

SMITHS MEDICAL

LABOR STANDARDS PROTOCOL

Smiths Medical, a division of Smiths Group plc (“Smiths”), considers forced labor, human trafficking and other forms of modern slavery to be outrageous crimes and categorically contrary to acceptable norms of human interaction. Such conduct, as well as any other practices that exploit workers or deny them the rights and benefits to which they are legally entitled, is wholly inconsistent with Smiths and Smiths Medical’s values and policies, and will not be tolerated. Smiths Medical (or the “Company”) is committed to operating to the highest ethical standards. This includes, among other things, ensuring that its operations and suppliers are free from any practices associated with forced labor, human trafficking and modern slavery, and also any other conduct that denies workers their rights or is otherwise inconsistent with Smiths Policies on, Supplier Code of Conduct and Human Rights Policy (collectively referred to in this document as “Labor Standard Policy”), and this protocol.

As a division of Smiths, Smiths Medical follows the Labor Standards Policy, acknowledges its obligations towards its employees, stakeholders and the communities in which it works, and has outlined below its protocol in relation to labor standards and the Labor Standards Policy.

Scope: This protocol applies to, and is intended for the protection of, all persons working for Smiths Medical or on Smiths Medical’s behalf, including, employees, agency workers, seconded workers, volunteers, interns, freelancers and consultants working on Smiths Medical’s behalf, and also those of contractors, sub-contractors and third-party representatives, including, but not limited to, recruiting agents and providers of temporary or casual labor (“Staffing Agencies”), as well as other parties engaged directly with or in support of Smiths Medical’s business (such persons are defined herein as “Staff”).

This protocol also applies to, and is intended to promote the protection of, employees, agency workers, seconded workers, volunteers, interns, freelancers and consultants and other workers engaged by direct and indirect suppliers to Smiths Medical of components, materials, resources and services, (collectively, “Suppliers,” and such persons employed by or working for Suppliers are defined herein as “Third Party Workers”).

1. **MINIMUM LABOR STANDARDS**

A. Child Labor.

No Child Labor – Smiths Medical does not and will not engage in or support the use of child labor. Neither Smiths Medical nor its Staffing Agencies will employ any person or engage anyone directly or indirectly who is below the legal age limit set by law in any of the countries in which Smiths Medical, Staffing Agency or the Supplier operates, as applicable. If the local law sets no age limit, then no one below the age of 16 shall be employed. If a Smiths Medical business has established an age limit above the age of 16 then that limit will continue to apply. Smiths Medical will also (and will take such reasonable actions intended to require that Staffing Agencies also will) (a) comply with any applicable law that limits the number of hours, acceptable working hazards, or times of day work is scheduled as to any Staff who is not an adult, and (b) take reasonable steps to satisfy itself of the Staff member’s age before that person starts work at Smiths Medical.

B. Forced or Compulsory Labor.

No Forced Labor – Smiths Medical will not engage in or support the use of forced or compulsory labor, or bonded or involuntary prison labor. All Staff members are free to leave, without penalty, after providing reasonable notice as specified in their individual contracts of employment, applicable employee manuals, and/or as permitted under local law. Under no circumstances will Staff who are migrant workers be

threatened with denunciation to the authorities to coerce them into taking up or maintaining employment at Smiths Medical. Further, wage deductions of any kind will not be used to keep Staff tied to Smiths Medical. No member of Smiths Medical's Staff shall be made to work as a disciplinary measure, or for failure to meet production quotas. The foregoing does not preclude Medical Staff implementing mandatory overtime requirements, where permitted by and as otherwise in compliance with, applicable national and local law, including the payment of both basic and additional compensation for such overtime as required by law.

Freedom of Association and Movement – Freedom of movement and association is respected and the movement of Staff shall not be unreasonably restricted. Staff shall not be physically restricted or confined to the workspace or to housing or other accommodations provided by Smiths Medical or by any of its Staffing Agencies, nor shall any coercive measures be used to restrict any member of Staff freedom of movement. For the avoidance of doubt, any restriction on movement applied for reasons of safety (for example, in circumstances where an employee is working in a war zone or disaster area) is not a violation of this protocol.

