

**TREACE**<sup>®</sup>  
*A Step Ahead.*<sup>™</sup>

**TREACE**

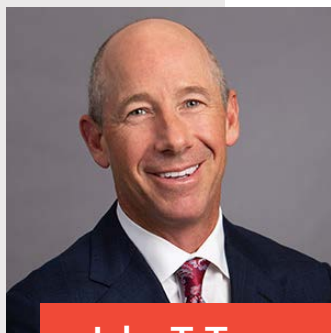
## SUPPLIER CODE OF CONDUCT

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# A Message From Our CEO



**John T. Treace**  
CEO, Founder, and Board Chair

At Treace, our customers and their patients are at the center of everything we do. Our mission advance the standard of care for the surgical management of bunions and related midfoot deformities. In order to fulfill our mission, we must give the best of ourselves every single day – without compromise – to help surgeons and customers improve patient outcomes, reduce healthcare costs, and provide an inspiring and rewarding experience for our employees and stakeholders.

We believe that a culture of integrity and compliance is critically important to fulfilling our mission. We live by our four core values of Integrity, Courage, Excellence and Collaboration and expect our suppliers to do the same.

**Integrity** means that we are honest and always do the right thing for our customers, employees and stockholders.

**Courage** means that we take accountability and avoid surprises – that we tell the bad news first, not last.

**Excellence** means that we have a passion for what we do, that we realize that medical learning is at the heart of what we do, that we have a sense of urgency to win every day and that we seek to create true value – not through paper or gimmicks.

**Collaboration** means that we enlist the willing cooperation of others, that we surround ourselves with high performers, that we maintain an employee-friendly environment and that we have fun doing our job!

Our suppliers play a crucial role in our success. We have developed this Supplier Code of Conduct to help you better understand our commitment to ethics and compliance within our supply chain, and our expectations of you as our supplier.

In addition to providing quality products and services, we expect our suppliers to operate their business in a way that supports our commitment to lawful conduct and upholding our high ethical standards. Thank you for working in line with our Supplier Code of Conduct. We value your collaboration with us and your commitment to doing business the right way, in alignment with our approach to ethics and compliance, as we work together to advance the standard of care for the surgical management of bunions and related midfoot deformities.

## Suppliers are Accountable for Acting Ethically and with Integrity



### Integrity

We are honest and always do the right thing for our customers, employees and stockholders. At Treace, we act with integrity in everything we do, and our Core Values guide us in making the right decisions ethically, thoughtfully, and responsibly so that we can appropriately meet the needs of patients, customers, employees and stockholders. We expect Suppliers to live by these Core Values too.

In order to fulfill our mission to advance the standard of care for the surgical management of bunion and related midfoot deformities, we have established clear expectations regarding how we will achieve those goals. The “how” is represented by our four Core Values of **Integrity, Courage, Excellence** and **Collaboration**, which define our culture here at Treace.

We believe that a strong culture of integrity and compliance is critically important to building a world-class business.

This Supplier Code of Conduct (this “Supplier Code”) is based on Treace’s core values and applies to all the organizations that supply us with goods and services as well as their employees, contractors, agents, suppliers, and others working on their behalf worldwide (collectively referred to in this Supplier Code as “Suppliers” or “you” or “your”).

Treace operates in a highly regulated environment. We expect our Suppliers to adhere to applicable laws, rules and regulations and this Supplier Code as well as the Supplier’s own code of business conduct and compliance policies.

This Supplier Code is not intended to replace the Suppliers’ existing policies and procedures. However, our Suppliers are expected to have appropriate policies and procedures in place that are, at a minimum, consistent with the principles in this Supplier Code, enabling our Suppliers to fully comply.

In addition, our Supplier’s policies, and procedures (including their own code of business conduct) should be supported by other guidance and training materials. Suppliers are responsible for ensuring that they and their employees, contractors and representatives comply with this Supplier Code and applicable law.

If a Supplier’s employee violates this Supplier Code or the Supplier’s own code of business conduct, we expect the Supplier to take appropriate disciplinary action with respect to that employee.

When making sourcing decisions, adherence to the requirements set forth in this Supplier Code will be considered. We reserve the right to exercise all available remedies, including suspending or ending a business relationship with any Supplier if any of its officers, directors or employees are found to have behaved in a manner that is unlawful or in violation of this Supplier Code. Furthermore, certain violations of this Supplier Code may have additional consequences, such as fines, criminal prosecution, and civil and criminal penalties.



# If We See Something, We Say Something

## Courage

We take accountability and avoid surprises – we tell the bad news first, not last.



### Speaking up requires Courage.

At Treace, we encourage our Suppliers to act with **courage**.

This includes speaking up when Suppliers have questions or concerns. Speaking up helps us learn about issues and manage risks before they become problems.

- **Speak up if you have an idea.**
- **Speak up if you have a question.**
- **Speak up if you have a concern.**

Our Suppliers should encourage reporting, without fear of retaliation, hazard, concern or injury.

If there is a suspected or actual breach of this Supplier Code or Supplier's own code of business conduct, Suppliers must expect and encourage their employees to promptly report it to management. Any Supplier employee reporting such information through appropriate channels should not face any adverse or unfavorable treatment from Supplier as a result.

Retaliation is adverse action that can take various forms, including unfavorable work assignments, unfavorable performance reviews, threats, harassment, demotion, suspension, reduced compensation, denial of benefits, or termination, among others.

We also expect our Suppliers and their employees to report any actions by a Treace employee that they believe is inconsistent with the principles in this Supplier Code.

### Our Commitment to COURAGE

- We encourage reporting by fostering an open dialog with Suppliers.
- Report concerns or ideas to your Treace contact or [compliance@treace.net](mailto:compliance@treace.net).



Nothing in this Supplier Code will impair Supplier's status as an independent contractor. Supplier retains the authority and control to determine the manner in which it provides its products and services.



# We Raise Concerns

## We value, respect, and review all reports.

If Suppliers or their personnel suspect potential misconduct, report it to Supplier's management and if it involves Supplier's relationship or work for Treace, report it to Treace also. Potential misconduct includes failing to follow laws, regulations or policies, or failing to adhere to this Supplier Code. Suppliers can raise concerns with their Treace contact, with our Chief Ethics and Compliance Officer at [compliance@treace.net](mailto:compliance@treace.net) or make an anonymous report through our hotline listed below.

All reports of misconduct to Treace are taken seriously. Each report is reviewed to confirm whether further investigation is warranted and to determine the appropriate response.

We strive to investigate each case with impartiality, competence, honesty, fairness, timeliness, thoroughness, and, to the extent possible, confidentiality. We respect the rights of all parties involved in potential misconduct and will handle all reports with discretion. No one is ever presumed to be guilty. When deemed appropriate, based on legal restrictions and relevant factors, we will share with Suppliers whether reported issue required an investigation and whether it was resolved. We expect Suppliers to handle reports of misconduct in the same manner.

- Your voice matters.
- We take your concerns very seriously.
- If any Supplier personnel has a concern or if a violation has occurred or is suspected, we encourage the Supplier personnel to speak directly to their Treace contact, but they may also contact our Compliance & Ethics Officer at [compliance@treace.net](mailto:compliance@treace.net).

Report on an anonymous basis to our hotline: [www.lighthouse-services.com/treace](http://www.lighthouse-services.com/treace) or call (855) 222-0766.



## Excellence

- We have a passion for what we do.
- We realize that medical learning is the heart of what we do.
- We have a sense of urgency to win every day.
- We seek to create true value – not through paper or gimmicks.

### Interactions With Healthcare Professionals and Customers

We interact with Healthcare Professionals (“HCPs”) and other customers in many ways, including through consulting, research and development, market access, educational, and promotional activities.

We are committed to the highest standards of excellence, and we act with integrity and transparency in our relationships with HCPs.

### The AdvaMed Code

We endorse and abide by the Advanced Medical Technology Association’s current Code of Ethics on Interactions with HCPs, which can be found online at: [AdvaMed Code of Ethics](#).

AdvaMed is a trade association that represents companies that develop, produce, manufacture, and market medical products, technologies and related services and therapies, and has developed the AdvaMed Code to ensure that interactions between medical device manufacturers and HCPs (as defined in the AdvaMed Code) are appropriate and meet high ethical standards. As a medical device manufacturer, we designed our compliance program to substantially comply with the standards set forth in the AdvaMed Code.

If Supplier has interactions with HCPs on Treace’s behalf, we expect Suppliers to make sure that all such interactions are compliant the applicable principles of the AdvaMed Code.

### The Anti-Kickback Statute

The Anti-Kickback Statute is a federal criminal law that makes it illegal to offer kickbacks or bribes to HCPs. It prohibits Treace from offering or paying anything of value (including but not limited to money) to induce the referral of business to Treace or to reward a customer for prior business. Violation of the Anti-Kickback Statute is a felony and may result in substantial penalties, fines, and potential imprisonment.

Certain states have enacted similar laws regarding interactions with HCPs, including laws that apply regardless of the source of payment for the product. Some states place further limitations on what can be provided to HCPs, including more limitations on meals and other items of value.

Suppliers must comply with the Anti-Kickback Statute and similar state laws and not expose Treace to liability under these laws.

In addition, Suppliers who interact on Treace’s behalf with HCPs or customers who purchase Treace’s health care products must conduct themselves in an appropriate manner to ensure that:

- Medical decision-making is driven by clinical concerns rather than financial incentives offered by industry.
- Products are not promoted for unapproved uses.
- Customers are provided appropriate pricing and discount information so that they can properly report costs to the government.



The definition of “healthcare professional” includes physicians, nurses, pharmacists, and any others who administer, prescribe, purchase, recommend, or are in a position to influence the use of our products.

# With Our Products and Product Development

## Product Quality and Product Development

We are committed to designing products that are safe, effective and high quality. In developing and offering our products, we will comply with standards that meet regulations promulgated by the U.S. Food and Drug Administration. In offering our products, we also comply with all applicable laws, including those relating to the environment and occupational health and safety. We expect our Suppliers to share this commitment to safe, effective, high quality products and compliance with all applicable laws.

## Manufacturing and Supply Quality

Our customers and their patients rely on our products to enhance the quality of their lives. This can only happen if our products are of high quality, safe, and effective. We are committed to ensuring that our products are manufactured and supplied to high standards of quality, safety, and efficacy, assured through deployment of robust quality management systems and our focus on the integrity of data by our suppliers. Our Suppliers are expected to work with us to meet the expectations of our customers, and to ensure value and timeliness throughout the supply chain. Our suppliers are expected to:

- Ensure their work product meets applicable quality standards and establish quality assurance processes to identify defects and implement corrective actions;
- Facilitate the delivery of products or services whose quality meets or exceeds the contract requirements;
- Develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing nonconforming parts and materials into deliverable products;
- Put in place effective processes to detect counterfeit parts and materials, provide notification to recipients of nonconforming products when warranted, and exclude them from the delivered product.

## Product Experience Reporting

We are committed to providing products that are safe, effective, and high quality. That is why we all share responsibility for reporting safety, quality, and performance issues concerning our products, no matter how we learned of the issue. If you become aware of an adverse event (including injuries resulting from user error), malfunctions or allegations involving potential problems with Treace's products or other issue with any of Treace's products, please make a product experience report promptly after receiving the information to the Product Experience Team: [pe@treace.net](mailto:pe@treace.net).



## Our Commitment to Excellence

- We conduct manufacturing operations in compliance with applicable laws, rules, regulatory requirements, good manufacturing practices (GMP), and our internal rigorous quality standards.
- We require that suppliers and partners operate in compliance with applicable laws, rules, regulatory requirements and GMP standards, and we conduct audits and oversight of our supply chain to ensure the quality, safety, and efficacy of our products.

## Confidential Information

Our Suppliers must respect, safeguard, and treat our property in accordance with agreed terms and the law. This includes physical property, hardware, software and other information technology equipment, communication resources, technology, intellectual property, confidential information, data and any other tangible or intangible assets received from Treace, our customers, suppliers, and other parties.

Our Suppliers must protect our confidential and proprietary information, including confidential and proprietary information of others, from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures. Any transfer of technology and know-how must be done in accordance and compliance with applicable laws and in a manner that protects intellectual property rights.

Our Suppliers must establish and follow appropriate security measures when providing their products and services to ensure that there is no unauthorized access to information systems and prevent unauthorized loss of, or access to, resources and data stored in those systems. Suppliers must comply with any confidentiality agreement signed with Treace.

## Respect Privacy

Our Suppliers must respect and protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Our Suppliers must comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Suppliers must only collect and use personal data for lawful and appropriate purposes, and with the individual's consent. Where personal data is transferred to a third-party service provider, our Suppliers must ensure that the third party only uses the information for the lawful purposes for which it was supplied and maintains the necessary controls to secure personal data. Suppliers must promptly notify Treace if they are aware that Treace confidential information has been improperly accessed.



✓ Supplier must take appropriate precautions to protect Supplier's devices and data that access Treace information or assets. Use system locks, inactivity screen and other precautions, particularly if you work in an open space environment. Do not leave your devices unattended in any location where security is not reasonably assured. In public settings, ensure that sensitive information cannot be viewed or overheard by others.

✓ Supplier must protect Treace information and operations from misuse, data breaches, and other security threats, which can have serious negative consequences to Supplier, Treace and their employees, and customers. Supplier should use, in accordance with applicable law, a variety of tools and processes to monitor and assess the use of, and help protect, confidential information systems and data.

## Intellectual Property

Protecting Treace's intellectual property is essential to maintaining its competitive advantage.

Suppliers may have access to highly sensitive, proprietary Treace information, such as product specifications and drawings, that should be held in strict confidence.

We support the establishment, protection, maintenance, and defense of Treace's intellectual property rights and use those rights in a responsible way. We also respect the intellectual property of others. We expect Suppliers to respect and safeguard Treace's intellectual property rights and comply with contractual and other applicable obligations regarding Treace's intellectual property.

Intellectual property includes patents, trademarks, trade dress, trade secrets, and copyrights, as well as scientific and technical knowledge, know-how and experience.



Trademark

# In Following the **Letter and Spirit of the Law**

The medical device industry is subject to many rules and regulations designed to protect patients and consumers, improve the quality of medical devices and healthcare services, and help eliminate fraud and improper influence on medical judgment.

We demonstrate our commitment to Excellence by following all laws and regulatory requirements governing our activities, including in the development, manufacturing, distribution, marketing, government contracting, sale, and promotion of our products. We expect our Suppliers to do the same.

We conduct our business in a transparent and ethical manner. Treace prohibits all forms of bribery and corruption, whether by colleagues or our business partners.

Suppliers must never offer, promise, authorize, or provide a payment or benefit on behalf of Treace that is intended to improperly influence a government official, healthcare professional, or any other person, including commercial entities and individuals, in exercising their responsibilities.

Particularly in dealings with healthcare professionals employed by or affiliated with government or regulatory authorities on behalf of Treace, Suppliers must be careful to ensure that such dealings comply with all applicable laws, regulations, professional requirements and industry codes of conduct or practice, including local transparency and anti-kickback regulations.



## Antitrust, Fair Competition Laws and Competitive Intelligence

Antitrust and competition laws protect free enterprise and prohibit interactions between competitors that affect prices, terms or conditions of sale, or fair competition. We are committed to competing fairly and following the antitrust and competition laws and expect our Suppliers not to engage in, nor be a party to, agreements, business practices or conduct that, as a matter of law, are anti-competitive. Our Suppliers must not fix prices, rig bids, allocate customers or markets, or exchange current, recent or future pricing information with their competitors.

## Trade Laws and Restrictions

Our Suppliers must comply with all applicable export and import controls, anti-boycott regulations, economic sanctions and other applicable trade laws, regulations, policies, and procedures. This applies wherever our Suppliers operate, including when they sell or transfer products and services to Treace.



## Our Commitment to EXCELLENCE

Our Suppliers must also ensure their employees, contractors, agents, suppliers and other parties working on their behalf act in accordance with applicable laws and the standards set out in the Supplier Code. This includes:

- Conducting appropriate due diligence on their own suppliers by validating their compliance with applicable law, good manufacturing practices, quality standards, and by screening for bribery and corruption, trade compliance and modern slavery risks;
- Including appropriate terms and conditions in their supply contracts to ensure these requirements are cascaded throughout their own supply chain;
- Enforcing these terms and conditions when necessary; and
- Monitoring their own suppliers for behavior which is, or may be perceived to be, corrupt or fraudulent.



Our Suppliers must conduct their business without engaging in corrupt practices and/or taking advantage of anyone through unfair dealing. This includes ensuring the quality, features or availability of their products or services are accurately represented.

## Fair Competition

We expect Suppliers to deal honestly, ethically and fairly with Treace and its employees and representatives and not to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice. Inappropriate use of proprietary information, misusing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is also prohibited.



## Notice of Procurement Restrictions

If Supplier has ever been excluded, debarred, or suspended, or become otherwise ineligible to participate in procurement programs, Supplier must disclose this immediately to Treace's Chief Ethics & Compliance Officer, [compliance@treace.net](mailto:compliance@treace.net). Supplier also must disclose if Supplier is under investigation for certain criminal offenses and may become excluded, debarred, or suspended.

### Recording and Reporting Information

Accurate information is essential to an organization's ability to satisfy legal and regulatory obligations. Consequently, our Suppliers must record all business transactions accurately, prudently and transparently, in compliance with applicable accounting standards and recognized best practice. Supplier will not sign or submit or permit others to sign or submit to Treace, any document or statement that Supplier knows or has reason to believe is false or inaccurate.

### Accuracy of Business Records

All Supplier invoices, records and accounts must accurately reflect transactions and events, and conform both to generally accepted accounting principles and to an appropriate system of internal controls. Our Suppliers must maintain an independent internal or external audit function that monitors the effectiveness of internal controls, and provide an ongoing management process for identifying, evaluating, and managing significant business risk and reporting to the Supplier's own board of directors or other management structure, as appropriate.

### Pay All Taxes Due and Avoid Facilitating Tax Evasion From Others

Our Suppliers pay their taxes whenever and wherever due. They must not knowingly assist others to evade taxes by taking deliberate steps to help them, including turning a blind eye, nor otherwise involve themselves in the evasion of taxes anywhere in the world.

### Keep Adequate Insurance

Our Suppliers are expected to obtain and maintain proper levels of insurance for their business and employees.



## Gifts and Gratuities, No Bribes, Kickbacks, or similar inducements

As a United States entity, Treace is subject to the Foreign Corrupt Practices Act (FCPA), which makes it illegal for companies and individuals to make, or offer to make, payment, directly or indirectly, to foreign governmental officials for the purposes of obtaining, retaining or directing business. Other countries have adopted similar legislation. All Suppliers must fully comply with anti-corruption laws, including the FCPA, and anti-money laundering laws.

Treace strictly prohibits Suppliers from giving anything of value, directly or indirectly, to a government official, agent or employee anywhere in the world in consideration for such official's, agent's or employee's assistance or influence (including the failure by such individual to perform his/her official duty), the purpose of which is to obtain favored treatment with respect to any aspect of Treace's business. This includes payments to, or entertainment of, government officials and 'facilitation payments' made to facilitate or speed up official or governmental procedures.

Furthermore, Treace does not allow any bribes or improper payments, including kickbacks, unexplained rebates, payment for advertising, or gifts disguised as allowances or expenses. Our Suppliers must not offer, promise, give, demand or accept (nor tolerate anyone else paying or accepting) bribes, kickbacks, or other similar payments or inducements, in order to obtain, retain or give business or other advantage.

This includes excessive or frequent gifts and entertainment as defined under their own gift and entertainment policy and/or local standards, whichever is stricter. Suppliers must also be careful to avoid giving the appearance of such improper conduct.

## Respect Treace Position on Gifts, Gratuities and Favors

We prefer that Suppliers do not give gifts to our employees or their family members, particularly gifts with a value over \$150.

Our gifts and gratuity policy may require our employees to return gifts, gratuities or other favors from Suppliers,

other than items of insignificant value (i.e., less than \$150). Our employees are not allowed to solicit gifts, gratuities or favors from Suppliers, and Suppliers should never feel obliged to offer gifts, gratuities or favors to our employees. If a Treace employee or their family member solicits a gift or gratuity from a Supplier that violates this policy, we request that the Supplier report the situation to [compliance@treace.net](mailto:compliance@treace.net).



### Source Minerals Responsibly

Suppliers must have policies in place that reasonably ensure that the tantalum, tin, tungsten, and gold in the products they manufacture come from socially and environmentally responsible sources and do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Any minerals and components used in products supplied to us should be responsibly sourced in compliance with applicable law and sustainable practices. Our Suppliers should exercise adequate due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

### Responsible Sourcing of Other Components

Suppliers must exercise due diligence and mitigate potential risks, for any materials and/or suppliers in their supply chain originating from high-risk regions, including those associated with armed conflict, child labor, forced or involuntary labor, human trafficking, gross human rights violations, severe health and safety risks, substantially negative environmental impacts or other similar, reasonably objective, high-risk activities.

### Safe Working Environment

Our Suppliers are not permitted to use (or threaten to use) physical discipline or abuse or the threat or other forms of physical coercion or harassment of their employees or workers.

### Comply With Immigration Laws and Proper Documentation

Suppliers must employ or use only workers who have or will obtain a legal right to work in the jurisdiction in which the Supplier intends to hire such employees. Our Suppliers must review appropriate and relevant documentation and ensure the legal status of employees prior to hiring such employees.

### Employment Information

Suppliers must provide employees with clear information about wages, benefits, working hours and other terms and conditions of employment.

### Freedom of Association

Suppliers must comply with all laws regarding the rights of employees to associate or not associate with any legally constituted group.





### Child labor and young workers

Suppliers must not use child labor and must comply with all applicable child labor laws, including those addressing limitations on age, quantity of hours and types of permissible work.

### Forced labor, involuntary labor and human trafficking

Suppliers must prohibit any support, promotion or use of compulsory labor, slavery, forced or involuntary labor, or human trafficking of any kind.

### Freedom of movement

Unreasonable restrictions on the ability of Supplier's employees to leave the workplace or to terminate employment, including holding original copies of employee identification documents (passports or other identity papers) is prohibited.

### Wages and benefits

Suppliers must comply with all applicable age and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and proper classification, and provide legally required benefits. In addition, our Suppliers are prohibited from using unlawful deductions from wages for hours worked as a disciplinary measure.



## Collaboration

At Treace, we enlist the willing cooperation of others, we surround ourselves with high performers, we maintain an employee friendly environment and we have fun doing our job!

Treace is committed to fairness, cooperation, teamwork, and trust – all vital components to our core value of Collaboration. Consistent with this value, we expect our Suppliers to avoid hostility, harassment, or retaliation and to encourage collaborative relationships.

Treace is committed to sustainable and ethical business operations. We respect human rights, consider our environmental impact, and seek to foster health, safety, inclusion, fairness, cooperation, and trust across our operations and supply chain.

We expect our Suppliers to maintain these same values and behaviors.



## We Do Not Tolerate Discrimination, Harassment, or Retaliation

We promote and value a work environment free of discrimination, harassment, and retaliation as defined by applicable laws. Likewise, we expect Suppliers to provide a safe and drug-free workplace that is free from discrimination based on race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation or identity, or any other impermissible factors.

### Our Commitment to COLLABORATION

Consistent with Treace's work environment, our Suppliers are expected to promote a work environment free from harassment, including any unwelcome comments, behaviors, actions, or conduct that denigrates or demonstrates hostility based on protected personal characteristic. We prohibit conduct that creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an individual's ability to work.

