

Cochlear  
**Supplier Code  
of Conduct**



# Our Story

For over 40 years Cochlear has been bringing people all over the globe into the world of sound. Professor Graeme Clark, an Australian ear surgeon, saw first-hand the isolation and frustration that comes from living in a world of silence as his father struggled with hearing difficulties. On holiday in 1977, fiddling with a shell and a blade of grass, Graeme realised there was a safe way to insert electrodes into the inner ear. It was Graeme's determination to help others that realised our first implantable solution, reconnecting Rod Saunders to hearing and bringing music into his life. Today, Cochlear is the leader in implantable hearing solutions, connecting hundreds of thousands of people globally to a life full of hearing. The pioneering spirit that started Cochlear all those years ago continues to drive us forward and our commitment is stronger than ever. We're transforming the way people understand and treat hearing loss, and we're committed to reaching more people to provide support for a lifetime of hearing.



# 1. Introduction

This Supplier Code of Conduct (Code) outlines the standards of behaviour we require our Suppliers to maintain in relation to human rights, corporate governance, ethics, safety and environmental sustainability. Cochlear will work with our valued suppliers to encourage the standards outlined in this Code to be met.

## 2. Human rights and labour practices

### Human Rights

Cochlear respects human rights and expects its Suppliers to aim to conduct their business in alignment with the rights and principles in the:

- International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- UN Guiding Principles on Business and Human Rights; and
- United Nations Global Compact (UNGC) and the Ten Principles.

### Free Employment

Workers must have the right to choose their employment freely, and must not be forced to remain in employment by any means. Suppliers must ensure workers receive contracts outlining key conditions of their employment, in a language they can understand, and with sufficient time for review before they are asked to accept the role. Suppliers should take steps to ensure its operations are free from slavery and human trafficking.

### Fair Pay

Workers must be paid at minimum the legally mandated wage, including all applicable overtime rates and benefits. Workers must be paid in a timely manner, and not have pay withheld as a disciplinary measure.

### Working Hours and Leave

Working hours and leave provisions must be reasonable and not contravene local labour laws.

### Respect and Fairness

Workers must always be treated with respect, and not be subject to bullying, harassment, abuse, cruelty, degrading treatment or punishment.

### Diversity & Inclusion

Cochlear expects its Suppliers to provide an inclusive workplace that is diverse and representative of the communities in which they operate. Workers should not be subject to discrimination on the basis of race, colour, religion or belief, national origin, culture, ethnicity, disability, gender, age, sexual orientation, veteran status, marital or family status, socio-economic background, family or carer's responsibilities or other legally protected classification.

### Prevention of Child Labour

Suppliers will always ensure all their workers are above the legal working age, and all full-time workers are above the age of completion of compulsory schooling.

### Freedom of Association

Workers must be afforded the right to associate with others and join or form trade unions to the extent mandated by local law.

# 3. Safety and wellbeing

### Legislative Compliance

Suppliers will be compliant with all relevant laws and regulations relating to workplace health and safety and ensure that all workers are afforded a safe working environment.

### Risk Management

Suppliers will take a risk-based approach to the identification and management of safety risks that arise from their activities, in order to minimise the risk of injury and illness. They must have a system to record, monitor and manage health and safety risks and incidents that is aligned to the organisation's risk profile as well as applicable laws and standards. Suppliers must have a safety system that ensures management responsibility and continual improvement.

### Training, Consultation and Safe Systems of Work

Suppliers will ensure the provision of safe systems of work and provide workers and contractors with adequate training and instruction to undertake their role safely. Workers should be consulted regarding workplace health and safety.

### Equipment, Resources and Personal Protective Equipment

Suppliers will ensure that they provide workers with all appropriate safety equipment, resources and personal protective equipment to enable them to perform their role safely.



#### **Incident Management, Emergency Preparedness and Provision of First Aid**

Suppliers will ensure they have in place systems, training and equipment to respond to, report and manage workplace incidents, injuries and emergencies. Workers must have access to unobstructed emergency exits, first aid facilities and treatment for work-related illness and injury.

#### **Amenities and Wellbeing**

Suppliers will ensure employer-provided facilities, amenities and accommodation for workers are clean, safe and secure, with access to clean water and good-quality air.

### **4. Environmental sustainability**

#### **Legislative Compliance**

Suppliers will comply with all applicable national, state, regional and local government environmental legislation and licensing requirements.

#### **Prevention of Pollution**

Suppliers will minimise the risks of pollution from their operations, including air emissions and pollution via wastewater, groundwater or stormwater, and ensure the safe use, storage, transport, and disposal of hazardous chemicals.

#### **Sustainability Improvements**

Suppliers will use water, energy and other natural resources in way that is responsible, take steps to reduce its carbon footprint and seek to reduce waste going to landfill.

## **5. Ethical trading**

#### **Avoiding Conflicts of Interest and Bribery**

Suppliers must avoid or declare any actual, perceived or potential conflict of interest, comply with all anti-bribery and corruption laws, and not offer or accept inappropriate or expensive gifts or hospitality. Please note that Cochlear representatives are required to comply with Cochlear's internal policies which govern and limit the provision of gifts to, and receipt of gifts from, third parties including Suppliers.

