

TELEFLEX INTEGRITY CODE

Teleflex is committed to ensuring that Teleflex employees and agents (“Associates”) adhere to the highest standards of conduct, including compliance with all applicable anti-kickback, anti-bribery, ethical business and anti-corruption laws in each country where Teleflex conducts business. In addition, Teleflex understands and respects the obligations of Government Officials (“GOs”) to their respective governments and Health Care Professionals (which includes Health Care Organizations (“HCPs”)) worldwide to act in the best interest of – and make independent decisions regarding – the health care of their patients. This set of Policies is intended to ensure Teleflex Associates continue to conduct business worldwide in accordance with our core values. These Policies are intended to provide additional direction and clarity to Teleflex’s existing policies regarding anti-corruption and interactions with HCPs and GOs.

It is the responsibility of each Business Unit and Regional President (“BRP”) to implement appropriate internal processes to ensure compliance with this Code, including processes that document adherence to each Policy set out below for auditing and monitoring purposes. This includes the provision of training on the Code and each Policy in coordination with the Chief Compliance Officer (“CCO”). In all instances where BRP or CCO is used in this Code, the term also includes the BRP’s or CCO’s designee.

This Code provides guidance on the following subject matter areas:

1. Gifts, Entertainment, and Appropriate Business Meals
2. Educational and Research Grants
3. HCP Engagements
4. Congresses, Trade Shows, and Academies
5. Samples and Product Evaluations
6. Market Research
7. Authorship
8. Patient Interactions
9. Teleflex Medical Training and Education
10. Humanitarian Aid and Charitable Donations
11. Reporting Compliance Concerns

This Code **DOES NOT** cover the following topics: 1) Clinical Research led by Teleflex; 2) Adverse Event Reporting; 3) Global Trade Compliance; 4) Anti-Trust; 5) Off-label Promotion, Mislabeling, Misbranding; or 6) the Promotional Review Process. Guidance around these topics is covered in other legal, regulatory, and CMA policies and procedures. This Code is intended to cover the most common interactions with HCPs and GOs by Teleflex Associates.

- **Policy #1 – Gifts, Entertainment, and Appropriate Business Meals**
 - Gifts. Teleflex Associates may not provide gifts or educational items to GOs, HCPs or patients (including personal gifts) outside of the circumstances set out in the applicable *Gifts IPP* without the written permission of the BRP and CCO. In particular, gifts of cash or cash equivalents (e.g. gift certificates and gift cards) **must never be given to a GO or HCP**.
 - Any gift permitted by the BRP and CCO must be modest, reasonable, and in compliance with all applicable IPPs, and given infrequently, so far as any individual recipient is concerned. All permitted gifts must be of a nature that would not negatively impact

Teleflex's reputation if the gift were to be publically disclosed and should be aligned with cultural courtesy in the applicable region.

- No gifts or educational items can be provided to improperly influence or reward an act or decision for any benefit to Teleflex nor in response to a request made by an HCP or GO.
- Entertainment. Teleflex Associates **may never** provide entertainment to GOs or HCPs. This includes but is not limited to: 1) no golf/tennis outings; 2) no concerts; 3) no sporting events; 4) no tourist attraction events or sightseeing; 5) no theater tickets; or 6) no engaging in or facilitating any activity that may be perceived as entertainment.
- Appropriate Business Meals. It is permissible and appropriate to have a drink, meal, or appetizers at a local hotel, restaurant, or bar with a proper business purpose with a GO or HCP, as long as, the venue itself cannot be considered entertainment (e.g. House of Blues, Hooters, etc.) and such interaction is permitted under local law.
- Meals can be provided during a sales, promotional, or other business discussion with the HCPs or GOs; however, Teleflex may not fund the costs of individual HCP's or GO's travel and accommodation for the purposes of sales and promotional meetings. Sales, promotional, and other business meetings are meetings between one or more HCPs and one or more Teleflex Personnel to discuss Medical Technology features, sales terms or contracts.
- Teleflex will neither provide nor pay for alcoholic beverages except during the dinner hour, and in general no more than two to three drinks per attendee. The entire bill, inclusive of all food and beverages, must be within meal limitations set forth in the Business Meals IPP.
- Regional finance should: 1) reimburse meal expenses in accordance with local laws; 2) establish monetary limits for GO and HCP business meals in local currency; and 3) monitor local compliance with such limits. Frequent or repeated violations of the GO or HCP business meal limits should be elevated to the BRP and CCO.