Custody of Personal Documents – Smiths Medical strictly prohibits the confiscation or withholding of passports or other personal identity or travel documents belonging to Staff. Under no circumstances will the retention of personal identity documents be used to force a member of Staff to continue working directly or indirectly for Smiths Medical. It is only permissible for Smiths Medical, or for a Staffing Agency, as applicable, to take custody of a Staff member's identity documents if it is at the Staff member's request (for example, for the purposes of safe keeping), provided always that those documents will be returned immediately to that member of Staff upon their request.

C. Terms of Employment and Compensation.

Smiths Medical will comply with all applicable national and local laws governing compensation, hours of service, working conditions and other employment matters. Where Smiths Medical policies and procedures provide a greater level of protection or benefit Smiths Medical will adhere to those policies and procedures.

Terms of Employment – Staff shall be given clear and transparent written terms and conditions of employment, which include wages, any legally permissible deductions, working hours, time off, disciplinary policies and other working conditions. The key terms and conditions of employment shall always be agreed before that member of Staff starts work at Smiths Medical. The terms and conditions must be communicated in a language that the Staff members understand.

Recruitment Fees and Deposits – Staff shall, under no circumstances, be charged any fee or other costs in relation to their recruitment to work at Smiths Medical, whether directly or indirectly. Recruitment fees shall be paid by Smiths Medical. Also, Staff shall not be required at any time to lodge deposits or security payments with Smiths Medical or with any Smiths Medical Staffing Agency. Smiths Medical shall add appropriate restrictions to its contracts with Staffing Agencies (at the time of review or renewal thereof) and take other actions as needed to prevent violations of this protocol.

Working Hours – Smiths Medical shall comply with applicable laws on working hours and holiday entitlements. Except where applicable laws require or permit otherwise, the Company would expect normal working hours not to exceed 48 hours per week, and overtime hours not to exceed 12 hours per week. Likewise, Smiths Medical will observe all periods of rest mandated by applicable law, or the policies of Smiths Medical. Smiths Medical ensures that all employees have the legal right to be employed globally (as appropriate).

Wages – All members of Staff will be paid at least the minimum wage required by applicable laws, and shall receive legally mandated benefits. Wages will be paid at regular intervals in accordance with that person's terms of employment. Wages shall be paid without deductions directly to the Staff Member or to his/her bank account, as requested by the Staff member, with a preference for payment to the Staff

member's bank. The foregoing does not apply to deductions required by law, for example, deductions for income or payroll taxes, or to deductions for employee-elected benefits or deductions agreed in the employment contract that are not of an unusual nature or unreasonable – for example, reasonable deductions for housing, meals or other expenses incurred with the Staff member's consent, such as educational or training expenses. Wages shall not otherwise be delayed, deferred or withheld, except to the extent permitted by applicable law. Neither Smiths nor any Staffing Agency will seek control of Staff's earnings or their bank accounts. Wage deductions must not be used as a disciplinary measure.

Advances – Occasionally, and in limited circumstances, Smiths Medical at its absolute discretion, and pursuant to Company policy, may make an advance (i.e. relocation, education, contingent bonus) to employees, with repayment arrangements to be mutually agreed upon. Under no circumstances shall staff be forced to work to pay off a debt owed to Smiths Medical or to any Staffing Agency.

Disciplinary Practices – Smiths Medical and any Staffing Agency working on behalf of Smiths Medical (in circumstances where Staff are employed by the Staffing Agency) shall treat all employees and members of staff with dignity and respect. Smiths Medical shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, intimidation or verbal abuse of personnel. Neither Smiths Medical, nor any Staffing Agency acting on behalf of Smiths Medical, shall apply sanctions that result in compulsory labor. The use or threat of physical violence, harassment and intimidation against a Staff member or his or her family or close associate, is strictly prohibited and Smiths Medical shall ensure that no disciplinary procedure is undertaken except as permitted by applicable terms of employment.

D. Freedom of Association and Collective Bargaining.

Freedom of Association – Smiths Medical respects Staff rights to freedom of association and shall comply with applicable laws governing the rights of workers to freely associate, to form trade unions or other labor organizations, and/or to collectively petition Smiths Medical with regard to terms of employment and working conditions. Smiths Medical will not discipline or retaliate against any Staff member seeking to exercise his or her rights to freedom of association including membership in any trade union or labor organization or participation in any other legally protected activities. Smiths Medical will not engage in or support the creation or use of any company union or seek to control, directly or indirectly, any trade union or labor organization which Staff members seek to create or join. Smiths Medical shall not require that Staff join any particular trade union or labor organization except to the extent that such membership is mandated either by applicable law or by collectively bargained labor agreement with such union or labor organization.

