# TELEFLEX LABOUR STANDARDS ASSURANCE POLICY

## OVERVIEW

Teleflex is committed to ensuring compliance to recognized standards which have been established by organizations such as the International Labour Organization (ILO), the U.S. Department of Labor and the U.K. Modern Slavery Act 2015, among others. Teleflex shall commit to continuous improvement to achieve full compliance with the standards within its own facilities as well as its supply chain. Teleflex seeks to achieve and, where practicable, exceed applicable legal requirements and recognised international labour standards.

Details are spelled out in the following sections:

- LABOUR AND HUMAN RIGHTS
- HEALTH & SAFETY
- THE ENVIRONMENT
- ETHICS
- SUPPLIER DIVERSITY
- MANAGEMENT SYSTEMS

## SCOPE

This policy applies to all Teleflex facilities. Teleflex Procurement Department shall strive to ensure that its suppliers adhere to the minimum standards which are defined within this policy.

The Teleflex HR Department shall maintain Labour Standards Compliance within all Teleflex owned facilities. Regional differences in labour standards shall be addressed on a case-by-case basis; however, this policy is expected to cover the requirements for global compliance.

This policy is supported by our Code of Ethics policy and other policies referenced herein.

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## 1. POLICY

This policy and its accompanying procedures serve as Teleflex's Labour Standards Assurance framework and support compliance with the NHS Supply Chain Labour Standards Assurance System (LSAS). The policy establishes minimum requirements intended to ensure that working conditions across Teleflex facilities, and to the extent possible throughout its supply chain, are safe; that all workers are treated with respect and dignity; and that sourcing and manufacturing activities are conducted in an environmentally and socially responsible manner.

We are also guided by International Labour Organization Standards (ILO), the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) guidelines, the Ethical Trading Initiative (ETI), the U.K. Modern Slavery Act 2015 and the U.N. Global Compact.
This Policy is supported by internal Teleflex procedures namely:

1. Labour Standards Risk Assessment and Remediation Process (D0070541)
2. Labour Standards Assurance System (LSAS) Document Control Policy (D0070544)
3. Teleflex Governance Methodology (D0070588)

The most fundamental aspect of these objectives is the need to understand and comply with the applicable laws, rules, and regulations of the legal federal, state and local jurisdictions in which a Teleflex facility or supplier operates.

This policy draws upon internationally recognized standards and best practices to advance social and environmental responsibility. Teleflex is committed to developing and implementing those relevant policies and procedures that will facilitate the execution of these standards. Likewise, Teleflex expects that its suppliers will also strive to meet or exceed the standards and practices described within this document.

Teleflex references various resources and examples in developing this policy, including the International Labour Organization Standards (ILO), the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) guidelines, the Ethical Trading Initiative (ETI), the U.K. Modern Slavery Act 2015 and the U.N. Global Compact. Teleflex is committed to continuing to develop and maintain detailed standards that serve to clarify the way it operates its business relative to this policy, along with expectations for compliance among its suppliers and other affected partners.

## 2. LABOUR & HUMAN RIGHTS

Teleflex and its suppliers must uphold the human rights of all employees, whether full-time, part-time, temporary, student, contract or other employment status, and treat them with dignity consistent with standards and practices recognized by the international community.

Suppliers are encouraged to register with approved third-party platforms that support our Labour Standards and Sustainable Procurement Programmes and enable the sharing of labour and human rights performance data.

### 2.1. Modern Slavery Statement

Pursuant with Section 54(1) Transparency in Supply Chains etc. of the U.K. Modern Slavery Act 2015, Teleflex shall publish a ‘slavery and human trafficking statement' for each financial year of the

organisation (the "Modern Slavery Statement"). The Modern Slavery Statement will be publicly available via EMEA Teleflex.com. The Modern Slavery Statement shall set out the steps Teleflex has taken during the previous financial year to ensure that slavery and human trafficking is not taking place within its own organisation and supply chains. It is Teleflex's HR Department's responsibility to visit / inspect all Teleflex sites once a year?

The Modern Slavery Statement shall contain information relating to:

- the organisation and its supply chains;
- its policies in relation to slavery and human trafficking;
- parts of its business and supply chain where risks of slavery and human trafficking are the highest;
- its due diligence process to mitigate risks of slavery and human trafficking taking place in its business and supply chains;
- training and monitoring in relation to slavery and human trafficking; and
- Key performance indicators / objectives utilized to measure effectiveness.

### 2.2. Anti-Discrimination

Teleflex and its suppliers will not discriminate against any employee based on family status, civil status, race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, marital status, veteran status, genetic disposition or carrier status, or any other legally protected basis, in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline and termination. Teleflex and its suppliers will not discriminate against pregnant employees or require a pregnancy test, except where required by applicable laws or regulations or deemed prudent for protecting individual well-being or overall workplace safety. In addition, Teleflex and its suppliers will not utilize medical testing of employees or potential employees for discriminatory purposes. Teleflex and its suppliers may require certain medical testing where specified by applicable law or regulation or deemed prudent for protecting individual well-being or overall workplace safety.

