

ZOLL

Policy re: California Senate Bill 657, the California Transparency in Supply Chains Act of 2010

ZOLL is committed to producing the highest quality medical devices and to maintaining its reputation for excellence through customer-focused quality. We believe that long-term, trusting business relationships are built upon honesty, openness and fairness. ZOLL considers its suppliers, distributors and consultants to be an integral part of our company and as such we expect them to adhere to the principles of ZOLL's Code of Conduct in the course of their work on behalf of ZOLL. Suppliers, distributors and consultants wishing to transact business with ZOLL must have a good reputation for quality and honesty in the business community.

ZOLL is committed to conducting business in a socially responsible manner. This includes the recognition that we have a responsibility towards ensuring that slavery and human trafficking do not occur in our supply chain. We seek to operate in compliance with all applicable laws and regulations wherever we do business, and to respect and support international principles aimed at preventing and eradicating human trafficking and slavery, as described in the 2000 United Nations "Palermo Protocol" and the 1926 Slavery Convention. ZOLL's suppliers, distributors or consultants should be aware that illegal or unethical activity will not be tolerated and may result in termination of the business relationship.

With respect to compliance with the California Transparency in Supply Chains Act of 2010, please note:

1. In connection with appointing new vendors and in performing regular vendor audits ZOLL verifies product supply chain compliance with this Act, including reviewing risks of human trafficking and slavery. These procedures are performed by ZOLL employees;
2. ZOLL conducts audits of suppliers to evaluate supplier compliance with our policy for trafficking and slavery in supply chains. These audits are performed by ZOLL employees and may be unannounced;
3. In connection with the audits of direct suppliers, ZOLL requires direct suppliers to certify that they are in compliance with the Act and that they agree to comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business; ZOLL requires all new direct suppliers to certify that they are in compliance with the Act and that they agree to comply with the

laws regarding slavery and human trafficking of the country or countries in which they are doing business;

4. ZOLL maintains internal accountability standards and procedures for employees and contractors failing to meet any company standards regarding slavery and trafficking; and
5. ZOLL provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to managing risks within the supply chain of products.

For more information, please contact ZOLL directly via email at info@zoll.com.