-discrimination laws.

Smiths requires its Suppliers not to engage in or support, any discriminatory or biased practices in recruitment, remuneration, access to training, promotion, termination or retirement.

**Elimination of Forced/ Involuntary Labour.** Suppliers are required to help us eliminate any form of forced or involuntary labour in our supply chains. Consistent with our Human Rights policy, Suppliers must never engage in or abet the unlawful trafficking of people or use any form of slavery or forced, bonded, indentured, or involuntary prison labour, or subject workers to any form of physical, sexual or psychological compulsion, exploitation or coercion.





## Elimination of Child Labour.

Our Suppliers should never use persons below the age of 16 on Smiths related work. If the Supplier, or the law of any country in which a person is to be employed, has established an age limit above the age of 16 then that limit will apply. Smiths expects Suppliers to take reasonable steps to verify a worker's age before that person starts work. When persons under the age of 18 are employed, they must not do work that is mentally, physically, socially or morally dangerous or harmful or that interferes with their schooling.

**Right to a living wage.** Smiths requires Suppliers to pay their staff at least the minimum wage required by applicable laws and to provide legally mandated benefits. Wages shall be paid in accordance with that person's terms of employment. Wages shall never be deducted as a disciplinary measure.

**Right to reasonable working hours and vacation.** Smiths Suppliers must comply with applicable laws on working hours, overtime and holiday entitlements and to observe all periods of rest mandated by applicable law.

**Freedom of Association.** Smiths respects its employees' rights to freedom of association. We require our Suppliers to comply with applicable laws governing the rights of workers to freely associate, to form trade unions or other labour organisations, and or to collectively petition their employer about terms of employment and working conditions.

## Collective Bargaining.

We require our Suppliers to engage in good faith negotiations with any authorized and legally recognized trade union, labour organisation or other representative of staff as to terms of employment and other working conditions. Further, we expect Suppliers to not engage in or support any unfair labour practice or other conduct intended to intimidate or coerce any employee from engaging in legally protected activities in connection with any collective bargaining or collective labour action.

**Managing the risk of workplace violence.** Our Suppliers must operate a clear and effective policy on workplace violence prevention.

**Privacy.** We require our Suppliers to respect and protect any personal information that they may receive as part of our business relationship. Our Suppliers must comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared. Additionally, where our Suppliers rely on technology to deliver their services to us, we also expect them to deploy appropriate cyber security controls and maintain an effective cyber security programme to identify, manage and resolve any cyberattacks which would impact their delivery of services to us.

We expect and require our Suppliers not to use staff below the age of 16



## DOING BUSINESS THE RIGHT WAY

### Complying with the law

is a minimum but essential requirement in our Code of Business Ethics. Our Suppliers are required, as a minimum standard, to comply with all applicable laws, legal regulations and directives, and all obligations in any contract they may have with us. This includes all applicable laws related to anti-corruption, anti-competition, trade, health safety and environment, and human rights and labour standards, as well as any other laws regulating our business transactions. Our Suppliers must also ensure their employees, contractors, agents, suppliers and other parties working on their behalf act in accordance with applicable laws, the standards set out in this Supplier Code and their contractual obligations to Smiths. We expect and require our Suppliers to conduct appropriate due diligence on their own suppliers by screening for bribery and corruption, trade compliance, and human rights risks; and including appropriate terms and conditions in their supply contracts to ensure these requirements are cascaded throughout their own supply chain.

### Bribery and corruption

is never acceptable and will never be tolerated at Smiths. Our Suppliers are expected and required to behave ethically in all business dealings, to comply with bribery and corruption laws, and to have adequate systems and controls in place to prevent bribery and corruption. Supplier staff must never offer, promise, give, demand or accept (nor tolerate others paying or accepting) bribes to obtain, retain or give business or other advantage. Smiths prohibits its employees from making **facilitation payments**, and we expect our Suppliers to do the same in relation to their Smiths-related business activities. **Gifts, meals or hospitality** must never be given to improperly influence others' business decisions, or if they could give that appearance. We prefer that our Suppliers do not give our employees' gifts. We operate a strict gifts, meals and hospitality policy that may require our employees to decline gifts and invitations. Our employees are not allowed to request gifts, meals or hospitality from anyone and our Suppliers should never feel obliged to offer gifts, meals or

hospitality to Smiths staff (and if our staff request gifts, meals or hospitality, please report this through the Speak Out system referenced below).

**Conflicts of Interest** arise when personal interests interfere with an employee making an objective business decision for its employer (Smiths or our Supplier). Conflicts of interest, or the appearance of a conflict of interest, could undermine our reputation and our Suppliers', and therefore must be carefully managed. Our Suppliers must promptly disclose to Smiths any potential conflicts that may arise in our partnership and we will do the same.

