

Supplier Handbook

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FORT WAYNE METALS

Welcome

Thank you for your interest in business opportunities with Fort Wayne Metals. We understand and recognize the vital role our Suppliers play in the value we offer our customers. To our existing Suppliers, we are grateful that you have chosen to do business with us. And to our potential new Suppliers, we appreciate the opportunity to provide information about Fort Wayne Metals.



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Mission statement

Our company was founded and continues to grow because of our dedication to making medical grade wire. Our mission is to continually improve the quality of our products, the speed and efficiency with which we respond to our customers' requests, and our level of understanding of the materials we work with and recommend.

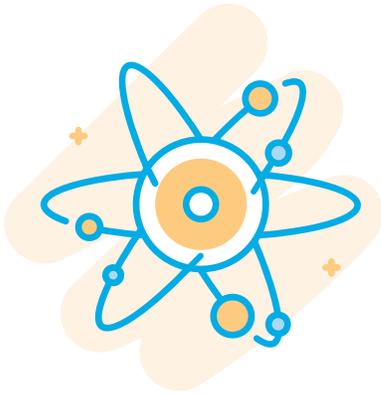
Values

The following values are fundamental to the success of our company:

- › Our people are the source of our strength.
- › The quality of our products and services, the culture within our organization, and our support of the community are the basis by which we are judged.
- › We meet tomorrow's challenges by maintaining direct customer relationships, by being innovative leaders in our field, and utilizing technology to advance our research and our processes.
- › We respect our customers' need for confidentiality.
- › We must remain profitable to sustain growth and provide return for shareholders.

Our employees are expected to follow these values in all aspects of business, including dealings with suppliers. Fort Wayne Metals wants to develop relationships with suppliers who follow the expectations set forth in this handbook. We will work with suppliers to establish action plans to assist them in conforming to any expectations that are deemed to be in need of improvement.

By communicating these expectations, Fort Wayne Metals is not conferring on any third parties any rights, remedies, or obligations.



Purpose and scope

The purpose of this Supplier Handbook is to clearly communicate our expectations to all new and existing external Suppliers. These expectations shall apply to the development and manufacture of all products and services supplied to Fort Wayne Metals. As a Supplier, you are critical to our success in delivering high-quality product to our customers at the right time. Therefore, it is important for us to set expectations, identify gaps, and track progress of gap resolution. Fort Wayne Metals considers preferential long-term relationships with those Suppliers who have achieved, or who are committed to achieving, these requirements. The expectations may take the form of a separate Quality Agreement, or an exhibit or addendum thereto, or content in a purchase order or other agreement. They also encompass the expectations set forth in this handbook, as well as in other documents such as engineering specifications. The expectations within this handbook are provided as a supplement to, and not as a replacement of or amendment to, the terms or conditions of any agreements, engineering drawings, purchase orders, or specifications. To the extent the terms of this handbook conflict with the terms of agreements, engineering drawings, purchase orders or specifications, the terms of the agreement, engineering drawings, purchase orders or specifications will control.

Complex global regulatory compliance obligations, customer driven requirements, and corporate social responsibility and sustainable practices require companies to demand transparency in the products and services they are sourcing and their suppliers. To mitigate the risks and comply with various global regulations of supplied products and services, Fort Wayne Metals' suppliers will be required to supply information regarding the expectations set forth in this handbook.

Social responsibility

1.1 Child labor

All workers must be at least the minimum working age required by local laws and customs. All workers must be made aware of any exposure to conditions that are hazardous to health and safety, and the age of these exposed workers must comply with local laws and customs. Workers must use the appropriate personal protective equipment.

1.2 Forced labor

Suppliers shall not use involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor or prison labor, for profit-making enterprises. Suppliers shall not require monetary deposits or retain identity papers or work permits as a condition of work.

1.3 Workplace

Suppliers shall provide all workers with access to a safe, healthy, and sanitary workplace, including, but not limited to, accessible and clean toilets, safe drinking water, sanitary facilities for food storage, and adequate fire exits. Suppliers are expected to have a worker health and safety program addressing physical, chemical and biological hazards in the workplace.

1.4 Equal opportunities

Suppliers shall provide equal opportunity to all applicants and workers without regard to race, age, religion, gender, gender identity, national origin, ancestry, disability, veteran status, sexual orientation, genetic information, or any other status protected under applicable law.

1.5 Abuse (humane treatment)

Workers shall not be subjected to corporal punishment, mental coercion, physical contact, sexual coercion, verbal abuse, or the use of gestures, language, or graphic materials that are threatening, abusive, or exploitative.

1.6 Work hours and compensation

Work hours shall be in compliance with applicable laws and standards. Overtime shall be administered and compensated fairly and in accordance with local laws. All wages and fringe benefits must meet legal and industry minimums. Except to the extent permitted by applicable law, deductions from wages as a disciplinary measure are not permitted.

1.7 Health and safety

Suppliers should strive to have in place a formal health and safety program that addresses accident prevention and reporting, and promotes employee training, as well as emergency preparedness and response.



Environmental compliance & stewardship

Fort Wayne Metals is committed to maintaining an environmental management system that complies with all applicable legal environmental regulations and other requirements, prevents pollution, and continually improves environmental performance through regular reviews of environmental goals, objectives, and targets. Please visit the Fort Wayne Metals website to review the Fort Wayne Metals Environmental Policy: fwmetals.com/about/corporate-responsibility/ehs-s/

Fort Wayne Metals expects our Suppliers to be responsible global citizens. As a Fort Wayne Metals' Supplier, we expect products and services supplied to Fort Wayne Metals will meet the requirements of country, federal, state and local environmental regulations. The list below includes some of the regulations; however, compliance is not limited to these regulations. Additional information may be required, such as certification to any of the following regulations or chemical composition of products and services. If you suspect that products and/or services supplied to Fort Wayne Metals are not compliant, please contact the appropriate supply chain representative immediately.

2.1 Regulatory compliance

Suppliers shall comply with all country and local environmental regulations for the regions in which they operate.

2.2 Emissions & discharges

Suppliers will measure and report, in accordance with regional requirements, water, land, and air discharges into the environment. Suppliers should strive to look for ways to reduce these emissions.

2.3 Conservation & sustainability

Suppliers should actively work to reduce the consumption of energy, water, and other non-renewable natural resources.

2.4 Reduce / reuse / recycle

Suppliers will strive to reduce, reuse and recycle material within their manufacturing operations. Recycling processes will employ closed-loop systems wherever possible to achieve maximal use of a material or product. Hazardous waste will be properly handled, stored and disposed of in accordance with local regulations.

2.5 Regulated substances

Supplier will have adequate systems in place designed to identify and disclose to Fort Wayne Metals all chemicals in their products and product sub-components that are regulated by the governments and/or competent authorities in the regions where they are being used and are deemed hazardous, toxic, or carcinogenic.

These regulations include, but are not limited to:

- › Waste Electrical and Electronic Equipment (WEEE): Design of electric components to reduce waste and facilitate disassembly for recycle.
- › Registration, Evaluation, Authorization and Restriction of Chemicals (REACH): Chemicals, substances, and intermediates above certain volumes and/or containing substances of very high concern (SVHC) must be disclosed to Fort Wayne Metals.
- › Restriction of Hazardous Substances (RoHS): Hazardous substances contained in electrical products. Supplier shall disclose to Fort Wayne Metals if their products contain any restricted substances in concentrations above the limits stated in the RoHS Directive.
- › Materials of Animal Origin: Supplier shall manufacture products in compliance with ISO 22442 and/or EU Regulation 722/2012.
- › Packaging: Package management using fundamental principles of reuse of packaging, recycling, and other forms of recovering packaging wastes to reduce final disposal. Packaging or packaging components must not contain lead, cadmium, mercury, or hexavalent chromium.
- › Supplier shall provide information regarding materials of special interest to Fort Wayne Metals including, but are not limited to: phthalates, Bisphenol A, Latex, Silicone, carcinogens, heavy metals, and persistent bio-accumulative and toxic materials.

2.6 Transportation logistics

Suppliers will optimize transportation strategies to minimize the environmental footprint of all products shipped. This includes consideration of transportation modes and distances, as well as packaging material types and quantities. All transportation laws will be followed for the regions in which they operate.

2.7 Life cycle analysis

Suppliers will strive to optimize the environmental performance of their products and operations through a life cycle analysis approach for products, processes, and/or services.