Collective Bargaining – Smiths Medical will engage in good faith negotiations with any authorized and legally recognized trade union, labor organization or other representative of Staff as to the terms of employment and other working conditions, and will take such action as reasonably needed to help assure that Staffing Agencies similarly engage in good faith negotiations. Smiths Medical will not engage in or support any unfair labor practice or other conduct intended to intimidate or coerce any Staff member from engaging in legally protected activities in connection with any collective bargaining or collective labor action.

E. Health and Safety.

Workplace Hazards – Smiths Medical shall provide a safe and healthy workplace environment for Staff and shall take effective steps to prevent potential accidents and injuries to Staff members' health and wellbeing by minimizing, so far as is reasonably practicable, and in cooperation with all Staff, the causes of hazards inherent in the workplace. All Staff will receive safety and job specific health and safety instructions during the course of their employment with Smiths Medical.

Sanitation – Employees shall have access to clean sanitary facilities and drinking water. Mandatory residence in employer or recruiter operated residences shall not be a condition of employment. Any housing that is provided to Staff shall be safe and shall meet reasonable accommodation standards, which shall

include insuring the number of occupants provides for reasonable privacy and is reasonably safe and sanitary. Such accommodation shall meet all local health, safety and planning laws, and other laws and Smiths Health and Safety policies that apply to residences operated by employers or their agents from time to time.

F. Discrimination.

Smiths Medical shall not engage in or support, and shall take such steps as reasonably needed to prevent Staffing Agencies from engaging in, any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on gender (including gender reassignment), marital status, family status, religious belief, disability, age, racial grounds (race, color, nationality or ethnic origin, including membership of the traveler community), genetic information, veteran status, pregnancy, sexual orientation or any other characteristics protected by applicable law. Staff will be treated fairly and equally. Country nationals will not be treated more favorably than migrant workers (including, in relation to compensation, benefits and accommodation). Smiths Medical has in place an Equal Opportunities Policy and a Workplace Harassment or Other Offensive Conduct Policy both of which are provided to all new employees at induction.

2. IMPLEMENTATION

A. Internal Operations.

Implementation of the Labor Standards Policy and this protocol in Smiths Medical's internal operations is the responsibility of Smiths Medical's Vice President, Human Resources, with support from the Vice President, Global Operations. Specifically, members of the Human Resources support team, as determined by the Vice President, Human Resources, shall be responsible for developing procedures needed for implementation of the Labor Standards Policy and this protocol (or identifying existing procedures relevant and available for such implementation), for communicating the Labor Standards Policy and this protocol and such implementing procedures globally across all Smiths Medical sites, and for arranging for appropriate training for both local Human Resources personnel as well sourcing personnel and local operations managers. Smiths Medical's Vice President, Global Operations, shall make available the managers responsible for site operations, sourcing and supply chain management, and health, safety and environment to assist Human Resources in the implementation of the Labor Standards Policy and this protocol and the adoption and use of implementing procedures at local sites (including local variations in such procedures as appropriate).

B. Suppliers.

Smiths Medical will undertake all reasonable actions needed to cause its Suppliers to comply with the standards set forth in the Labor Standards Policy and this protocol, including: (i) regular inquiry of and/or certification by each Supplier of its policies on each of the standards described in the Labor Standards Policy and section 1 above and the availability of processes for reporting grievances; and (ii) communication and acknowledgement by Suppliers of the Labor Standards Policy, this protocol and Smiths Medical's Global Sourcing Principles (attached hereto as Exhibit A).

Smiths Medical shall add appropriate restrictions and requirements to its contracts with Suppliers and Staffing Agencies (at the time of review or renewal thereof) to help assure compliance with such standards.

Based on such risk assessments as Smiths Medical deems appropriate, Smiths Medical shall undertake, or arrange with third parties to perform, reviews of the records and facilities of selected Suppliers for the purposes of ascertaining, to the extent possible under the circumstances, the following:

- The existence of policies and procedures committing the Supplier to labor standards compliance.

