

January 2024



**OSI** SYSTEMS, INC.

# Code of Conduct

## for Suppliers

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Creating Solutions for a Safer  
and Healthier World. **Together.**

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[osi-systems.com](http://osi-systems.com)

# Our Mission and Values

OSI Systems develops innovative products and solutions that create customer value, demonstrates operational excellence by ensuring industry leading product performance, and seeks to create a work environment of trust and respect that recognizes and rewards job performance.

## Our Values



**Innovation**



**Integrity**



**Accountability**



**Teamwork**

# A Message from our CEO

Dear Suppliers and Vendors,

Our company's success is driven by our commitment to integrity and our passion for providing our customers with innovative products.

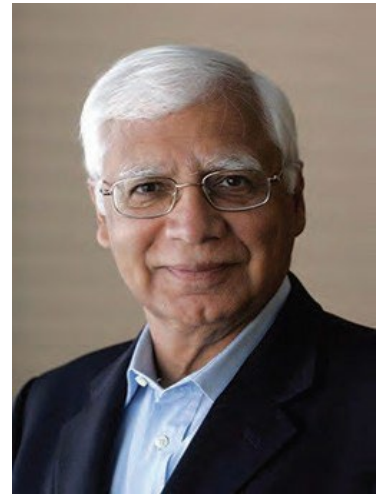
To maintain our reputation, we must have a world-class supply chain that holds itself to the highest standards. Our expectation of excellence applies not only to our employees, but also extends to our suppliers and vendors as well as their employees.

OSI's Supplier Code Conduct is designed to help us conduct our business in accordance with our stringent expectations for ethical behavior and standards. As our supplier, we expect you to implement management systems that ensure compliance with this Code and applicable laws, mitigate related operational risks, and facilitate continuous improvement.

Thank you for contributing to our legacy of integrity and performance.

To our future success,

Deepak Chopra



Deepak Chopra  
Chairman, President, and CEO

# Compliance with Laws, Rules, and Regulations

***As our valued supplier, you are expected to comply with all applicable laws and regulations in the jurisdictions in which you operate. In addition, you are expected to comply with the principles and provisions in this Code.***

## **Labor and Human Rights**

As stipulated in our procurement terms and conditions, suppliers must respect the protection of international human rights and anti-slavery laws and ensure that they are not complicit in human rights abuses. Suppliers are expected to adhere to the “UN Guiding Principles on Business and Human Rights” and “ILO Declaration on Fundamental Principles and Rights at Work.” Failure to comply with these may result in termination of our business relationship.

### **Child Labor & Forced Labor**

OSI is committed to protecting children and young workers from being exploited. Suppliers shall not use child labor or any young workers below the age of 16. Suppliers are prohibited in engaging in forced labor.

### **Discrimination & Harassment**

OSI is committed to promoting equal employment opportunity for everyone. Suppliers must make all employment decisions based on job-related qualifications without regard to race, color, gender, sexual orientation, religion, national origin, age, marital status, physical or mental disability, or veteran status.

We believe in treating each other with dignity and respect. Suppliers must provide a workplace free of harsh or inhumane treatment or harassment.

## **Wages Benefits & Working Hours**

Suppliers must pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with the worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

### **Freedom of Association & Collective Bargaining**

OSI believes in the benefit that open communication and direct engagement with workers (and/or designated union officials, if applicable) to resolve workplace and compensation issues can bring to both a business and its employees. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers’ councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

### **Human Trafficking**

OSI will not work with any third party who is involved with the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion or abduction. Suppliers must comply with our [Modern Slavery and Human Trafficking Policy Statement](#).

# Compliance with Laws, Rules, and Regulations

## **Bribery & Corruption**

Suppliers must not engage in or allow any form of bribery, corruption, or fraud. In addition, we expect that suppliers comply with the U.S. Foreign Corrupt Practices Act, the U.K Bribery Act, and other applicable anti-bribery laws and regulations. Our policies prohibit offering, promising, or giving anything of value corruptly in order to gain or retain an unfair business advantage. Our supplier terms and conditions contain audit provisions which help OSI enforce these policies.

## **Trade Compliance, Anti-Boycott, Sanctions, & Export Control**

Each supplier must ensure that its business practices are consistent with international sanctions and anti-boycott regulations and laws. In addition, we expect suppliers to comply with applicable export control laws and directions from OSI regarding the export, re-export, transfer, or importation of our products, parts, information, and data. Failure to comply with these policies may result in the termination of our business relationship.

## **Insider Trading**

OSI is a publicly traded company. Suppliers must comply with all applicable securities regulations and are prohibited from trading in OSI's securities when in possession of material non-public information about OSI.

## **Conflict Minerals**

We expect each supplier to conduct reasonable inquiries into its supply chain such that it may properly identify if any part or product sold to OSI contains "conflict minerals." These minerals include cassiterite, columbite-tantalite, gold, and wolframite (including derivatives such as tantalum, tin, and tungsten). Suppliers are required to respond to OSI's surveys about the contents and origin of items supplied to our Company.

## **Counterfeit Parts**

Each supplier is expected to maintain strong policies, processes, and procedures within its own suppliers to ensure that counterfeit, tampered, and alternate parts do not enter its supply chain.

## **Data Protection**

OSI expects suppliers to process personal data and corporate information in accordance with its contractual obligations, as well as in compliance with international data privacy laws (including the California Privacy Rights Act and the General Data Protection Regulation).

## **Occupational Health & Safety**

Each supplier must provide a safe and healthy work environment which complies with applicable laws, regulations, and occupational health and safety standards.

We expect suppliers to maintain robust Health and Safety Management Systems that are consistent with internationally recognized standards (e.g. ISO 45001

# Sustainability and Environmental Protection

*OSI recognizes the importance of preserving natural resources for future generations while making the most efficient use of those resources as we grow as a company. Our suppliers play a critical role in helping us achieve our environmental, social, and sustainability goals.*

## **Sustainability & Environmental Policies**

Our robust sustainability program requires Suppliers to share in our commitment to reducing the environmental footprint of our operations and our products. Suppliers are expected to comply with applicable environmental regulations by obtaining all necessary environmental permits, licenses, or other relevant authorizations, and partner with OSI in reducing GHG emissions in the production and delivery of goods and services throughout the supply chain.

## **Sustainability & Climate Risk Assessments**

As part of our global sustainability program, OSI evaluates the impact of our environmental footprint, including the impacts of our supply chain. We expect each supplier to participate in inquiries about its environmental footprint and sustainability practices.

## **Supplier Audits**

OSI reserves the right to conduct audits of suppliers to ensure that suppliers meet contractual and policy commitments regarding sustainability and environmental stewardship.

## **Supply Chain Impact**

In addition to evaluating the impact of our operations, OSI considers the environmental impact of the products and services we offer to customers. Our suppliers play a key role in these assessments and are expected to meet applicable contractual commitments.

# Speak Up!

We are committed to operating according to the highest ethical standards. We expect our suppliers to “Speak Up” by reporting any instances where you see or suspect a breach of this Code or have concerns about the way in which we’re doing business. You can contact us directly at [compliance@osi-systems.com](mailto:compliance@osi-systems.com).



If, for any reason, you would like to report a concern anonymously, we encourage you to utilize the OSI Ethics Hotline. We contract with a third-party, EthicsPoint, to host and administer our Ethics Hotline. All reports are kept confidential and are immediately reviewed by senior management.

Visit <https://osi.ethicspoint.com> to make a report.

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**OSI Systems, Inc.**

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