

TELEFLEX LABOR 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) and the U.S. Department of Labor among others. Teleflex shall commit to continuous improvement in an effort to achieve full compliance to the standards within its own facilities as well as its supply chain. Teleflex is committed to meeting and ultimately exceeding the minimum standards as outlined in this policy and related procedure.

Details are spelled out in the following sections:

- LABOR AND HUMAN RIGHTS
- HEALTH & SAFETY
- THE ENVIRONMENT
- ETHICS
- MANAGEMENT SYSTEMS

SCOPE

This policy applies to all Teleflex locations. Teleflex shall also strive to ensure that its suppliers adhere to the minimum standards which are defined within this policy. Regional differences in labor standards shall be addressed on a case by case basis; however, this policy is expected to cover the requirements for global compliance.

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1. POLICY

This policy and its accompanying procedure shall be used as its guiding Labor Standards Assurance document, outlining a series of minimum requirements which are based on the fifteen (15) actions identified as part of the Labor Standards Assurance System (LSAS) which requires that minimum working conditions in each of its facilities and, to the extent possible, throughout its supply chain, are safe, that all employees are treated with respect and dignity, and that sourcing and manufacturing processes are managed in an environmentally and socially responsible fashion. 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 an organization operates. This policy draws upon internationally recognized standards and best practices in order to advance social and environmental responsibility. Teleflex is, to the best of its ability, committed to developing and implementing those relevant policies and procedures that will facilitate the execution of this standard. 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 Electronic Industry Citizenship Coalition (EICC) Code, the International Labour Organization Standards (ILO), the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) guidelines, and the Ethical Trading Initiative (ETI). Teleflex will continue to develop and/or maintain detailed standards that serve to clarify the manner in which we will operate our business relative to this policy along with expectations for compliance among our suppliers and other affected partners.

2. LABOR & 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.

2.1. Anti-Discrimination

Teleflex and its suppliers will not discriminate against any employee based on family status, civil status, race, color, 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.

2.2.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.

2.3.Prevention of Involuntary Labor

Teleflex and its suppliers will not use any form of forced, bonded, indentured, or prison labor. All work must be voluntary and employees will 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 labor agencies providing employees are compliant with the provisions of this policy and applicable laws and regulations. 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.

2.4.Prevention of Underage Labor

Child labor 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 morals provisions of the International Labour Organization (“ILO”) Convention No. 138.

2.5.Working Hours

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

2.6.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, employees shall be compensated for overtime hours at the rate required by applicable laws and regulations at a minimum. Teleflex and its suppliers will not use deductions from wages as a disciplinary measure, except where permissible by law and then only after documented due process indicates such measures are warranted and appropriate. 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.

2.7. 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 of 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 locations.

3.1. Occupational Injury Prevention

Teleflex and its suppliers must eliminate physical hazards where possible. Where physical hazards cannot be eliminated, Teleflex and its suppliers must provide and maintain appropriate engineering controls such as physical guards, interlocks, and barriers where machinery and equipment present a risk of injury to employees and operators. Where engineering controls are not possible or feasible, Teleflex and its suppliers must establish appropriate administrative controls such as safe work procedures. In all cases, Teleflex and its suppliers must provide employees appropriate personal protective equipment relative to the physical hazards in the workplace that cannot be adequately minimized through engineering and/or administrative controls. Employees must have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

3.2. Industrial Hygiene/Prevention of Chemical Exposure

Teleflex and its suppliers must identify, evaluate, and control employee exposure to hazardous chemical, biological, and physical agents. Teleflex and its suppliers must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, Teleflex and its suppliers must provide appropriate engineering controls such as closed systems and ventilation. Where engineering controls are not possible or feasible, Teleflex and its suppliers must establish appropriate administrative controls such as safe work procedures. In all cases, Teleflex and its suppliers must provide employees appropriate personal protective equipment relative to chemical hazards in the workplace that cannot be eliminated or minimized through engineering and/or administrative controls.

3.3. Emergency Prevention, Preparedness, and Response

Teleflex and its suppliers must anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures that include emergency reporting, employee notification and evacuation procedures, employee training and drills, provision of appropriate first-aid supplies, fire detection and suppression equipment, adequate exit facilities, and recovery plans.

3.4. Occupational Safety Procedures and Systems

Teleflex and its suppliers must establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems should encourage incident reporting, classification and recording of all work-related injuries and illnesses, incident analysis to determine root cause and implementation of corrective measures to eliminate or minimize the likelihood of recurrence, provision of necessary medical treatment, and facilitation of the employees' return to work.

3.5. Ergonomics/Physically Demanding Work

Teleflex and its suppliers must identify, evaluate, and control employee exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, extended work in awkward posture(s) and highly repetitive tasks or tasks requiring forceful exertions. Such hazards will be addressed through engineering controls wherever feasible. Employee engagement is an essential element within the process of identifying effective ergonomic risk controls and will be integral to the overall ergonomic program strategy.

3.6. Communication of Workplace Health & Safety Information

In order to foster a safe work environment, Teleflex and its suppliers will ensure that employees receive appropriate workplace health and safety information and training, including written health and safety information and warnings in the primary language of its employees. Teleflex and its suppliers must have available for employees review Safety Data Sheets for any chemicals used in the workplace and properly train all employees who will come into contact with such substances in the workplace.