- The availability to Third Party Workers of written terms and conditions of employment.
- The ages of Third Party Workers.
- The general working conditions of Third Party Workers, particularly as to potential health and safety hazards and sanitation in both workplaces and Supplier operated housing.

The results of such reviews shall be reported to Smiths Medical's Vice President, Global Strategic Sourcing, and Vice President, Human Resources.

If the Supplier lacks such records or refuses to cooperate with such reviews, or if such reviews conclude that the Supplier's policies and practices do not conform to the standards set forth above or that there is insufficient information to reach a favorable conclusion, Smiths Medical shall develop a plan of corrective action which may consist of one or more of the following:

- Communicating the identified deficiencies to the Supplier and securing the Supplier's written commitment to remedy such deficiencies within a stated time.
- Identification of alternate sources to replace such Supplier in Smiths Medical's supply chain and implementation of an appropriate transition plan.

Smiths Medical's Vice President, Global Strategic Sourcing, is primarily responsible for communicating the Labor Standards Policy and this protocol to Suppliers and for developing and implementing the procedures outlined above with regard to Suppliers with the support of Senior Director of Supplier Quality, Global Quality and Regulatory, and the Vice President, Global Operations.

C. Reporting of Breaches and Grievance Procedure.

Staff are expected to report any actual or potential breach of the Labor Standards Policy, the Smiths Code of Ethics, the Supplier Code of Ethics and/or this protocol whether that breach is by Smiths or by a third party. The report should be made either to the Staff member's line manager, to Human Resources or through the Ethics Alertline. Any report made to a manager or to Human Resources shall be directed to the Smiths Group Office of Ethics and Compliance for further investigation. Smiths Medical shall ensure that employees who submit a good faith report of a violation of the policies and protocols outlined above will not face reprisal or retaliation of any kind.

Any breach of the Labor Standards Policy and/or this protocol by a Smiths Medical employee or other Staff may be subject to disciplinary action.

Smiths Medical will pursue appropriate corrective action as described above in the event of any reported violation of the Labor Standards Policy, the Smiths Code of Ethics, the Supplier Code of Ethics and/or the standards set forth in this protocol by a Supplier, Staffing Agency or other third party with whom Smiths Medical is transacting business.

The Alertline can be accessed [here](#).

D. Monitoring Legal Requirements, Periodic Review and Further Commitments.

Smiths Medical will regularly monitor: (i) changes in legislation and workplace regulations in countries where it operates or from which it sources components, materials, and resources; and (ii) the risks of forced labor, child labor and other labor standards issues in countries where it operates or from which it sources components, materials, and resources. Smiths Medical will obtain legal advice as necessary to support its compliance with such laws and regulations and may consult the International Labour Organization ("ILO") legislative databases accessible at; [ILO Link](#) and the [Global Slavery Index Link](#) .

Smiths Medical will periodically review this protocol along with other supporting policies and procedures, taking into account the results of the monitoring activities described above, in order to continually improve labor standards within its workplaces and its supply chain.

Any updates to legislation, labor related risks and/or this protocol will be reported to the Management Representative or his/her designee. The Management Representative will ensure that any such updates are reported to the senior management team and communicated to employees who have labor standards responsibilities.

Smiths Medical shall commit sufficient resources for the implementation of the Labor Standards Policy and this protocol, as needed to ensure the adequacy, suitability and continuing effectiveness of the Labor Standards Policy and this protocol.

Smiths Medical will make this protocol publicly available (specifically via its website - www.smiths-medical.com) and will communicate it to Smiths Medical's employees, contractors, sub-contractors and suppliers.

E. Other Relevant Policies.

- Smiths Code of Ethics
- Smiths Supplier Code of Conduct
- Smiths Human Rights Policy
- Smiths Conflict Minerals Policy
- Equal Opportunities Policy
- Workplace Harassment or Other Offensive Conduct Policy
- Smiths Medical Global Sourcing Principles
- Smiths Medical's Health and Safety Policy
- Smiths Medical Labour Standards Compliance – Statement of Principles and Expectations (March 2016)

EXHIBIT A

SMITHS MEDICAL GLOBAL SOURCING PRINCIPLES

Revised April 2018

Smiths Medical is a leading supplier of specialty medical devices, consumables and equipment for global markets. Our products are focused on the medication delivery, vital care, and safety devices market segments.

