



# Cook Medical Holdings LLC

## 2020 Modern Slavery Statement

1 July 2019 to 30 June 2020

### About this Statement

Cook Medical Holdings (Cook Medical) prepared this Modern Slavery Act Statement (Statement) for the reporting period 1 July 2019 to 30 June 2020 and it was approved by the Board of Managers on 29 March 2021. This statement describes our structure, operations and supply chain, the risk of modern slavery in our business, actions taken to identify and mitigate the risk, how we assess the effectiveness of those actions, and the consultation process.

This Statement is a joint statement for Cook Medical Holdings and its affiliate entities:

Cook Asia Limited	Cook Medical Korea Co. Ltd
Cook Asia (Malaysia) SDN BHD	Cook Medical Nederland BV
Cook Australia Pty Ltd	Cook Medical New Zealand Limited
Cook (Canada) Inc.	Cook Medical Operations EMEA Limited
Cook Canton LLC	Cook Medical (Thailand) Co. Ltd
Cook Canton Real Estate LLC	Cook Medical Technologies LLC
Cook Capital Equipment LLC	Cook Nederland BV
Cook (China) Medical Trading Co., Ltd	Cook Pan.Pacific Pty Ltd
Cook Denmark International ApS	Cook Profile Park LLC
Cook Denmark International Holdings ApS	Cook Research Incorporated
Cook Espana, SL	Cook South East Asia Pte Ltd
Cook Europe Finance BV	Cook Sweden Holding AB
Cook France SARL	Cook Sweden Finance AB
Cook Incorporated	Cook Taiwan Ltd
Cook India Medical Devices Pvt Ltd	Cook Vandergrift Inc.
Cook Ireland Limited	Cook Property Incorporated
Cook Medical EUDC GmbH	CMI Real Estate Holdings LLC
Cook Medical Europe Limited	Muffin Incorporated
Cook Japan GK	Sabin Corporation (CPT)
Cook Medical LLC	Star Meetings and Events Asia-Pacific
Cook Medical Pty Ltd	Star Travel Agency Limited
Cook Medical Australia Pty Ltd	William A. Cook Medical Australia Pty Ltd
Cook Medical Device (Shanghai) Co. Ltd	William Cook Europe ApS
Cook Medical EMEA Group Ltd	Wilson-Cook Medical, Inc. (Cook Winston-Salem)

Throughout this statement, 'Cook Medical', 'our', 'us' and 'we' refers collectively to Cook Medical Holdings LLC and its affiliate entities.

At Cook Medical, we recognize that modern slavery involves the exploitation of victims through coercion, threats or deception depriving vulnerable workers of their freedom. As a global business with operations around the world, Cook Medical is committed to reflecting our core values in our global operations. Our Global Code of Conduct underscores our commitment to promoting dignity and basic human rights. We respect and abide by applicable employment laws where we operate, expect the same of those in our supply chain, and speak up if we see human rights issues.

## **Organizational Structure, Operations and Supply Chain**

### ***Who we are***

Cook Medical is a privately held parent of Cook Medical companies. We invent, manufacture, and deliver a unique portfolio of medical devices and is headquartered in Bloomington, Indiana, United States. Serving patients is a privilege, and we demand the highest standards of quality, ethics, and service in all that we do.

Cook Medical is built upon the foundation of the permanent, historical, and influential work in the field of minimally invasive medicine by our founders Bill and Gayle Cook. Since 1963, Cook has evolved into a thriving, global medical technology company. We provide minimally invasive medical devices and technology for nearly every area of the modern hospital, supporting almost 60 clinical specialties.

### ***Our company values***

#### **Act with integrity**

We use our high ethical standards and core values to guide our decisions and actions.

#### **Demand quality**

We hold ourselves to the highest quality standards because we know that everything we do has an impact on someone's life.

#### **Be transparent**

We are honest with each other and share information with the people who are impacted.

#### **Give back**

We believe in making our communities stronger by sharing our time, skills, and resources.

#### **Treat everyone with respect**

We respect each other and our business partners by being open to different ideas and perspectives and appreciative of each person's contributions.

#### **Solve problems together**

We approach innovation by first listening to understand and then creating a solution.

### **Continually improve**

We learn from data, experience, feedback, and each other to constantly evolve and improve how we work.