**Antitrust avoidance and fair competition** are at the heart of a thriving economy. Smiths is committed to ensuring that it honors all relevant antitrust competition laws. We require our Suppliers to do the same, and not to engage in any behaviour that violates antitrust laws. For example, our Suppliers must not collude with competitors to fix prices, rig bids, allocate customers or markets, or exchange current, recent or future commercially sensitive information.

Gifts, meals or hospitality must never be given to improperly influence others' business decisions, or if they could give that appearance.





International trade laws must always be complied with. ■■

**International trade laws** must always be complied with. We expect our Suppliers to comply with applicable export and import obligations, anti-boycott regulations, economic sanctions and other applicable trade laws, regulations, policies, and procedures, wherever they operate. For example, when products, services, technology, software and/or technical data are sold, transferred, or shared by, to or with Smiths and/or our Supplier.

**Paying taxes** (for example, corporate taxes, sales taxes, import and export duties and tariffs). Smiths is committed to paying its taxes and has zero-tolerance for tax evasion and the facilitation of tax evasion, including intentionally and dishonestly engaging in or helping a third party (whether a customer, supplier, service provider, contractor, agent, government or public body, adviser, or anyone else) engage in tax evasion anywhere in the world. Our Suppliers must honor that same commitment.

**Lobbying.** Engaging with government agencies, appointing lobbyists, and giving political donations are subject to strict laws. We require that these activities by our Suppliers are conducted legally, transparently, in good faith, and take account of ethical and reputational risks.

**Keeping accurate records.** Smiths expects and requires its Suppliers to maintain up-to-date, accurate and complete books and records related to their business activities with Smiths.

# MINIMISING OUR ENVIRONMENTAL IMPACT. SOURCING RESPONSIBLY

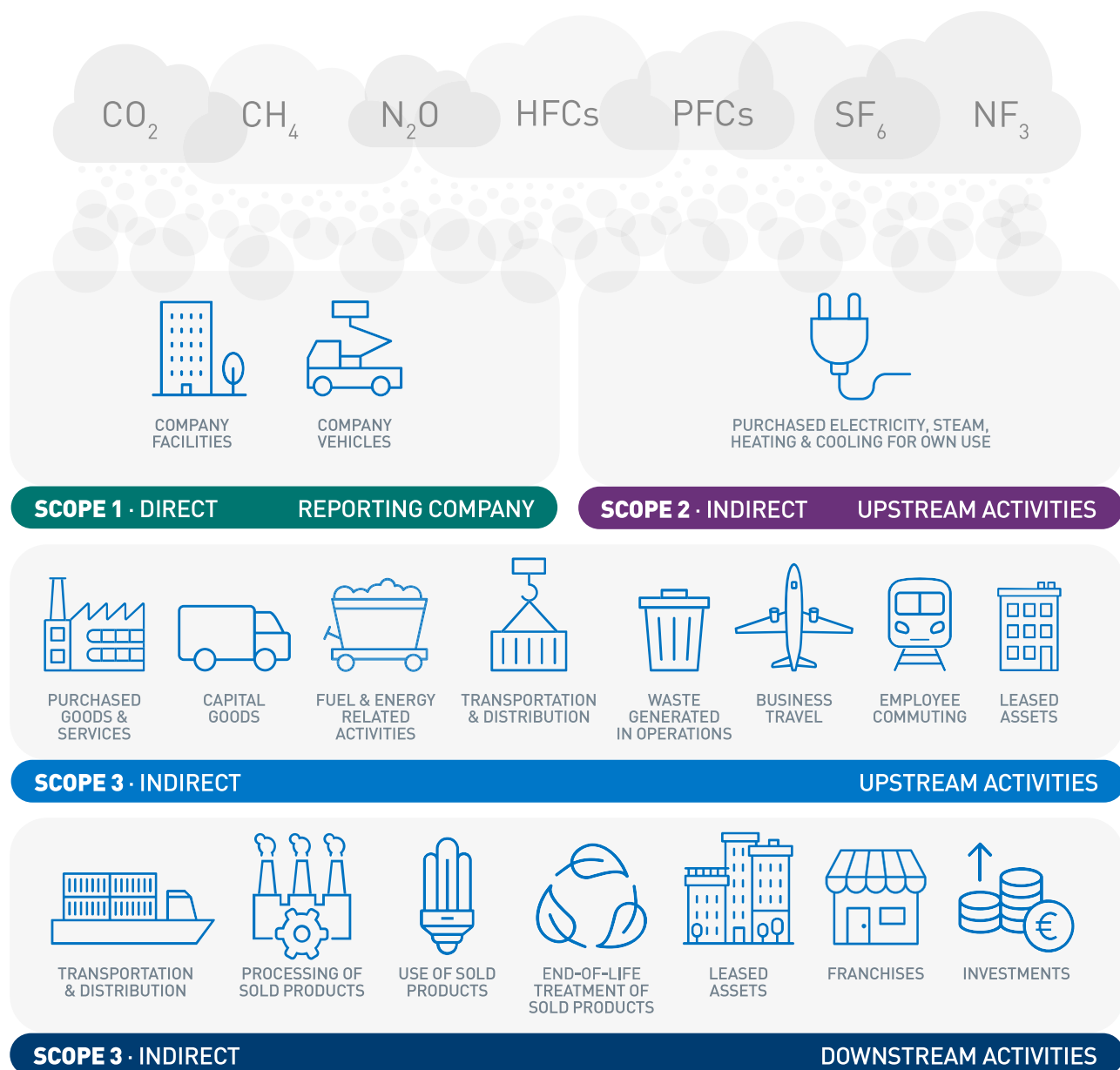
## Care for the Environment.

