

Supplier Code of Conduct

Introduction

Intuitive is a global technology leader in minimally invasive care and the pioneer of robotic surgery. We strive to meaningfully improve patient care while being responsible stewards of the environment, our communities, and our governance values. Intuitive is committed to the highest standards of business conduct and we consider our supply chain to be an extension of our business.

This Intuitive Supplier Code of Conduct ("**Code**") sets the standard of excellence and commitment to legal, ethical, environmental, and social responsibility that we expect from all Intuitive suppliers ("**Suppliers**"). We also expect Suppliers to communicate the Code to their own supply chain and take steps to encourage their suppliers to adhere to the same standards. Supplier may also maintain their own supplier code of conduct that meets or exceeds the standards set forth in this Code.

For more information, see the [Suppliers](#) section of our website.

Supplier Expectations

Respect for Fundamental Human and Labor Rights

Suppliers are to conduct their business in a manner that respects the rights and dignity of all people, in alignment with Intuitive's [Position on Human Rights](#), the International Labour Organization ("**ILO**") core conventions (Nos. 29, 87, 98, 100, 105, 111, 138 and 182), the ILO-IOE Child Labor Guidance Tool for Business, and either the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights. We ask Suppliers to maintain documented evidence of implementing these positions, including the human and labor rights below; Intuitive reserves the right to request Suppliers to provide this evidence to Intuitive.

Prohibition of Child Labor: Suppliers shall prohibit the use of child labor. The employment of young persons shall conform with ILO Conventions 138 and 182 and

comply with all applicable laws and regulations concerning age, hours, compensation, health, and safety.

Prohibition of Forced Labor: Suppliers shall prohibit the use of any form of forced, bonded, or compulsory labor. Suppliers shall not engage in any form of human trafficking or any slavery-like practices, including involuntary prison labor.

All work must be voluntary and carried out without the threat of punishment. This includes ensuring that workers, including foreign migrant workers, can move freely to and from their employment or residence; need not pay recruitment fees or deposits to secure their job; and are not expected to surrender their passports or other legal documents or pay a fee to an employer before commencing work.

All workers must be free to leave their jobs after reasonable notice and are paid wages on time and in full upon leaving. No wages should be retained by the employer, in line with local legal requirements.

Employment Information: As part of the hiring process, all workers must be provided with a written employment letter or agreement in their native language that contains a description of the terms and conditions of their employment. Suppliers must provide employees with clear and accurate information about wages, benefits, working hours and other terms and conditions of employment. Terms of employment or contracts must adhere to all applicable local legal requirements regarding the terms of employment.

Non-Discrimination and Non-Harassment: Suppliers shall provide a workplace free of harassment and discrimination, including race, color, sex, religion, political opinion, national extraction or social origin, or other characteristic or group status protected by law.

Humane Treatment: Supplier shall provide a workplace free of inhumane treatment, or the threat thereof, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers.

Wages, Working Hours, and Benefits: Suppliers must comply with all applicable wage, working hours, and benefits laws and regulations, including those related to minimum wages, maximum working hours per week, overtime hours and pay, prohibitions on excessive overtime, and mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted.

In compliance with local laws, Suppliers must inform workers if overtime is required and pay wages for overtime work at pay rates greater than regular hourly rates. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of local law.

Freedom of Association: Suppliers shall respect the rights of each worker to associate freely, join or not join labor unions, seek representation, and join workers' councils.

Suppliers must neither favor nor discriminate against members of worker organizations or trade unions, and ensure workers and/or their representatives can communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment.

Safe and Healthy Working Environment

Suppliers shall provide a safe, clean, and healthy working environment that meets all applicable environmental, health, and safety regulations. We may ask Suppliers to show documented evidence of implementing these regulations.

Occupational Health and Safety: Suppliers are expected to maintain a safe work environment and to prevent occupational injuries and safety incidents. As such, Suppliers shall:

- Comply with all applicable environmental, health, and safety laws and regulations;
- Have systems and programs in place to identify occupational and process hazards;
- Protect workers from identified risks, including exposure to ergonomic, chemical, biological, and physical hazards, as well as to risks associated with physically demanding tasks;
- Prevent excessive physical or mental fatigue;
- Inform and train workers about applicable health protection and safety standards, as well as safety measures;
- Provide workers with access to sufficient drinking water and clean sanitary facilities;
- Provide appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures, including providing employees with appropriate personal protective equipment and ensure they use it accordingly; and
- Communicate workplace hazards effectively to applicable workers.

Emergency Preparedness and Response: Suppliers shall identify and assess potential emergency situations and minimize their impact by implementing emergency plans and response procedures, which includes emergency reporting, employee notification and evacuation procedures, worker training, and drills in compliance with applicable laws and regulations.

Environmental Responsibility

Intuitive is committed to its mission of delivering minimally invasive care in an environmentally responsible manner. We expect our Suppliers to operate in an environmentally responsible manner and to encourage their supply base to do the same.

Environmental Permits and Authorization: In compliance with all applicable environmental legal requirements, Suppliers shall obtain, maintain, and keep current any required licenses, permits, approvals, registrations, and authorizations and shall follow all relevant operational and/or reporting requirements.

Environmental Regulatory Compliance: Suppliers shall comply with all applicable environmental regulations, including but not limited to the regulations below:

- Chemical-related regulations;
- Waste-related regulations;
- Regulations on the safe handling, storage, recycling, and disposal of hazardous substances;
- Regulations and any customer requirements regarding the prohibition, restriction, or labeling of specific substances in products and manufacturing, including labeling for recycling and disposal;
- Regulations governing the emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion byproducts generated from operations; and
- Product and packaging related sustainability regulations regarding the sourcing of inputs, product and packaging design, performance, composition and labeling, and end-of-life treatment

Suppliers are expected to provide complete and accurate information and documentation, as necessary, to facilitate Intuitive's compliance with relevant environmental laws.