### 2.3. Anti-harassment/Fair Treatment

Teleflex and its suppliers must be committed to a workplace free of harassment. Teleflex and its suppliers will not threaten employees with, or subject them to inappropriate behavior or practices, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse or unreasonable restrictions on entering or exiting company provided facilities.

### 2.4. Prevention of Involuntary Labour

Teleflex and its suppliers will not use any form of forced, bonded, indentured, or prison labour. All work must be voluntary, and employees must be free to leave work or terminate their employment. Employees must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

Teleflex and its suppliers will ensure that third party labour agencies providing employees are compliant with the provisions of this policy and applicable laws and regulations and shall also prohibit the use of worker paid recruitment fees.

Teleflex and its suppliers will ensure that contracts for both direct and contract employees clearly convey the conditions of employment in a language understood by the employee.

### 2.5. Prevention of Underage Labour

Child labour is strictly prohibited. The minimum age for employment or work will be 16 years of age. No person between the ages of 16 and 18 will be employed unless such employment is in compliance with the health, safety and moral provisions of the ILO Minimum Age Convention No. 138, ILO Recommendation No. 146 – Minimum Age Recommendation, ILO Recommendation No. 190 – Worst Forms of Child Labour and any other applicable law or regulation within the operating region.

### 2.6. Working Hours

Work weeks shall not exceed the maximum set by law within the operating region.

### 2.7. Wages and Benefits

Teleflex and its suppliers must pay all employees at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, any overtime hours shall be voluntary, and employees shall be compensated, at a minimum, for overtime hours at the rate required by applicable laws and regulations. Teleflex and its suppliers will not use deductions from wages as a disciplinary measure. Employees must be paid in a timely manner, and the basis on which employees are being paid must be clearly conveyed to employees in a timely manner.

### 2.8. Freedom of Association

Teleflex and its suppliers must respect the right of employees to associate freely, form and join employees' organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Teleflex and its suppliers will not specify non-union membership as a condition of employment. Teleflex and its suppliers must protect against acts of interference with the establishment, function, or administration of employees' organizations in accordance with applicable laws and regulations. All employees must be able to openly present grievances concerning the work environment or management practices without fear of reprisal.

## 3. HEALTH & SAFETY

Teleflex recognizes that integrating sound health and safety management practices into all aspects of business is essential in effectively managing risks and minimizing work related incidents while enhancing the quality of products and improving employee morale and retention. Suppliers must also be committed to creating safe working conditions and a healthy work environment for all their employees. Comprehensive policies and procedures are included in the Teleflex internal Global Knowledge Network's policy section under "Environmental Health and Safety" as well as in the individual Teleflex facilities. EH&S maintains a Global Manual, which incorporates the Company's Zero Harm Programme. This programme incorporates all elements of employee Health, Safety and Wellness as well as our Environmental programme.

## 4. THE ENVIRONMENT

Teleflex and its suppliers must recognize environmental responsibility as an integral part of all business practices. Teleflex expects its suppliers to actively support objectives and initiatives focused on reducing the environmental impact associated with product and process design, facility operation, and waste generation/emission. Suppliers are encouraged to join our third-party platforms that support our Sustainable Procurement Programme and share their environmental performance data.

## 5. ETHICS

Teleflex and its suppliers must be committed to the highest standards of ethical conduct when dealing with employees, suppliers, and customers. Teleflex has adopted a zero-tolerance policy regarding violations of certain business ethics and will take immediate and appropriate measures to address non-compliance with stated requirements and expectations.

Highlights are included below. Additionally, Teleflex publishes its comprehensive Code of Ethics policies on Teleflex.com and on its internal Global Knowledge Network (GKN). Click Code of Ethics for Policy and ethics reporting / numbers.

Suppliers are encouraged to join our third-party Sustainable Procurement Programme and share their ethical performance data.

### 5.1. Corruption, Extortion, or Embezzlement

Corruption, extortion and embezzlement, in any form, are strictly prohibited. Teleflex and its suppliers will not engage in corruption, extortion or embezzlement in any form. Violations of this prohibition may result in immediate termination as a Teleflex employee or supplier. Teleflex reserves the right to take legal action in connection with any violation of these prohibitions.

### 5.2. Disclosure of Information

Teleflex and its suppliers must disclose information regarding business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices. Falsification of records or intentional misrepresentation of conditions or practices is unacceptable and will result in appropriate corrective or legal action.