- **Policy #2 – Educational and Research Grants**

- Independence. Educational and Research Grants will not be provided or offered as a reward for past business or an inducement for future business to any HCP or to curry favor with any GO. Educational and Research Grants must be controlled by the recipient and Teleflex should not be involved in any way that is intended to inappropriately influence the content or activity funded by the Grant. Grants shall only be provided in response to a written request from Health Care Organizations or Conference Organizers. Educational and Research Grants may not be given to individuals.
- Requests. Teleflex Associates (e.g. Sales and Marketing) may not solicit, suggest, or recommend that any HCP or GO seek a Grant from Teleflex or submit a Grant request on behalf of an HCP or GO. This includes Grant requests related to sending HCPs to industry trade shows or congresses for educational purposes. All requests should come directly from the Health Care Organization or Conference Organizer to Clinical and Medical Affairs in the applicable region for review without input from sales personnel directly responsible for the customer account submitting the request.
- Review and Approval/Denial. Each region must set up a Grant Panel to review all Education Grants submitted by HCPs or GOs to Teleflex. Each Grant Panel will include at minimum four (4) members with at least one (1) representative from the following

departments: CMA, commercial, compliance, and finance. A member of CMA will be appointed as the Chairman of each Grant Panel. Each grant will be reviewed by the Grant Panel to ensure the following:

- It complies with all applicable continuing education credit requirements in the applicable region;
 - Due diligence is conducted regarding the reputation of the institution, organization, or association to verify the legitimacy of the organization making the request;
 - The request relates to Teleflex's therapeutic areas and interest in ensuring that HCPs or GOs are properly educated on the standard of care related to our products to enhance patient safety and the delivery of healthcare worldwide; and
 - For Educational Grants related to a congress, cost of travel, venue and the event program will be evaluated.
- Letter of Agreement. All approved Grants must be documented in a Letter of Agreement between Teleflex and the organization receiving the Grant. All Education Grants must be for the advancement of genuine medical education and Teleflex shall specify the intended purpose of the Grant in the Agreement.
 - Payments/In-kind Support. The amount of the Grant must be justified and reasonable, bearing in mind the subject matter of the request and all of the facts of the particular situation. Teleflex's support must not be excessive, so as to jeopardize the independence of the recipient's program. Finance **must not** release payment for any Grant without written documentation of Grant Panel approval and a signed Letter of Agreement including the exact amount approved. CMA is responsible to ensure that the funds are used as intended and any unused funds are returned back to Teleflex.
 - Documentation. The Chairman of each region's Grant Panel is responsible for all communication with Grant requestors regarding approval/denial and the status of all Grant requests. This responsibility **cannot** be delegated to sales personnel. The Grant Panel will keep documentation for (5) years of all Grant requests, their approval/denial status, the amount (if any) approved, and confirmation of payment /in-kind support to any recipient. For all Grant payments related to congress or trade show attendees, proof of attendance must also be verified and documented.

- **Policy #3 – HCP and GO Engagements**

- Legitimate Need. There must be a legitimate business purpose that is identified in the Annual Needs Assessment for the services provided by any HCP or GO Consultant. This service must be documented in a written agreement. It is never a legitimate business purpose to engage an HCP or GO 1) to improve a relationship with an HCP or GO; 2) to gain access to an HCP or GO; or 3) to reward an HCP or GO for past or future business.
- Selecting an HCP or GO. CMA should establish a process around selecting HCPs and GOs to perform consulting services for Teleflex within the following Policy:
 - The HCP's/GO's qualifications support the identified business needs of the engagement;
 - The number of HCPs/GOs contracted is appropriate to the needs identified (e.g. engaging six (6) for a Scientific Advisory Board instead of nine (9), if six (6) is all that is reasonably needed);
 - The frequency of the number of engagements for any one HCP or GO is reasonable and justified;