3.7. Employee Environmental, Health and Safety Committees

Teleflex and its suppliers are encouraged to initiate and support employee environmental, health and safety committees to enhance ongoing environmental, health and safety education and to encourage employee input regarding environmental, health and safety issues in the workplace.

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.

4.1. Hazardous Substance Management and Restrictions

Teleflex and its suppliers must comply with the most recent version of any applicable laws, directives and regulations prohibiting or restricting specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Teleflex and its suppliers must identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal. Teleflex and its suppliers must also exercise their duty of care responsibilities associated with the transportation and disposal of waste materials leaving their locations.

4.2. Wastewater and Solid Waste Emissions

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities must be monitored, controlled, and treated as required by applicable laws and regulations before discharge or disposal.

4.3. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations must be characterized, monitored, controlled, and treated as required by applicable laws and regulations before discharge.

4.4. Environmental Permits and Reporting

Teleflex and its suppliers must obtain and maintain all required environmental permits and registrations (e.g. air emissions, waste water discharge, storm water control, hazardous waste disposal) and adhere to all operational and reporting requirements. All compliance- related records should be kept in order to demonstrate permit compliance.

4.5. Pollution Prevention and Resource Preservation

Teleflex and its suppliers must endeavor to reduce or eliminate waste of all types, including hazardous, non-hazardous, water and energy wastes, by implementing appropriate measures in their facilities, and in their maintenance and production processes, with specific focus on opportunities to recycle, re-use, or substitute potentially harmful materials. Life cycle analysis throughout the supply chain is encouraged to facilitate resource preservation and overall sustainability.

4.6. Product Content/Origin Restrictions

Teleflex and its suppliers will adhere to all applicable laws, directives, regulations regarding prohibition or control of restricted substances and origin of raw materials used in the manufacture of products, including those related to labeling, packaging, recycling and disposal. Teleflex and its suppliers will practice reasonable due diligence, as defined or represented within current and recognized industry practices, in the characterization of applicable parts and products relative to restricted substance or sourcing regulations, requirements and reasonable customer requests. Documentation of such efforts will be compiled and maintained according to specified timeframes within pertinent regulations and/or agreements. Teleflex suppliers are expected to fully cooperate in the product characterization process

upon request, particularly with respect to provision of compliance statements and other forms of recognized documentation of product composition.

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 in its Global Knowledge Network (GKN). The following documents are posted on the GKN and are accessible to all Teleflex employees:

Business Ethics & Compliance Program of Teleflex Incorporated

Code Of Ethics For Chief Executive Officer & Senior Financial Officers

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 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 favors. 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.Whistleblower Protection and Anonymous Complaints

Teleflex and its suppliers must ensure the protection of whistleblower 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 Conduct. Teleflex offers an anonymous complaint mechanism for employees to report actual or perceived accounting or auditing improprieties in accordance with local laws and regulations.

5.7.Community Engagement

Teleflex and its suppliers are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

5.8.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.

5.9.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.

5.10. Responsible Sourcing of Materials

Teleflex and its suppliers must take all reasonable measures to assure 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. Additional related policies are available via the company intranet (GKN).

6. MANAGEMENT SYSTEMS

Teleflex is committed to establishing 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:

6.1. Company Commitment

This policy shall be communicated to Teleflex employees via email and/or internal posting on the company intranet “Global Knowledge Network” (GKN) and endorsed by Teleflex Executive Management.

6.2. Management Accountability and Responsibility

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

6.3. Legal Requirements

This policy and related procedures are reviewed, monitored and endorsed by the Teleflex Legal team, which is responsible for interpreting applicable laws and regulations and the additional requirements imposed by this policy.

6.4. Audits and Assessments

Periodic self-evaluations, Corporate Compliance Assessments and/or third party reviews shall ensure suppliers’ compliance to this policy. This may include scheduling supplier audits in order to review suppliers’ labor standards assurance systems.

6.5. Corrective Action Process

Teleflex is committed to developing a procedure for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation or review. This process may include specific remedies if the responsible party does not complete the defined corrective actions in a timely and acceptable manner.

6.6. Documentation and Records

Teleflex shall establish a method of documenting and recording compliance, EHS, supplier and employee data as required by this policy.

1. REFERENCES

Please refer to the following websites for information pertaining to standards outlined within this policy:

Eco Management & Audit System www.quality.co.uk/emas.htm

Electronic Industry Code of Conduct, October 2004
www.hp.com/hpinfo/globalcitizenship/environment/pdf/supcode.pdf

Ethical Trading Initiative www.ethicaltrade.org/

ILO Code of Practice in Safety and Health
www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001 www.iso.org

National Fire Protection Agency www.nfpa.org/catalog/home/AboutNFPA/index.asp

OECD Guidelines for Multinational Enterprises www.oecd.org

OHSAS 18001 www.bsi-global.com/index.xalter

SA 8000 www.cepaa.org/

SAI www.sa-intl.org

United Nations Convention Against Corruption

www.unodc.org/unodc/en/crime_convention_corruption.html

United Nations Global Compact www.unglobalcompact.org

Universal Declaration of Human Rights www.un.org/Overview/rights.html

UN Norms on the Responsibilities of Transnational Corporations and other Business Enterprises with Regard to Human Rights www.ohchr.org