Our environmental standards are vital to our operations and form an important part of our strategy to promote a culture of responsibility. We are committed to conducting our business in an environmentally responsible way, including using energy and natural resources efficiently and reducing our greenhouse gas emissions. Our environmental

goals may be found [here](#).

Our aim is to minimise any adverse effects our activities, products and services may have on the environment. We are committed to being net zero (carbon emissions) by 2040 from our operations, and for Scope 3 (see diagram below) emissions by 2050. We support the Task Force on Climate-related Financial Disclosures.

We are also committed to science-based carbon-emissions based targets and the UN Race to Zero. We expect Suppliers to share our commitment to the environment, and at a minimum comply with relevant environmental laws and regulations.





**Responsible sourcing of minerals.** We seek to ensure that our sourcing practices safeguard human rights. Our Suppliers must do the same by implementing and maintaining robust systems and processes to ensure that minerals are not unlawfully sourced from areas of conflict. Where our Suppliers supply Smiths with products, components and materials that contain Tin, Tungsten, Tantalum, Gold and Cobalt, we expect them to have conducted thorough due diligence on the source of those minerals to ensure that they have been sourced under the applicable law and internationally recognized standards. Suppliers should follow the guidance published by the Organization for Economic

Co-operation and Development (OECD) on Due Diligence to ensure Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("CAHRAs").

**Sustainable Products.** Smiths is committed to responsible product stewardship and providing our customers with sustainable products and services. In turn, we expect our Suppliers to work to provide sustainable products and services, considering life cycle assessments, reducing hazardous materials, raw materials and packaging wherever safe and practical.

For Smiths' product Suppliers, we require compliance with **IEC 62474 – Material**

**Declaration for Product of and for the Electrotechnical Industry.** Suppliers must promptly provide Smiths with all necessary records evidencing compliance of the materials and/or goods to IEC 62474. Additionally, Suppliers must provide material declarations upon request.

Smiths is required to demonstrate that its products and its use of certain materials satisfy laws (including environmental laws) and international standards. Suppliers are expected to promptly provide information (including material declarations) reasonably requested by Smiths to enable us to demonstrate compliance with those laws and standards.

## COMMITMENT TO QUALITY

Our Suppliers must partner with us to meet the customer quality expectations and ensure value and timeliness

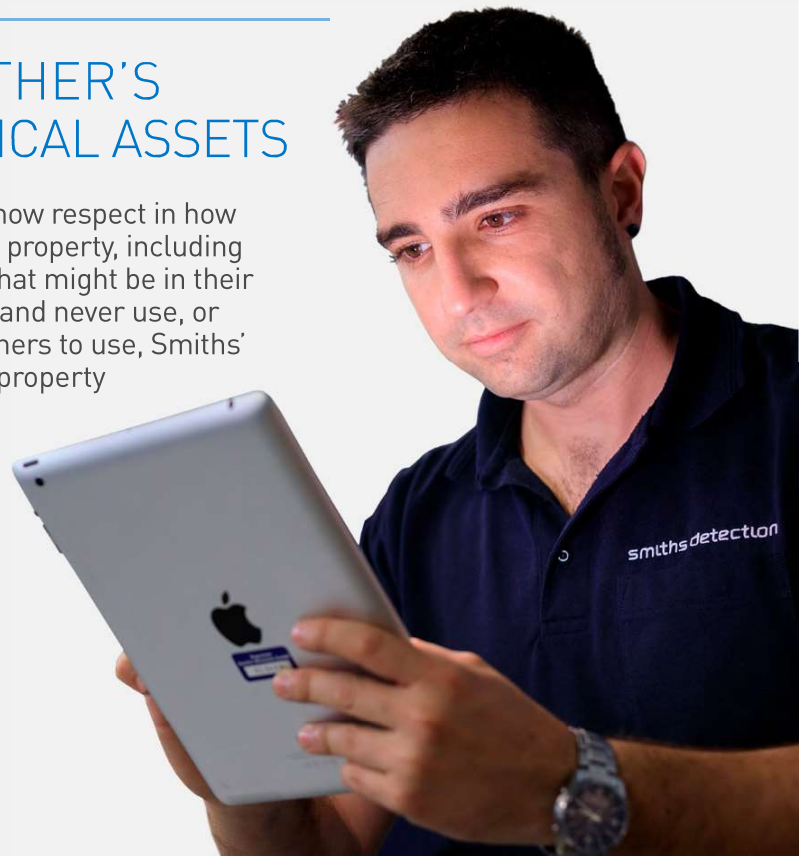
throughout the supply chain. Our Suppliers are expected to ensure that work product meets applicable quality