Ethical Practices

3.1 Fair dealing

Fort Wayne Metals endeavors to deal fairly with Suppliers in accordance with ethical business practices. We expect that our Suppliers do the same in dealing with Fort Wayne Metals.

3.2 Conflicts of interest

Fort Wayne Metals associates or members of their immediate family cannot work for Fort Wayne Metals' Suppliers unless such potential conflicts of interest are disclosed and addressed.

3.3 Anti-corruption

Fort Wayne Metals prohibits payment or acceptance of bribes or kickbacks, or any other transaction that creates the impression of impropriety, either to Fort Wayne Metals or its employees, agents, or representatives, or to any governmental entity, agency, official or representative. Fort Wayne Metals also expects the same of Suppliers.

3.4 Supplier relations

Fort Wayne Metals buys solely upon quality, performance, suitability of the product or service, and cost. Fort Wayne Metals does not accept improper gifts or entertainment from Suppliers.

3.5 Compliance with applicable laws

Fort Wayne Metals expects Suppliers to comply fully with all applicable laws, including, but not limited to, anti-boycott regulations, all applicable healthcare laws, and all applicable anti-corruption laws. Suppliers must not be ineligible to participate in the U.S. federal procurement or non-procurement programs.

3.6 Confidentiality and intellectual property

Suppliers shall safeguard Fort Wayne Metals' and its customers' confidential and proprietary information. Fort Wayne Metals actively protects and enforces its intellectual property and respects the intellectual property of others. We expect our Suppliers to do so as well. Suppliers shall not use or disclose Fort Wayne Metals' confidential and proprietary information without Fort Wayne Metals' prior written consent. All information or data relating to Fort Wayne Metals' business or operations shall be treated as confidential unless such information is publicly available. Fort Wayne Metals' confidential information includes, but is not limited to: customer and supplier lists and information, technical data, drawings, specifications, models, samples, prototypes, processes (including manufacturing and production processes), techniques, methods, know-how, pricing, inventions (whether or not patentable), trade secrets, intellectual property, research and development, test results, financial information, and product applications. Suppliers shall ensure that all of their subcontractors and suppliers fully comply

with these non-use and non-disclosure requirements with respect to Fort Wayne Metals' confidential and proprietary information, including any terms of a non-disclosure agreement executed by the Parties.

3.7 United States Government contracts

Fort Wayne Metals' purchase of products from Suppliers may be in support of a United States government contract or subcontract. Suppliers agree to comply with all applicable government procurement regulations, including, but not limited to, the Federal Acquisition Regulations (FAR) and Defense Federal Acquisition Regulations Supplement (DFARS), which are mandated by Federal Statute and flow down to all relevant subcontractors. Suppliers shall immediately disclose to Fort Wayne Metals if Suppliers, or any of their principals, consultants, subcontractors, suppliers, officers, or directors, become barred or suspended, whether permanently or temporarily, from conducting business under U.S. Government contracts.

3.8 DPAS rated orders

As a Supplier to the US Department of Defense, Fort Wayne Metals will, from time to time, accept orders or contracts that are governed by the provisions of the Defense Priorities and Allocation System (DPAS). The purpose of the DPAS is to: 1) assure timely delivery of materials and services from private industry to meet National Defense needs; and 2) provide an operating system to support rapid industry response to Government Procurement needs in times of need. Suppliers shall be prepared and may be required to comply with the requirements of the DPAS, if applicable.

3.9 International trade

Supplier acknowledge that the performance of any work by Suppliers may involve the use of or access to articles, technical data or software that is subject to export controls under the U.S. International Traffic in Arms Regulations or ("ITAR") or U.S. Export Administration Regulations ("EAR"). Any purchase order, quote, specification, print, or other document may contain technology/technical data whose export is restricted in accordance with U.S. export regulations. Suppliers shall ensure Suppliers and all of their subcontractors and suppliers fully comply with these export laws, including maintaining accurate export control classifications and obtaining relevant licenses and /or other authorization(s) when required.

Suppliers shall comply with requirements governing import and export declarations, including import tariff codes, country of origin declarations, and accurate customs valuations.

Suppliers shall fully comply with applicable sanctions programs, including country-specific and targeted sanctions against individuals, entities, and groups, and ensure their suppliers and subcontractors fully comply with the same.