### 5.3. Privacy

Teleflex and its suppliers must be committed to protecting the reasonable privacy expectation of personal information within all levels of business including suppliers, customers, consumers and employees. Teleflex and its suppliers must comply with privacy and information security laws and regulatory requirements wherever personal information is collected, stored, processed, transferred and shared.

### 5.4. No Improper Advantage

Teleflex and its suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage, including personal fees, gifts or favours. Teleflex is sensitive to even the potential appearance of improper interactions. Teleflex employees who fail to comply with these requirements will be promptly disciplined as appropriate, up to and including termination. Suppliers failing to comply with

this guidance may be disqualified from conducting business with Teleflex.

### 5.5. Fair Business, Advertising, and Competition

Teleflex and its suppliers must uphold fair business standards in advertising, sales and competition.

### 5.6. Whistle-blower Protection and Anonymous Complaints

Teleflex and its suppliers must ensure the protection of whistle-blower confidentiality and prohibit retaliation against employees who participate in such programs in good faith or refuse an order that is in violation of their respective Codes of Ethics. Teleflex offers an anonymous complaint mechanism for employees and suppliers to report actual or perceived accounting or auditing improprieties in accordance with local laws and regulations.

Teleflex encourages suppliers and workers throughout its supply chain to report concerns relating to labour standards, human rights, ethics or modern slavery through available reporting channels without fear of retaliation.

These concerns shall be reviewed and communicated to appropriate stakeholders, including the Labour Standards Assurance System team, for assessment and follow-up as required.

### 5.7. Community Engagement

Teleflex, through our internal "**JOIN** Act with Purpose" programme, and its suppliers are encouraged to engage the community and stakeholders to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

### 5.8. Protection of Intellectual Property

Teleflex is committed to protecting intellectual property rights and safeguarding customer, supplier and company internal information. Teleflex utilizes confidentiality agreements when necessary to protect intellectual property rights of all parties.

### 5.9. Responsible Sourcing of Materials

Teleflex and its suppliers must take all reasonable measures to ensure that conflict minerals are not supplied nor used in the manufacturing of parts of products. Conflict minerals include, but are not limited to, tin, tantalum tungsten and gold originating from the Democratic Republic of the Congo and adjoining countries or other regions where the purchase of specific minerals may benefit groups that perpetuate the abuse of serious human rights. Teleflex and its suppliers will practice an appropriate level of due diligence to ascertain the origin of conflict minerals. For more information, visit Teleflex.com.

## 6. SUPPLIER DIVERSITY

Teleflex has established processes and practices that establish a fair, open and inclusive business environment that ensures a diverse supply chain of capable, qualified business partners. Examples include a Supplier Diversity statement on the Teleflex.com public website as well as internal policies and work instructions outlining requirements. For more information, visit Teleflex.com.

## 7. MANAGEMENT SYSTEMS

Teleflex is committed to maintaining a management system designed to 1) ensure compliance with this policy and applicable laws and regulations; 2) identify and mitigate related operational risks; and 3) facilitate continuous improvement. The management system shall address the following elements:

### 7.1. Company Commitment

This policy shall be communicated to Teleflex employees via internal posting on the company intranet "Global Knowledge Network" (GKN) (click here) and endorsed by Teleflex Executive Management through our Management Reviews as part of our Labour Standards Programme.

Management Reviews are carried out as part of the Teleflex Labor Standards Assurance System and shall be conducted on a quarterly basis at a minimum. Sessions are led by the LSAS (Labor Standards Assurance System) Coordinator and shall require at least one Executive Sponsor in attendance.

Management Reviews shall be conducted at least quarterly and shall include, as appropriate:

- Review of LSAS objectives and targets;
- Programme performance metrics and KPIs;
- High-risk suppliers and emerging risks;
- Audit and assessment results;
- Corrective Action status and effectiveness;
- Modern Slavery and Human Rights due diligence activities;
- Regulatory and stakeholder requirements;
- Resource requirements;
- Continuous improvement opportunities.

At least annually, Management Review shall include:

- Review of this Policy;
- Approval of annual LSAS objectives and targets;
- Review of programme effectiveness;
- Strategic direction and future priorities.

Significant programme decisions impacting labour standards governance, supplier risk management, audit strategy or remediation activities shall be documented and retained as part of LSAS programme governance records.

### 7.2. Management Accountability and Responsibility

Teleflex Management is committed to supporting this policy. The Vice Presidents of Global Procurement and Human Resources are jointly responsible for ensuring implementation, compliance and periodic review of the policy.

### 7.3. Training

Training of key staff in Procurement, Human Resources and Quality is conducted annually, and each employee must complete a declaration of understanding and attendance. The training covers the LSAS programme objectives, Modern Slavery and Human Trafficking and summarises the expectations of each employee relating to Labour Standards.