- The HCP or GO is screened for any criteria that might render the HCP or GO ineligible to perform work for Teleflex (e.g. sanctions, exclusions, conflicts of interest, felony convictions, medical license in good standing, or debarment); and
 - Commercial reasonableness is documented and approved by CMA for any HCPs traveling outside of their region to perform consulting services.
 - Where applicable, local legal and industry code requirements to notify an HCP's or GO's employer and/or obtaining permission from the applicable local regulatory body are met.
- Payments to HCPs or GOs.
 - Finance must implement local processes governing HCP/GO payments in each region. The documented process must include verification of the following prior to payment: 1) an executed written agreement between the parties; 2) performance of the services; 3) validity of all expenses; 4) all payments are directed to an account or address in the HCP's primary country of medical practice (or for GO's the country where they perform services for the local government) and not directed to charities or similar organizations; and 5) all payments are consistent with fair market value ("FMV") in the region and paid according to the financial terms of the written agreement.
 - If required, a process must be established to meet any local legal requirements for disclosure of payments to HCPs/GOs.
- Cross Border Engagements. When engaging an HCP/GO to perform services outside of their primary region of medical practice (or governmental employment) to conduct a service in another region (e.g., European HCP performing a service in Asia), the BRP and CCO must approve the engagement. The Teleflex legal entity within the HCPs/GOs primary country of medical practice (or governmental employment) will enter into a contract with the HCP/GO for the cross border engagement. Exceptions to the cross border engagement contracting requirements must be obtained from regional finance and compliance and appropriately documented.
- Contracting. A written contract, signed by both parties, that specifies the services to be provided is required **prior** to the provision of services by an HCP/GO. To ensure transparency into the transaction, documentation is required and must be maintained, even if compensation is not involved. At minimum, all HCP/GO contracts must include the following: 1) a requirement that the HCP/GO will comply with all applicable laws and industry codes; 2) nature of services to be provided including scope of work; 3) appropriate confidentiality provisions; 4) compensation rate consistent with FMV; 5) a requirement that the HCP/GO inform their employer, if required by local law; 6) certification that the HCP/GO is not currently subject to medical discipline or criminal sanction; 7) process for travel expense reimbursement; 8) disclosure requirement of the HCPs/GOs consultant status with Teleflex whenever they write or speak in public; and 9) an acknowledgement that Teleflex may observe or otherwise monitor the services rendered.
- Hospitality and Travel Expenses. All hospitality and travel expenses related to HCP/GO consulting services must meet the following requirements. The BRP will set up processes to ensure these rules are followed: 1) training and education venues are conducive to scientific interactions; 2) accommodations are reasonable and consistent with local legal requirements and cultural norms; and 3) **strict prohibition of advance payments to HCPs/GOs for arranging their own travel** (Teleflex pre-arranging and paying for travel ahead of time is permitted).

- Regional finance should 1) reimburse HCP/GO consulting meal expenses in accordance with local laws; 2) establish monetary limits for HCP/GO consulting meals in local currency; and 3) monitor local compliance with such limits. Frequent or repeated violations of the HCP/GO consulting meal limits should be elevated to the BRP and CCO.

- **Policy #4 – Congresses, Academies, and Trade Shows**

- Exhibits, Symposia, and General Congress Sponsorships. It is appropriate for Teleflex to sponsor industry held third party events such as congresses, academies, and trade shows. The BRP must implement a process that ensures the following:
 - The legitimacy of the requesting entity is verified;
 - The budget, sponsorship amount, and any other requested funds are at FMV for the exposure, advertising, and marketing activities Teleflex receives for participating in the event;
 - If required by the local industry code, the event program – rather than the event location – must be the main draw for the event, and it relates to the specialty and/or medical practice of the HCPs who attend the event and does not contain entertainment;
 - The event topics are of an educational, scientific, or professional nature consistent with Teleflex’s lines of business. **Any event that involves HCPs or GOs which is wholly or mainly of a social nature is not appropriate for Teleflex sponsorship or involvement;**
 - Event location and venue are appropriate based on the place of residence of the majority of attendees. If required by the local industry code, it must not be perceived as luxury or touristic/holiday- oriented or that of an entertainment venue;
 - Teleflex may not directly or indirectly influence the selection of program content, faculty, educational methods and materials or participants attending a third party educational event;
 - No support can be provided to facilitate the travel of HCPs/GOs spouses or guests that do not have a bona fide interest in the event; and
 - Any hospitality or travel provided to HCPs/GOs at third party organized events must be modest and reasonable and expressly allowed under the local industry code.

Teleflex may purchase satellite symposia packages at congresses and provide approved presentations on subjects consistent with the overall agenda. In these instances, Teleflex determines the content of the symposia and is responsible for selecting and engaging a speaker or speakers. Any speaker’s engagement must be done in compliance with Policy # 3.

- Sponsorship of HCP Delegates. **It is not permissible to provide direct Delegate Sponsorship of HCPs to industry trade shows, congresses, and academies for European HCPs (with exception to procedural trainings organized by third parties).**

- **Policy #5 – Samples and Product Evaluations**

- General Policy. Teleflex may provide samples to HCPs/GOs free of charge under appropriate circumstances. The BRP and regional finance head must create and implement a process that ensures the provision of product samples complies with the items below and appropriately tracks and accounts for all samples.
 - Samples are provided to HCPs/GOs that are qualified to dispense the product;
 - The product is appropriately cleared by the regulatory authority in the country where it is dispensed for use on the market (e.g. FDA).

