



Responsible Supply Chain

At Edwards, we value our relationships with our suppliers. We are committed to conducting business only with suppliers who:

- do not engage in human trafficking or modern slavery,
- adhere to ethical business practices,
- act in an environmentally responsible manner,
- encourage workplace health and safety, adopt good human resources policies and practices, and
- abide by all applicable laws.

We regularly perform a variety of actions and activities to ensure that the suppliers providing materials to Edwards meet this commitment.

SUPPLIER ASSESSMENTS AND QUALIFICATIONS

At Edwards, we have assessed our supplier base risk profile, which indicated a low risk of modern slavery in our supply chains. Due to the highly regulated medical device industry that affects the products and components we purchase for our medical devices, we typically aim to avoid adding new suppliers unless necessary and minimize sourcing from less developed regions of the world, which further reduces this risk.

Prior to engaging a new supplier, Edwards typically evaluates the supplier through a risk-based assessment process. In 2017, we began using a third-party tool to carry out additional due diligence on potential new direct materials suppliers (“Third-Party Monitoring Service”). This helped improve the rigor of our onboarding process, which may include a supplier questionnaire and an audit of their facilities, quality systems, and business practices, and subsequently may include follow-up visits and reviews. We specifically ask new suppliers to respond to a questionnaire regarding their sustainability and compliance practices.

SUPPLIER PERFORMANCE REVIEW

Edwards is committed to continuous improvement in our supply chain. To that end, we periodically monitor the business performance of our strategic and key suppliers through periodic performance and objectives discussions and reviews. If we discover that a supplier has breached or potentially breached our standards, we ensure that appropriate remedial action is taken (which could include terminating our relationship with that supplier given the severity level). No specific risks or incidents of human trafficking or modern slavery were identified for any supplier during 2019.



SUPPLIER AUDITS

Edwards periodically audits suppliers to confirm compliance with performance and quality standards. Verifications and factory audits may be performed directly by Edwards or by third parties. Audits are typically pre-planned events with the supplier. Our audits verify suppliers' compliance with our written agreements and quality systems requirements. Audit findings and recommendations are discussed with each supplier's facility management. The supplier is expected to address all issues arising from the audit and Edwards validates the supplier's corrective actions during follow-up audits or reviews.

SUPPLIER AGREEMENTS

Edwards generally has supply contracts, quality agreements, and/or purchase order terms and conditions with its suppliers. These documents include the supplier's agreement to comply with all laws applicable to the supply of services or materials to Edwards.

EMPLOYEE TRAINING AND COMPLIANCE

All Edwards, employees are required to comply with Edwards' written Global Business Practice Standards, which comprises our code of conduct. These Standards include Edward's commitment not to produce or manufacture goods using forced or sweatshop labor, or indentured child labor. Our employees participate in periodic training on the Global Business Practice Standards to enhance understanding and compliance with these Standards. In addition, we audit compliance with the Global Business Practice Standards, investigate potential violations and, when appropriate, take remedial and/or disciplinary action.

Edwards has educated our key supply chain personnel on the detection and prevention of modern slavery. We also inform our supply chain managers how they can further promote the objectives of anti-slavery laws with our suppliers and be more conscious of working conditions at supplier's facilities.

Edwards is committed to ensuring that our supply chain partners are good corporate citizens, deal fairly in business matters, behave ethically, support a safe and healthy workplace, act in an environmentally responsible manner, and comply with applicable laws. We regularly undertake numerous activities, including the activities described above, to satisfy ourselves and others that the products and services provided to Edwards meet this commitment.



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

The California Transparency in Supply Chains Act of 2010 requires many manufacturers, including Edwards, to disclose their activities in monitoring their supply chains to prevent human trafficking and slavery. These disclosures are intended to allow businesses and consumers to make more informed decisions about the products they choose to purchase and the companies they choose to support.

MODERN SLAVERY ACT 2015

The United Kingdom's Modern Slavery Act 2015 (the MSA) requires certain organizations to disclose the steps they have taken to ensure there is no modern slavery in their own business or supply chains. This document serves as this disclosure for our subsidiary, Edwards Lifesciences Limited, for the fiscal year ended December 31, 2019, and was approved by its board of directors. The company relies on Edwards' group supply chains and as such benefits from the group policies and initiatives described in this document, which reduce the risks of modern slavery in its own operations and its supply chains. We refer also to the further detail provided on our website and in particular in our current [Sustainability Report](#), our [Conflict Minerals Report](#), and more generally on the [Corporate Responsibility](#) pages of our website.