standards and establish quality assurance processes to identify defects and implement corrective actions.

## LOOKING AFTER EACH OTHER'S INTELLECTUAL AND PHYSICAL ASSETS

In our Code of Business Ethics we commit to protecting information, intellectual property and any other assets belonging to our Suppliers and other third parties. We expect and require that our Suppliers never disclose any non-public information (including personal data regarding Smiths employees) to any third party except as authorised by Smiths; only share confidential information with those who need to know it to perform

their jobs; show respect in how they use our property, including equipment that might be in their possession; and never use, or authorize others to use, Smiths' intellectual property without a prior written agreement to do so.





## BUSINESS CONTINUITY

We expect our Suppliers to have effective business continuity and crisis management plans in place, including pandemic and infectious disease planning. Such plans should

be regularly reviewed and tested. Additionally, where our Suppliers rely on technology to deliver their services to us, we also expect them to deploy appropriate cyber security controls to reduce their

vulnerability to such threats and maintain an effective programme to identify, manage and resolve any cyberattacks which would impact their delivery of services to us.

## OTHER IMPORTANT DOCUMENTS



**SMITHS CODE OF BUSINESS ETHICS**



**SMITHS LABOUR STANDARDS AND HUMAN RIGHTS POLICY**



**SMITHS SPEAK OUT POLICY**

## REPORTING CONCERNS

We require Suppliers to have a process that enables its employees, contractors, subcontractors, agents or other stakeholders to report acts or behavior that they consider to be unethical, unlawful or that breach this Supplier Code. We also require our Suppliers to take active steps to encourage reporting. Anyone making such a report must not face any adverse treatment as a result. Suppliers must investigate any report thoroughly, and promptly take appropriate remedial action if the report is substantiated.

While our Suppliers are required to self-monitor and have corrective action processes for timely correction of deficiencies, we expect our Suppliers to provide Smiths with any information it reasonably requests to demonstrate compliance with this Supplier Code.

If a Supplier becomes aware of any acts or behaviour by a Smiths employee, contractor, subcontractor, agent or other stakeholder that they consider to be unethical, unlawful or to breach this Supplier Code, we ask that you report it to

your Smiths contact, or if you prefer, to Smiths' Speak Out reporting hotline (via email: [SpeakOut@smiths.com](mailto:SpeakOut@smiths.com)). All reports to the Smiths Speak Out hotline will be treated confidentially (unless they are required to be disclosed by law) and will be investigated promptly and thoroughly. If you prefer (and subject to relevant laws) you may report anonymously. Smiths' Speak Out policy, which applies to Smiths employees and stakeholders, can be accessed [here](#) (or by request via email at [SpeakOut@Smiths.com](mailto:SpeakOut@Smiths.com)).

# REPORT UNETHICAL BUSINESS BEHAVIOUR

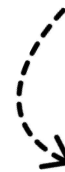
At Smiths, we take our values and reputation seriously. If any Smiths employee, one of our businesses, or a business partner has done anything to breach this Supplier Code or our Code of Business Ethics – including any act of bribery, corruption, or other integrity concern – you have a responsibility to report it to the Smiths Speak Out Hotline.

## Smiths Speak Out Hotline

is an email and web-based reporting service that submits your report directly to the Smiths Ethics & Compliance team. They review all concerns and conduct investigations as needed.

ETHICS &  
COMPLIANCE

## Speak Out Hotline



Web

[speakout.smiths.com](https://speakout.smiths.com)



Email

[speakout@smiths.com](mailto:speakout@smiths.com)



# SUPPLIER DECLARATION

I, the undersigned, hereby declare that I have read and understand Smiths Supplier Code as provided with this declaration document and my company will honor the Code in the way it conducts its business.

Signature:

Printed Name:

Title:

Company Legal Name:

Date: