

Purpose and Scope

Elcam Medical A.C.A.L (Elcam) has a long-standing commitment for conducting business according to the highest standards of integrity and business ethics. Elcam holds its suppliers to the same high standards, and will only maintain relationships with those suppliers who demonstrate a commitment to:

- Compliance with Laws and Regulations
- Ethical Business Practices
- Human Rights/Fair Labor and Employment Standards
- A Safe and Healthy Workplace
- Environmental Responsibility

This **Supplier Code of Conduct** outlines our expectations and minimum requirements for all direct material and service suppliers (Suppliers). Elcam reserves the right to assess Suppliers adherence to the principles set forth in this Code of Conduct, and may, from time to time, suggest certain remediation measures to be taken. A Supplier's failure to conform to principles of this Code of Conduct may lead to disqualification from consideration or termination of the relationship. Elcam may amend this Supplier Code of Conduct from time to time. The most up to date version can be found on our website.

Suppliers are expected to seek guidance from or report actual or suspected violations of this Supplier Code to Elcam management or Legal department without delay.

Reports or inquiries should be directed to: Supply chain manger – **Eli Tsoor** eli.ts@elcam.co.il

Compliance with Laws and Regulations

Suppliers are required to operate in full compliance with all laws, rules and regulations that apply to their operations globally, including but not limited to, laws regarding ethical business practices, human rights, labor and employment, environmental protection, and health and safety. Suppliers are expected to follow generally accepted industry standards and to obtain and maintain in good standing all necessary permits, approvals, licenses and registrations from relevant regulatory bodies.

Ethical Business Practices

Elcam prohibits all forms of corruption, misrepresentation, extortion or bribery. Suppliers are expected to comply with all applicable anti-corruption and anti-bribery laws. Suppliers must never pay or accept bribes or other improper inducement in any business or government interaction. All financial books and business records maintained by Suppliers must be truthful, accurate and complete. Suppliers are expected to avoid all conflict of interest, whether actual or perceived. Suppliers must never provide inducement or favors to Elcam employees or to those working on behalf of Elcam to secure an improper advantage or to obtain or retain business. Suppliers must safeguard Elcam intellectual property rights and confidential information.

Human Rights, Fair Labor and Employment

Elcam respects the human rights of all workers and will not tolerate any form of human rights or labor abuse relevant to its supply chain.

Prohibition Against Involuntary Labor, Child Labor, Human Trafficking

Suppliers shall not use, support, or permit slavery, forced labor, child labor or trafficking of any kind within its operations. Suppliers must ensure all workers are of legal age for employment in their local country. Suppliers must maintain official and verifiable documentation of each employee's date of birth, or lacking this documentation, have a legally recognizable means of confirming each employee's age. Upon request, Suppliers shall certify that they have implemented reasonable measures to comply with all laws regarding modern slavery and human trafficking.

Non-Discrimination

Elcam values diversity, equality and belonging and condemns discrimination of any kind, including but not limited to, discrimination on the basis of age, race, gender, disability or religion. Suppliers are prohibited from engaging in any form of unlawful workplace discrimination.

Fair Wages and Benefits

Wages paid by Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Working Hours and Overtime

Suppliers shall comply with applicable laws on regular working hours and overtime. Overtime hours should entitle employees to receive overtime pay, at a rate higher than the employee's regular wage.

Tel: 972-4-698-8120/1
Fax: 972-4-698-0777

www.elcam-medical.com
Baram 1386000, Israel | sales@elcam.co.il

Conflict Minerals

Conflict Minerals Suppliers shall determine whether the products they sell to Elcam contain any tin, tantalum, tungsten and gold ("3TG"), and if so, whether these minerals directly or indirectly financed or benefited armed groups that are perpetrators of human rights abuses in the Democratic Republic of Congo or any adjoining country. Suppliers shall undertake reasonable efforts to perform due diligence on the source and chain of custody of these minerals and make their due diligence and findings available to Elcam upon request.

Safe and Healthy Workplace

Suppliers must conform to all applicable health and safety laws and regulations, as well as applicable industry regulations. Suppliers must have a program or other appropriate mechanism to monitor and enforce compliance with health and safety requirements. Suppliers are responsible for assuring that all of its employees are provided with a safe, clean and healthy place to work. All workers should be qualified at least to perform their work functions safely and training should be documented.

Environmental Responsibility

Environmental responsibility is integral to delivering world class products that create patient and community value. Elcam expects its suppliers to comply with all applicable environmental laws and regulations, including but not limited to:

- Compliance with Laws and Regulations
- Ethical Business Practices
- Human Rights/Fair Labor and Employment Standards
- A Safe and Healthy Workplace
- Environmental Responsibility

Suppliers should strive to eliminate or reduce waste of all types, including waste of materials, water and energy, by appropriate means. All hazardous materials and chemicals and solid waste generated from operations, must be disposed of using environmentally responsible practices. Elcam also expects its Suppliers to demonstrate a commitment to responsible environmental stewardship by implementing environmental management systems and continuously monitoring and improving their environmental performance. Management systems should track "key performance indicators" and establish meaningful short- and long-term improvement targets.

Tel: 972-4-698-8120/1
Fax: 972-4-698-0777

www.elcam-medical.com
Baram 1386000, Israel | sales@elcam.co.il