### ***Our locations***



Cook Medical has manufacturing, customer service distribution, entities, and direct sales team operations in:

Australia, Belgium, Canada, China, Denmark, Finland, France, Germany, Hong Kong, Hungary, Ireland, Italy, India, Japan, Malaysia, Singapore, South Korea, Taiwan, Thailand, United Kingdom and United States.

### ***Our operations***

Cook Medical invents, manufactures, and delivers medical devices through a global footprint of affiliates located in across the Americas, Asia-Pacific, and European regions. We employ more than 9,000 employees worldwide.

### ***Our supply chain***

During the reporting period, Cook Medical's supply chain was managed by procurement teams in the Americas, Asia-Pacific, and Europe and Middle East region. Cook Medical has strong ties to hundreds of manufacturers and service providers worldwide. We have over 2,200 direct and indirect suppliers. We have been fortunate to work with some of our suppliers for more than 35 years.

Our products are sourced from Cook Medical manufacturing sites in Australia, Denmark, Ireland, and the United States. We also procure goods and services from over 2,200 direct and indirect suppliers. Direct suppliers provide quality impacting materials, devices, packaging, freight, tools, and equipment. Indirect suppliers provide non-quality impacting IT/Telecom, office products, copiers, printers, marketing and professional services, facilities maintenance tools and equipment and travel services.

## **Risks of modern slavery risk in our operations and supply chain**

Cook Medical views the identification and elimination of modern slavery as an essential concern consistent with our core values and global standards, and subject to ongoing assessment and continuous improvement efforts. During the reporting period, no reported cases of alleged misconduct which would constitute a violation of modern slavery or human trafficking standards were received or substantiated. Cook Medical does not manufacture in any of the top ten countries identified in the Global Slavery Index as having the highest rate of slavery or the

largest numbers of enslaved persons. Our operations do not generally fall into high risk categories for modern slavery risk. However, we recognize the importance of preventing modern slavery in the supply chain and the importance of an effective modern slavery framework.

## **Our approach to modern slavery and actions taken**

### ***Core values***

Our modern slavery framework is founded upon the belief that we should reflect our core values of act with integrity, demand quality, be transparent, give back, treat everyone with respect, solve problems together and continually improve. We expect Cook Medical employees and everyone in our supply chain to reflect these values in our operations and actions.

### ***Code of Conduct***

Our Global Code of Conduct sets expectations for promoting human rights, dignity, and basic individual rights. First, it requires that Cook Medical employees respect and abide by applicable employment laws in the locations where we operate. Second, it prohibits human rights abuses and the conduct of business with those in who engage in human rights abuses. Third, the Code of Conduct requires those who see or suspect labor law or human rights violations to speak up.

### ***Supplier Code of Conduct***

During the reporting period, Cook Medical published a Supplier Code of Conduct designed to establish guidelines for supplier interactions with Cook Medical and its affiliates. Suppliers play an important part in the success of our business. We are committed to engaging in business relationships with Suppliers who are aligned with our mission and values.

The requirements outlined in the Code are designed to improve business relationships, help ensure ethical and legal compliance, foster an environment of partnership, and create value in our business interactions. Suppliers and their subcontractors must comply with the Code.

If a supplier is found to be in violation of the Code, we will take appropriate measures to address the violation. Cook Medical reserves the right to terminate its relationship with any supplier for failure to comply with the Code.

Cook Medical is committed to ensuring that its actions do not harm fundamental human rights, either directly or through its supply chain. We expect suppliers to share this commitment and provides that:

- Suppliers must not engage in any acts of human rights abuse or harsh or inhumane treatment, Suppliers must take steps to ensure that slavery and human trafficking are not taking place within its organization or supply chain.
- Suppliers must protect employees from unfair, unethical, discriminatory, and unsafe working conditions and must not engage in bonded, forced, or child labor.

- Suppliers must certify that the materials incorporated into their products comply with the laws regarding human trafficking and fundamental human rights of the country or countries in which it is doing business.
- Suppliers must ensure that regular employment is provided, living wages are paid to employees, and working hours are not excessive.

## ***Modern slavery framework***

### ***Verification***

Cook Medical suppliers are required to verify they operate in compliance with applicable laws, regulations, governmental requirements, and industry guidelines in the countries in which they operate.

### ***Certification***

Based on a risk assessment to include the material being sourced, Cook Medical may request that suppliers certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the countries in which they are doing business.