- The sample is intended **only** as a benefit to properly qualified indigent patient (i.e. as part of a charitable donation) or to allow the HCP/GO to evaluate the product for future use.
- Free samples may not be given for an HCP's or GO's personal benefit and may not be given to an HCP for subsequent resale or billing for reimbursement purposes.
- Frequency. Free samples may only be provided to a specific HCP/GO in amounts reasonably necessary to support patient care, or to permit the HCP/GO to adequately evaluate the product for future use. The BRP, CMA and regional finance head must establish reasonable limits (specific number per product type to allow auditing and monitoring) on free samples in each region and implement a process that appropriately tracks and accounts for the samples provided to HCPs and GOs.
- Capital Equipment or Multiple Use Product Evaluations. All capital equipment placement and multiple use product evaluations must be placed in accordance to local law and industry code. Each evaluation must have a written agreement which includes provisions covering: 1) Teleflex's continued ownership of the capital equipment or multiple use product during the evaluation period, 2) the exact number of days in the evaluation period and; 3) that the HCP/GO is financially responsible for loss and/or damage of the equipment or product during the evaluation period.

- **Policy #6 – Market Research**

- General Policy. Market Research must be initiated and conducted in a manner that is not promotional in nature. Market Research is intended to gather information about a product, disease area, or other topic of interest to Teleflex to be used in future marketing or product development activities.
 - The Market Research activity itself must not be conducted with the intent to promote Teleflex's product (clarify it is the research itself).
 - It may be done in the form of questionnaires or structured interviews (or other qualified approaches with BRP and CCO approval).
 - Market Research must be conducted according to a defined market research plan that describes the objectives and conduct of the research.
 - It is permissible to pay HCPs (in local currency) to participate in Market Research at an FMV rate established by CMA, the regional finance head, and CCO and must be done in accordance with a written agreement.
 - Statistics and data derived from Market Research must be used for marketing activities and/or promotional content, only in compliance with local applicable laws and regulations.
- Engaging Third Party Market Research Agencies ("Agency"). The following Policy must be followed and implemented by the BRP and regional finance head:
 - Verification that the Agency is reputable.
 - A clear task (detailed justification and description of objectives of the Market Research) must be provided to the Agency.
 - The Agency will select the HCP participants based on criteria provided by Teleflex and agreed upon by the BRP and CCO. Teleflex will have no additional input in HCP selection outside of the set list of criteria provided.
 - The Agency is responsible for the quality of the questionnaires used in the Market Research.
 - Teleflex must use the data collected through the Agency for marketing and/or promotional content, in compliance with local applicable laws and regulations.

- The terms between Teleflex and the Agency must be set out in a written agreement prior to engagement (which includes the terms detailed under Policy #6). The agreement must also contain a specific term that requires all payments to HCPs be paid in accordance with the FMV established by Teleflex and approved by CMA.

- **Policy #7 – Authorship**

- General Policy. Teleflex **must** review all abstracts, presentations, manuscripts, or other public disclosures pertaining to Teleflex sponsored publications or presentations before they are made available to the public.
- Teleflex follows the authorship credit criteria laid out by the International Committee of Medical Journal Editors (“ICMJE”). In order for an HCP to receive authorship credit for a publication related to Teleflex, the BRP will ensure **ALL** of the following conditions are met:
 - Substantial contributions to conception and design, acquisition of data, or analysis and interpretation of data;
 - Drafting the article or revising it critically for important intellectual content; and
 - Final approval of the version to be published.
- Acquisition of funding, collection of data, or general supervision of the research group alone does not constitute authorship (e.g. Teleflex cannot ghost write an article for publication and give an HCP authorship credit simply because he/she provided the data used in the publication).
- Disclosure Requirements. Teleflex supports transparency in financial disclosure for publications. As such the BRP will ensure the following disclosure conditions are met prior to approving an article, speech, publication, abstract, or public written work for Teleflex:
 - For all Teleflex supported studies, the author will disclose at the beginning or end of the publication that financial support was provided by Teleflex.
 - All authors will provide all disclosures required by journals, organizations, or congresses under whose auspices the publication or data will be published or presented.
 - Teleflex employed authors must disclose their employment status.
 - If a Teleflex employed author has a specific financial relationship with a product that is the subject of the publication or presentation that relationship must be disclosed (e.g. a product manager’s bonus being tied to a specific products revenue, where that employee also author’s an article about that product).
- Teleflex does not compensate HCPs for authoring abstracts, publications or poster presentations, in which HCPs would like to remain independent.

