

Our mission at Cardio Partners, Inc. (Cardio Partners) is to be The Best partner for those who save and improve patients' lives. That is why we as a company place the utmost importance in maintaining transparency and honesty in our business operations, as well as the activities of our Suppliers.

This Code of Conduct ("Code") applies to the business activities of any third party, firm, or individual that provides a product or service to Cardio Partners including suppliers, vendors, distributors, partners, and their employees, directors, officers, agents, representatives (together referred to as "Supplier" or "Suppliers"). Suppliers must meet or exceed the subsequent standards, laws, regulations, and basic conditions put forth in this Code in order to do business with Cardio Partners. Additionally, Supplier shall require its employees, vendors, contractors and other representatives to comply with this Code.

Legal/Regulatory Compliance – Suppliers must comply with, and stay abreast of, all applicable local, state, federal, national and international laws/regulations of the jurisdictions in which they are doing business, including (but not limited to) the following:

- **Antitrust Laws** – Suppliers must comply with all domestic and international antitrust and competition laws and regulations.
- **U.S. Federal Fraud and Abuse Laws** – Suppliers must comply with the U.S. Federal Fraud and Abuse laws relating to healthcare. These laws generally prevent fraudulent claims, as well as willful payments/compensation to promote patient referrals or the generation of business, for any goods and services billable to Medicare, Medicaid, or other federally funded healthcare programs. These laws also prevent physicians from referring patients for designated health services, payable by Medicare or Medicaid, from which the physician or immediate family member has a financial relationship. If Suppliers operate in foreign countries (outside of the U.S.), they should comply with all applicable fraud and abuse laws in their jurisdictions.
- **Anti-Corruption** – Suppliers must abide by the anti-corruption laws of the jurisdictions in which they are doing business, including the United States Foreign Corrupt Practices Act (FCPA). The FCPA is a U.S. federal law prohibiting payments, directly or indirectly, of bribes to foreign officials to assist in obtaining or retaining business.
- **Import/Export Laws** – Suppliers' import/export activities must comply with all appropriate trade laws in the U.S. and abroad. All products sold to Cardio Partners must comply with all applicable laws, regulations and standards. Suppliers must ensure that all product markings and documentation are accurate and that appropriate records are maintained.

Environment, Health and Safety – Suppliers must have the appropriate policies and procedures in place to protect and promote workplace safety, health and the environment.

- **Environmental Laws** – Suppliers must comply with all laws and regulations regarding the environment in their jurisdiction. All U.S. based Suppliers are required to comply with The Clean Air Act (CAA), a federal law that regulates air emissions from stationary and mobile sources.
- **Workplace Health and Safety** – Suppliers must ensure that their employees work in a safe and healthful environment. If a Supplier is located in the U.S., it must comply with all applicable OSHA standards and workplace health and safety laws and regulations. If located outside of the U.S., Supplier must comply with applicable local laws and regulations regarding workplace health and safety. Suppliers are expected to provide their new and existing workers with adequate information and instruction on health and safety concerns.

Community Involvement – Cardio Partners seeks to conduct business with Suppliers that help improve the communities in which they live and serve.

Employment Practices and Human Rights – Suppliers must abide by the following employment practices:

- **Equal Employment Opportunity Laws** – Suppliers, both foreign and domestic, must comply with all applicable employment laws and may not discriminate based on race, color, religion, sex or national origin.
- **Harsh or Inhumane Treatment** – Suppliers must not in any way support, both directly and indirectly, the use or threaten to use of any form of physical, sexual, psychological or verbal abuse, harassment or intimidation.
- **Wages and Benefits** – Wages and benefits for workers must meet or exceed industry standards and the requirements of local law.
- **Child Labor** – Suppliers must not in any way support, both directly and indirectly, the employment of an individual who is younger than what is considered the legal minimum age for employment in the appropriate locality.
- **Unpaid/ Forced Labor** – Suppliers must not support, both directly or indirectly, the use of unpaid/forced labor including (but not limited to) bonded labor and slave labor.
- **Immigration Law Compliance** – All of Supplier's employees, directors, agents, partners, subcontractors, suppliers, distributors, and representatives including (but not limited to) any third party or individual who provides a good or service to Supplier, must be legally authorized to work in the country of production under the applicable local laws. Suppliers must require and review documentation proving work authorization.

U.N. Global Compact Initiative – Cardio Partners recognizes the value of the U.N. Global Compact initiative and voluntarily complies with the corresponding Ten Principles of the Compact. Supplier is expected to be familiar with and comply with the Ten Principles.

Monitoring and Reporting of Violation - Cardio Partners retains the right to monitor Supplier's compliance to this Code and request information from its Suppliers regarding their compliance with the principles of this Code of Conduct. This may include conducting periodic site visits or audits of Supplier's facilities and/or operations. If Code violations are reported, an evaluation and investigation may be warranted by Cardio Partners.

COMPLIANCE DECLARATION

We certify:

1. That we have received and read the Cardio Partners Supplier Code of Conduct and commit ourselves to fully comply with its principles and requirements.
2. That we will effectively communicate the contents of the Code to our employees, agents, subcontractors and suppliers and will ensure all measures required are implemented accordingly.

We also confirm that we have noted that compliance to the Code is an essential prerequisite for business relations with Cardio Partners.

Name: _____

Title: _____

Company Name: _____

Company Address: _____

Date: _____

Signature: _____

The Compliance Declaration must be signed by a duly authorized representative of the company.