3.10 Whistleblower protection

Fort Wayne Metals' Suppliers shall prohibit retaliation against any employee submitting a concern in good faith. Employees have the right to remain anonymous and should be protected under applicable whistleblower laws.

3.11 Conflict minerals

Conflict minerals include tantalum, tungsten, tin, gold, and any derivatives that originated in the Democratic Republic of the Congo (DRC) or any adjoining country. Suppliers must source conflict minerals in accordance with applicable laws and regulations, conduct appropriate due diligence within its supply chain to determine the origin of the conflict minerals, and disclose conflict minerals in the products it supplies if the minerals are necessary to the functionality or production of the product.

3.12 Anti-money laundering

Fort Wayne Metals expects Suppliers to perform due diligence, evaluate risk, and implement policies to reduce the opportunity for money laundering throughout their supply chain, and comply with applicable relevant laws.

Governance



4.1 Sub-suppliers

Suppliers shall have a program to provide that their own subcontractors and suppliers meet expectations consistent with those set out in this handbook.

4.2 Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with the expectations in this handbook and compliance with applicable laws and regulations. This documentation must be made available for Fort Wayne Metals' review upon request. If Suppliers cannot maintain the documentation for 55 years, they should notify Fort Wayne Metals.

4.3 Management systems

Suppliers shall have a training program to ensure an appropriate level of knowledge, skills, and abilities to meet the expectations in this handbook.

4.4 Assessment

Suppliers shall notify Fort Wayne Metals immediately if they, or their suppliers, fail to comply with the expectations in this handbook. Suppliers shall authorize Fort Wayne Metals or an

independent third party to conduct site inspections, with or without notice, audits and/or surveys to confirm adherence to the expectations set forth in this handbook. Failure to meet these expectations may result in a change in the business relationship between Fort Wayne Metals and Suppliers. Notwithstanding the above, Fort Wayne Metals assumes no duty or obligation to audit or review Suppliers' compliance with the expectations in this handbook, and assumes no liability or responsibility for the actions or omissions of Suppliers.

4.5 Business continuity

Fort Wayne Metals expects our Suppliers to complete a formal Business continuity/Disaster recovery plan.

4.6. Cybersecurity

Fort Wayne Metals understands that cybersecurity is an essential function of its business and has the same expectations of its Suppliers. Based on industry best practices, Suppliers shall establish and maintain an information and system security program to protect data and systems from unauthorized access, loss, alteration, misuse, and other malicious threats. Suppliers shall maintain appropriate network security measures and antivirus and malware protection software, and Fort Wayne Metals reserves the right to audit Suppliers' security measures. Suppliers will notify Fort Wayne Metals within forty-eight (48) hours of any cyber incidents involving Fort Wayne Metals' data.

4.7 Continuous improvement

Fort Wayne Metals is dedicated to continuous improvement. Fort Wayne Metals has adopted Six Sigma and Lean methodologies throughout its global manufacturing operations to reduce variation and eliminate waste. Fort Wayne Metals encourages Suppliers to work with us on Lean and Six Sigma projects at their facilities.

4.8 Change management

Suppliers are expected to notify Fort Wayne Metals of any changes to their quality management systems or processes that would directly affect the product(s) or service(s) provided to Fort Wayne Metals. These processes would include, but are not limited to, raw material, components, conversion work, packaging, and processing aids. The changes will be evaluated for potential impact to determine if any actions are necessary. For any questions, please contact **SupplierQuality@fwmetals.com**.

4.9 Sub-tier supplier control

Suppliers must maintain qualifications for subcontractors and the products purchased through them. It is the responsibility of Suppliers to ensure and control the quality of all material purchased to manufacture Fort Wayne Metals' raw material, components, conversion work, packaging, and processing aids.

LOCATIONS AROUND THE WORLD

Global Headquarters
Fort Wayne, Indiana, U.S.A.

European Headquarters
Castlebar, Co. Mayo, Ireland

Advanced Materials Development
Columbia City, Indiana, U.S.A.

International Sales Support
Miami, Florida, U.S.A.
Tamil Nadu, India
Tokyo, Japan
Savyon, Israel
Seoul, Korea
Shanghai, China
Augsburg, Germany

U.S.A. Sales Support
Chanhassen, Minnesota
Ridgefield, Connecticut
San Mateo, California

Find your sales representative at
fwmetals.com/find-your-rep



FORT WAYNE METALS
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