- **Policy #8 – Patient Interactions**

- Patient Interactions. Patient interactions are non-promotional activities. Their purpose is to receive knowledge enhancing information (e.g. patient advisory boards) or to obtain insight into the patient journey (e.g. patient experience events). The ultimate purpose of all patient interactions is to enable better patient outcomes. The BRP must create a process that ensures the following safeguards are followed in their region:
 - Most jurisdictions have very specific laws/rules around direct to consumer advertising. Therefore, legal and regulatory should be involved in any review/approval process at a local level for any direct-to-consumer advertising.

- Any participation of patients, caregivers, or their physicians must be based on the explicit consent of the patient, caregiver, or physician involved prior to their interactions with Teleflex.
 - Any participation of a patient in any video, photograph, or service must be based on a written contract approved by legal regardless of whether compensation is offered.
 - Patients can be compensated for the time spent on appropriate Teleflex projects. The BRP must reasonably define patient compensation and document it locally prior to any event. No compensation may be offered or provided if it is intended to have an inappropriate influence on patients.
 - Teleflex must not in any way influence patient testimony. Freedom of speech is guaranteed.
- **Policy # 9 – Teleflex Product Training and Medical Education**
 - General Policy. Teleflex may organize Product Training and Educational Meetings with HCPs so long as the training and education offered through such meetings is provided by Teleflex Associates or Consultants (under written contract with Teleflex) qualified to explain the appropriate use of Teleflex products and the attendee selection criteria is documented and approved by CMA. Commercial reasonableness will need to be documented and approved by CMA for any HCPs attending a Product Training and Education Meeting outside of their region. It is appropriate to organize Product Training and Educational Meetings to address:
 - Training on appropriate use of Teleflex products, consistent with the Teleflex products' indications for use approved by the applicable regulatory bodies;
 - Education regarding how to apply the approved indications and uses of Teleflex products to the continuum of care (reference to treatment of specific disease states is allowed only when consistent with approvals issued by the applicable regulatory bodies); and
 - Training on the qualities, properties, and/or design characteristics of Teleflex products as related to approved indications for use of such products.
- **Policy # 10 Humanitarian Aid and Charitable Donations**
 - General Policy: Teleflex may make donations of money, products or services to bona fide non-profit entities, charitable organizations, missions or other organizations supporting charitable projects or for other philanthropic purposes. Donations cannot be tied to past, present or future use of Teleflex's products. All requests for donations from the charitable organizations must be submitted in writing and approved in advance of payment. It is forbidden to support a charity at the request of an HCP, to target a donation to an HCP, or use a donation as an encouragement or reward for an HCP using, recommending, purchasing or prescribing Teleflex products
 - Appropriate written documentation setting forth the terms and conditions of the donation must be in place with the requesting charitable organization after the approvals have been obtained and before the donation is made.
 - All payments/in-kind support must be made to organizations and not individuals.

- **Policy #11 Reporting Compliance Concerns**

- General Policy: Any person who knows or suspects violations of this Code by any employee or Third Party working for or on behalf of Teleflex shall report it through one or more of the following channels:
 - Regional Compliance Officer
 - Chief Compliance Officer, VP
 - Teleflex's Vice President Internal Audit
 - Teleflex's General Legal Counsel
 - Or through the Ethics Line at www.TeleflexEthicsLine.com
 - Available 24/7 and 365 days a year.
 - Concerns can be reported anonymously via the internet or on the phone.
 - Available in Italian

Neither Teleflex employees, nor its Third-Party Representatives will be subjected to retaliation for good faith reports of suspected violations.

Internal processes should be implemented for the following subject matter areas and will be referred to as Integrity Policies and Procedures (“IPPs”).

1. Gifts/Educational Items
2. Business Meals
3. Educational Grants
4. HCP Consultant Engagements
5. Congresses and Trade Shows
6. Delegate Sponsorship
7. Samples, Demo and Product Evaluations
8. Market Research
9. Product Training and Medical Education

Any person who knows or suspects violations of this Code by any Teleflex Associate or third party working for or on behalf of Teleflex shall report it to the Teleflex Compliance, Legal or Internal Audit departments, the CCO or the Ethics Line at www.TeleflexEthicsLine.com. Teleflex Associates will not be subjected to retaliation for good faith reports of suspected violations.