When interacting with Treace personnel, Suppliers are responsible for ensuring that their personnel do not:

- make derogatory comments based on a person's protected class;
- make unwelcome sexual advances; or
- engage in other illegal discrimination or harassment.



## We Embrace Fairness and Collaboration

At Treace, Collaboration means that every person deserves to be seen, heard, and cared for. This happens when we are inclusive and act with integrity. We celebrate our differences and take action to advance fairness across our workforce and our business. We encourage our Suppliers to embrace these same principles.

We seek to ensure that our workforce and supply chain have the expertise to effectively support the HCPs we serve and their patients. So we are committed to providing equal employment opportunities to job applicants and colleagues, and we treat them without regard to personal characteristics protected by applicable laws.

We expect Suppliers to also provide equal employment opportunities.

### Our Commitment to COLLABORATION

- We seek out and hire talented personnel by working with external organizations that provide rich engagement opportunities with people of varying backgrounds, ethnicities, and other unique traits.
- We celebrate the unique qualities, perspectives, and life experiences that define us as individuals and seek to provide underrepresented or disadvantaged businesses an equal opportunity to compete for our business.
- Suppliers that are certified as woman businesses, minority, veteran or other underrepresented or disadvantaged businesses should promptly report that status to their Treace contact.



## We Prioritize Health and Safety

Protecting the environment and the health and safety of our colleagues, visitors and the communities in which we operate is a business priority and is core to Treace's values of Excellence and Collaboration.

We expect our Suppliers, as a minimum standard, to comply with all applicable health and safety laws and regulations and to provide a clean and hygienic workplace for their employees, Treace employees and other visitors. Our Suppliers should properly identify and assess hazards and risks associated with the use of their products or services and ensure that adequate safeguards and working practices are in place to reduce or eliminate them.

We encourage Suppliers to integrate climate action and sustainability into the lifecycle of products to address global challenges and preserve resources for future generations.

### Our Commitment to EXCELLENCE AND COLLABORATION

Our Suppliers must comply with all applicable health, safety and environmental laws and regulations and, as far as reasonably practicable, ensure that any detrimental effects from its activities, products and services upon the environment are minimized.

Suppliers must:

- Obtain and keep current all required environmental permits and registrations;
- Consider reducing, controlling and/or eliminating wastewater, waste and pollution at the source, air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products;
- Minimize the use of water where practical;
- Consider how to reduce emissions of greenhouse gas in accordance with applicable laws and regulations and track progress on greenhouse gas reduction targets;
- Conform to applicable labeling and warning requirements; and
- Identify, manage, store, move and handle hazardous substances in accordance with applicable law.

Our Suppliers must also comply with all applicable local or national restricted substance requirements.

Our Suppliers must be able to provide evidence, upon request, of their compliance with such laws and disclose the quantity of any restricted substances in the materials/products provided to Treace.

## We Collaborate To Address Concerns



## Cooperation with Treace Investigations of Compliance with this Supplier Code

While our Suppliers are expected to self-monitor and have corrective action processes for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews, our Suppliers must:

- provide Treace with any information it reasonably requests to demonstrate Supplier's compliance with this Supplier Code;
- certify its compliance with this Supplier Code on request; and
- allow Treace employees, third party auditors and government investigators to visit Supplier facilities, access Supplier records, and meet with Supplier personnel in connection with verifying compliance with this Supplier Code.

### Training

If requested, our Suppliers may be required to attend training sessions on this Supplier Code or other Treace policies.

Compliance with the Supplier Code and attendance at any training sessions is required in addition to any other obligations in any agreement a Supplier may have with Treace.

- Raise concerns when safety, quality, or integrity are in question.
- Raise concerns when potential or actual violations of this Supplier Code or applicable laws or regulations are at issue.
- Confidentiality of the reporting person is maintained to the extent possible.

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TREACE<sup>®</sup>  
A Step Ahead.™