Because our supply chain stretches from one side of the world to the other, Smiths Medical has worked to ensure that our suppliers' employees, producing our products, or providing services to us, are provided with good working conditions. This drive supports our core brand value of integrity – we do the right thing, every time.

In addition, we understand that when people are treated with respect, work in decent conditions and earn fair rates of pay, both they and their companies benefit from increased commitment and productivity. Ultimately, our customers benefit too, from better quality and better value products.

We achieve these objectives by developing agreed standards with our suppliers, supported by regular site visits and a policy of continual improvement. A corrective action plan is developed when standards are not met, or where there is no commitment to improve standards. Because our suppliers often have their own complex supply chains, we expect our suppliers to set expectations with and to monitor their suppliers who contribute to what ultimately becomes a Smiths Medical product.

We will not under any circumstances accept product from non-approved factories or goods supplied from sites that differ from approved and validated locations. We are determined to do everything we can to bring fair sourcing principles to all stages of our supply chain. We have therefore published our Global Sourcing Principles and Smiths Medical Labour Standards Protocol (the "Protocol") to set out our beliefs and standards to guide our suppliers.

These principles set out what is required and expected from our suppliers – i.e. those from whom we directly purchase goods or services, including staffing agencies – to ensure they meet acceptable standards, and are continually improving. Smiths Medical will pursue appropriate corrective action in the event of any reported violation of the Smiths Anti-Slavery and Human Trafficking Policy, the Smiths Code of Ethics, the Supplier Code of Ethics set forth in this document and the Smiths Medical Labor Standards Protocol by a Supplier or other third party with whom Smiths Medical is transacting business.

At Smiths Medical, we take great care selecting the suppliers who supply us directly with products and/or services. Our Global Sourcing Principles and the Protocol establish the standards for suppliers working with us.

As our business relationship develops, we expect suppliers to raise their standards and improve working conditions, taking account of all applicable legislation addressing labour standards assurance and modern slavery.

Supplier's responsibility

We have a clear set of standards appropriate to the industries and countries manufacturing our products. It is the supplier's responsibility to achieve and maintain these standards in their operations and to enforce these standards with their own supply chain.

Transparency

In today's increasingly transparent world there is a greater need than ever to make these standards and management systems part of our suppliers' everyday business and for them to be able to demonstrate they are doing so. Smiths Medical is committed to working with our suppliers in an open, constructive and transparent manner and we request our suppliers do the same.

Workforce and Human Rights

The people working for our suppliers are to be treated with respect, and their health, safety and basic human rights must be protected and promoted. Each supplier must strive to comply with all relevant local and national laws, including The Modern Slavery Act 2015, and regulations and its obligations in the Principles particularly with regard to:

- HR Management Systems and Processes
- Labour Standards and Human Rights
- No Discrimination and Equal Opportunities
- Decent Working Conditions
- Health and Safety
- Working Hours and Wages
- Avoidance of Modern Slavery and Forced Labour

Manufacturing Sites

Suppliers must agree with us in advance the manufacturing site or sites to be used: no subcontracting of our orders from these agreed locations is allowed.

Supplier Assessments

All supplier manufacturing sites are visited and assessed regularly by our supplier quality engineering team. We expect suppliers to participate in self-assessment exercises as reasonably requested by us and to cooperate with on-site audits. Together we strive for the highest level of quality and continual improvement.

Environmental responsibility

At minimum, suppliers must meet all relevant local and national regulations. In addition, we expect them to meet all the relevant Smiths Medical standards relating to the environment.

Extending these principles throughout the supply chain

We expect our suppliers to adopt and communicate similar principles in dealing with their own suppliers.

Our commitment to Customers

Smiths Medical acknowledges its responsibility to our Customers to ensure high quality, innovative medical devices and services, and a healthy supply chain that respects human rights safety and the environment.

Suppliers must apply these principles at all times, and must also be able to demonstrate that they are doing so. We will work with suppliers to support any necessary improvements and we will also take corrective action, which may involve cancelling orders or contracts, if suppliers are not prepared to make appropriate changes.