### 7.4. Objectives, Targets and KPIs

Objectives, targets, and performance metrics shall be applied based on supplier risk and vendor category, as appropriate, and periodically reviewed to ensure they remain relevant, measurable, achievable, and aligned with programme maturity, available resources, and business requirements.

Teleflex establishes, monitors, and periodically reviews key performance indicators (KPIs) to evaluate the effectiveness of its Labour Standards Assurance System (LSAS) and support continual improvement. KPI measurement includes, but is not limited to, the following areas:

- Strengthening Responsible Procurement and ESG Performance through supplier sustainability engagement and responsible sourcing initiatives.
- Maintaining a Responsible and Resilient Supply Chain through supplier risk assessment and monitoring activities.
- Driving Continuous Improvement Through Data and Transparency by tracking corrective action implementation, closure, and effectiveness.
- Building Capability and Awareness through labour standards training, communication, and stakeholder engagement programmes.

KPI results are reviewed by management on a periodic basis to assess programme performance, identify emerging risks, verify the effectiveness of corrective actions, and drive continuous improvement across the supply chain

### 7.5. Operational Control and Supplier Management

Sustainable Procurement including Labour Standards considerations shall be appropriately incorporated into Teleflex supplier management processes. Where a potential labour standards, human rights or modern slavery violation is identified, Teleflex shall conduct an appropriate risk assessment and remediation review. Relevant functions shall be engaged as necessary to determine appropriate mitigation, remediation, escalation, disclosure and supplier management actions.

### 7.6. Communication

Teleflex shall establish processes for internal and external communication regarding its Labour Standards Assurance System.

**Internal communications may include:**

- Labour Standards Policy on the Internal Teleflex Global Knowledge Network (GKN) and on Teleflex.com
- Annual employee training and awareness programmes
- Management Review Outputs
- Policy updates and procedural changes

**External communications may include:**

- Labour Standards Policy and Modern Slavery Statement on Teleflex.com
- Annual Global Impact Report (GIP)
- Supplier Business Reviews (SBRs)

Communications shall be maintained in a manner that promotes transparency, awareness and continual

improvement of the LSAS programme.

### 7.7. Audits and Assessments

Global Procurement carries out periodic self-evaluations, Corporate Compliance Assessments and / or third-party reviews shall ensure suppliers' compliance with this policy. This includes scheduling supplier audits to review suppliers' LSAS and using third party software platforms and SMETA Audits as part of our Sustainable Procurement Programme

### 7.8. Corrective Action Process

Teleflex has in place a decision tree process and procedure for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation or review. This process includes specific remedies if the responsible party does not complete the defined corrective actions in a timely and acceptable manner.

Significant labour standards allegations or violations shall be escalated in accordance with the Labour Standards Risk Assessment and Remediation Process. Escalation may include review by Legal, and Executive Management and consideration of reporting obligations under applicable legislation, including Modern Slavery reporting requirements.

A monthly review of open Corrective Actions is in place to support this process.

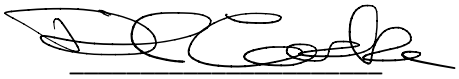
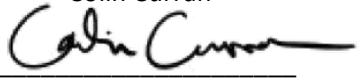
### 7.9. Documentation and Records

Teleflex shall establish a method of documenting and recording compliance, Environment, Health, and Safety, supplier and employee data as required by this policy. Teleflex will put in place the systems and process to ensure that they comply with applicable data protection regulations and legislation.

This policy with associated procedures and LSAS documentation shall be reviewed following any significant change to legal requirements, business operations, organisational structure, supplier risk profile or programme requirements.

In the absence of significant changes, a formal review shall be conducted at least annually to ensure continuing suitability, adequacy and effectiveness.

**Policy Approval**

| | | |
|---|---|---|
| Title: | VP Global Procurement | VP Human Resources |
| Print Name: | David Clarke | Colin Curran |
| Signature: |  |  |
| Date: | 20-October-2026 | 21st October 2026 |

## 8. REFERENCES

Please refer to the following websites for information pertaining to standards used to create this policy:

**Ethical Trading Initiative** – https://www.ethicaltrade.org - Website

**ILO Code of Practice in Safety & Health** https://www.ilo.org/global/topics/safety-and-health-at-work/lang-en/index.htm - Website

**ILO International Labour Standards** – https://www.ilo.org/global/standards/lang--en/index.htm - Website

**ISO 14001** - https://www.iso.org/iso-14001-environmental-management.html - Website

**Modern Slavery Act 2015** - https://www.legislation.gov.uk/ukpga/2015/30/contents - Website

**OECD Guidelines for Multinational Enterprises** - https://www.oecd.org/corporate/mne/ - Website

**United Nations Convention Against Corruption** - https://www.unodc.org/unodc/en/treaties/CAC/ - Website