### ***Due Diligence and Supplier Screening***

At Cook Medical, we believe it is good business to know your business partners. Our goal is to manage the various risks inherent to medical device manufacturing and to help ensure compliance with global laws, regulations, and industry best practices.

We conduct restricted party screening on many of our supply chain partners. We also have a supplier screening program aimed at reducing modern slavery risk in our supply chain. During the reporting period, our Supplier Screening Program was managed by Global Risk Management Solutions (GRMS).

Over 200 Cook Medical suppliers were subject to the GRMS Supplier Screening Program designed to mitigate risk of modern slavery. Cook Medical third parties involved in the distribution of our products were subject to due diligence screening and monitoring conducted internally and with the assistance of a third-party compliance service provider.

### ***Reporting, Grievance mechanism and Non-Retaliation***

Our Global Code of Conduct and Supplier Code of Conduct require reporting of violations or potential violations to Cook Medical directly via our Global Ethics & Compliance Helpline. Our Ethics & Compliance Helpline provides an independent, confidential, and multilingual grievance mechanism to our employees, distributors, and suppliers worldwide. Cook Medical has a non-retaliation policy to protect those who report a concern in good faith.

### ***Investigation, Response and Remediation***

Reports of misconduct and non-compliance, received directly, through our due diligence and screening, through our Ethics & Compliance Helpline or any other indirect source are assessed

and, if necessary, investigated. Our goal is to conduct fair, prompt, and thorough investigations aimed at determining the truth of allegations.

Investigations may be conducted by Cook Medical investigators or external investigators engaged on our behalf. We believe in objective, impartial investigations that respect confidentiality, privacy, and local law requirements. We prohibit retaliation against good faith reporters and participants in our investigations.

Where necessary, we conduct follow-up to help ensure accountability, root cause analysis and proper remediation.

### ***Internal Accountability***

Cook Medical employees who violate our Global Code of Conduct may be subject to disciplinary action, up to and including termination, as described in our Employee Manual.

Suppliers who violate our Supplier Code of Conduct are subject to corrective action or termination of the supplier partnership, depending on the number and severity of noncompliance identified. We work with suppliers to help ensure corrective action plans resolve instances of noncompliance, when appropriate.

### ***Training***

Cook Medical employees receive annual training on the Code of Conduct. During the reporting period, Cook Medical hosted training for 65 strategic suppliers to review expectations and improve engagement on compliance issues, including human rights. Cook Medical also delivered human rights training to third party distributors during the reporting period.

## ***Assessing effectiveness***

Our approach to modern slavery is an ongoing and evolving process and continuous improvement is a foundational element. We will review and assess the effectiveness of our actions through:

### ***Governance***

Our Board is responsible for the oversight of the operation of the Ethics and Compliance Program. To fulfill this duty, the Board has established the Board Oversight Committee (BOC) to oversee the global compliance efforts of Cook.

The BOC is authorized by the Board to take necessary steps to help ensure that Cook continues to meet its compliance obligations and receives updates on compliance risks, including modern slavery, and the actions taken to mitigate those risks.

### ***Risk assessment***

We will conduct periodic risk assessments of our operations and our suppliers to address modern slavery concerns.

### ***Monitoring and Auditing***

We will review and improve controls aimed at mitigating modern slavery risk within our operations and our supply chain. We will include a review of those controls in future internal and supplier audits.

### ***Grievance Mechanism***

We will monitor and review reports of modern slavery complaints and grievances through direct reporting and our Ethics & Compliance Helpline.

### ***Investigation and Remediation***

We will conduct fair, prompt, and thorough investigations of modern slavery complaints and grievances. We will also follow-up our investigations where necessary to help ensure accountability, root cause analysis and proper remediation.

### ***Ongoing improvement***

We will review evolving modern slavery developments, risks and requirements and our efforts to improve our modern slavery framework.

### ***Consultation Process***

Cook Medical operates and is managed by policies, systems and processes that apply consistently to Cook Medical affiliate entities.

Our consultation process included engagement with our Human Rights Working Group, created to address human rights, modern slavery, fair labour standards, and conflict minerals. The working group includes representatives from Ethics & Compliance, Legal, Global Procurement and Supply Chain in consultation with Finance, Human Resources, Corporate Social Responsibility, and an external third-party modern slavery subject matter expert.



Pete Yonkman  
President, Cook Medical Holdings