#### **Privacy & Data Security**

Cochlear requires its Suppliers to comply with all relevant laws and regulations relating to data protection and privacy, including (i) respecting the rights of individuals (including employees), (ii) processing personal information about individuals in a transparent way and providing accurate and clear notices to individuals relating to the Supplier's data privacy practices, (iii) implementing adequate technical and organisational measures to ensure the confidentiality, availability, privacy, security and integrity of data, and (iv) using data and technology in an ethical manner to avoid discrimination, exploitation or harm and in a socially responsible manner to minimise risks to individuals.

#### **Confidentiality**

Supplier must protect and keep confidential any proprietary and confidential information that Cochlear has provided and must not disclose any such proprietary or confidential information to third parties without prior written consent of Cochlear. Any use, disclosure and handling of Cochlear's proprietary or confidential information must be undertaken in accordance with any applicable agreements. Cochlear does not allow Suppliers to use Cochlear's name or logo in any public display or document (including at trade shows or on websites) without Cochlear's prior written approval.

## Competition and Consumer Laws

Suppliers must comply with all applicable laws relating to competition, anti-trust and consumer protection that apply to them. Suppliers must not engage in any misleading or deceptive conduct or engage in conduct that is anti-competitive in its supply chain or as part of its sales and marketing activities.

## Avoiding Contributing to Warfare and Criminal Groups

Suppliers will comply with all applicable trade sanctions. Suppliers must implement measures to ensure they do not purchase goods or services from or support groups which may directly or indirectly fund or support criminal activity, unlawful violence, exploitation or terrorist groups.

## Conflict Minerals

Where applicable, Cochlear requires Suppliers to comply with the Dodd-Frank Act with respect to the sourcing of tin, tungsten, tantalum and gold used in their products and take adequate measures and controls to identify and take steps to eliminate the use of any conflict minerals in their supply chain.

## Supplier Due Diligence

Suppliers will carry out proactive measures to ensure that their suppliers, partners and distributors comply with all labour rights, safety, environmental sustainability, and ethical trading requirements described in this Code.

# 6. Audit and assurance processes

## Internal Audit

Suppliers are required to carry out their own inspections and internal audits to ensure implementation of their own policies and procedures that reflect the principles of this Code.

## Corrective Action Process

Suppliers are required to have a robust corrective action process to drive improvement in safety, sustainability, labour standards and ethical trading principles. If a Supplier is found to be in breach of this Code, the Supplier will be required to implement the necessary changes in accordance with the relevant corrective action plan.

## Provision of Information

Suppliers must notify Cochlear if they do not meet all the requirements of this Code. Suppliers may be required to provide information or documentation related to items in this Code. Suppliers must permit Cochlear or a delegate to conduct on-site audits, with reasonable notice, to verify the Supplier's compliance with the requirements of this Code.

# 7. Consequences of non-compliance with the code

Cochlear will work closely with Suppliers, as appropriate, by providing guidance and support to ensure that Suppliers are aligned to the principles and expectations set out in this Code. Non-compliance of a serious nature or repeated breaches of the Code may result in Cochlear taking further action including but not limited to terminating the supply relationship with the Supplier.

# 8. Applicable laws and regulations

Where there is a conflict between this Code and a more restrictive applicable law or regulation, that applicable law or regulation shall prevail.

# 9. Cochlear whistleblower service

Current and former Suppliers and employees of Suppliers are Eligible Protected Persons under the Cochlear Whistleblower Protection Policy and are able to report any suspected or actual breaches of the Supplier Code of Conduct anonymously (subject to local laws and regulations) and confidentially using the [Cochlear Whistleblower Service](#). Please refer to [Cochlear's Whistleblower Protection Policy](#) for more details.

Where applicable, Suppliers are required to comply with all relevant whistleblower protection laws and regulations and have in place appropriate policies, procedures or other whistleblower protection measures that may be required under those laws and regulations.

# Hear now. And always

Cochlear is dedicated to helping people with moderate to profound hearing loss experience a world full of hearing. As the global leader in implantable hearing solutions, we have provided more than 700,000 devices and helped people of all ages to hear and connect with life's opportunities.

We aim to give people the best lifelong hearing experience and access to next generation technologies. We collaborate with leading clinical, research and support networks to advance hearing science and improve care.

That's why more people choose Cochlear than any other hearing implant company.

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[www.cochlear.com](http://www.cochlear.com)

Please seek advice from your health professional about treatments for hearing loss. Outcomes may vary, and your health professional will advise you about the factors which could affect your outcome. Always read the instructions for use. Not all products are available in all countries. Please contact your local Cochlear representative for product information.

ACE, Advance Off-Stylet, AOS, AutoNRT, Autosensitivity, Beam, Bring Back the Beat, Button, Carina, Cochlear, 科利耳, コクレア, 코클리어, Cochlear SoftWear, Contour, 콘트우아, Contour Advance, Custom Sound, ESPrit, Freedom, Hear now. And always, Hugfit, Hybrid, Invisible Hearing, Kanso, MET, MicroDrive, MP3000, myCochlear, mySmartSound, NRT, Nucleus, Osia, Outcome Focused Fitting, Off-Stylet, Profile, Slimline, SmartSound, Softip, SPrint, True Wireless, the elliptical logo, and Whisper are either trademarks or registered trademarks of Cochlear Limited. Ardium, Baha, Baha SoftWear, BCDrive, DermaLock, Human Design, Piezo Power, SoundArc, Vistafix, and WindShield are either trademarks or registered trademarks of Cochlear Bone Anchored Solutions AB.

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