Environmental Stewardship: Suppliers must strive to operate in a manner that minimizes negative environmental impacts, prevents pollution, and preserves our natural resources, while ensuring product quality and safety for patients.

Suppliers are encouraged to implement a comprehensive environmental management system, and to continually monitor, review, and improve their environmental performance. Intuitive expects Suppliers to support certification audits that drive ongoing improvements for specific focus areas of performance evaluation. ISO 14001:2015 certification is an example of ongoing commitment to an Environmental Management System. We may ask Suppliers to show documented evidence of implementing environmental management practices that help their organizations minimize how their operations affect the environment. We expect manufacturing Suppliers to be certified to ISO 13485:2016 or provide other evidence of robust quality management systems. Other standards may also be applicable depending on the products or services provided by a Supplier to Intuitive.

We encourage Suppliers to be transparent about their environmental practices and performance via established global reporting frameworks or platforms. Intuitive may request Supplier's environmental sustainability data related to products and/or services procured by Intuitive for the purposes of external reporting, benchmarking, and auditing.

Emissions Reductions: Suppliers are to minimize generation and disposal of waste, emissions to air, and discharges to water, with the potential to adversely impact human health or the livelihoods or way of life of local communities and/or the environment. Emissions must be properly managed, controlled, and/or treated prior to release into the environment. We reserve the right to ask Suppliers how they publicly track, calculate, and publicly report their Scope 1, 2 and 3 greenhouse gas emissions under the Greenhouse Gas Protocol and look for methods to improve energy efficiency and to minimize their greenhouse gas emissions.

Ethical Business Practices

Suppliers must conduct their business in an ethical manner and act with integrity.

Business Integrity: Suppliers shall uphold the highest standards of integrity in all business activities, including having a zero-tolerance policy regarding all forms of bribery, corruption, extortion, embezzlement, and money laundering. Bribes or other means of obtaining undue or improper advantage are not to be given, offered, or promised, either directly or through a third party. Monitoring, record keeping, and enforcement procedures shall be implemented in compliance with anti-corruption laws.

Suppliers must also not provide gifts of any kind, including personal gifts or promotional aids, etc., whether branded or unbranded, to Healthcare Professionals (“HCPs”) or their family members. This includes payments in cash or cash equivalents (such as gift certificates).

Transparency and Accurate Recordkeeping: Suppliers shall conduct their business in a transparent manner in compliance with applicable legal and regulatory requirements. Suppliers commit to keeping accurate books and records, disclosing information in accordance with applicable regulations and prevailing industry practices, and prohibiting any falsification of records or misrepresentations of conditions or practices in their operations and supply chain.

Conflicts of Interest: Suppliers must take steps to identify, avoid, disclose, and manage any actual or potential conflicts of interest, including those with their customers, government entities, or relationships with Intuitive employees or their relatives.

Fair Dealing, Advertising, and Competition: Suppliers to adhere to industry standards of fair business practices, fair, accurate, and truthful advertising, and fair competition. Suppliers are to comply with applicable antitrust and anti-competition laws.

Responsible Sourcing of Minerals: Suppliers are to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as any applicable regulations on conflict minerals, such as Section 1502 of the Dodd-Frank Act or the EU Conflict Minerals Regulation.

Suppliers handling production involving minerals-related materials are expected to perform due diligence on their supply chain. We expect suppliers to participate annually in providing Intuitive with Conflict Minerals reporting in a timely manner and disclose any changes to the status of minerals they become aware of, including the conformant status of smelters or refiners within their supply chain that impacts products supplied to Intuitive.

Data Protection and Cybersecurity: Suppliers are to comply with all applicable data protection and privacy, cybersecurity, and information security laws and regulatory requirements. Suppliers shall safeguard and make only proper use of confidential information to ensure that company, worker, and patient privacy rights are protected. Suppliers must act to prevent loss, misuse, theft, fraud, improper access, disclosure, or alteration of confidential information, including unauthorized communication and/or publication of information acquired from or on behalf of Intuitive.

Trade Compliance: Suppliers are to adhere to all applicable import and export control laws, regulations, and sanctions of the country where Supplier resides, the United States, and any other country where transactions are conducted. This includes, but is not limited to, the import, export, re-export, transfer, or disclosure of goods, software, technology, or technical information.

Suppliers are expected to provide complete and accurate information and documentation to facilitate compliance with trade laws, and to work closely with Intuitive to determine applicable export control restrictions. All transactions, regardless of the method of transfer, must comply with trade restrictions, including adherence to restrictions on specific countries, parties, goods, technologies, and services.

Intellectual Property: Suppliers must respect Intuitive's intellectual property rights, including patents, trade secrets, trademarks, copyrights and equivalent rights, and comply with all requirements governing their use. Suppliers shall manage technology in a manner that protects intellectual property rights.

Quality and Management Systems

Suppliers are expected to have appropriate management systems to support conformance with this Code and other Intuitive requirements, to identify risks within their supply chains, to take appropriate measures to mitigate identified risks, and to facilitate continuous improvement.

The management system should contain the following elements, as appropriate to the size, nature, and complexity of the Supplier and in accordance with applicable laws: (a) publish a policy on corporate social and environmental responsibility that is endorsed by senior management; (b) clearly identify senior executive(s) responsible for governance of

management systems; (c) maintain a documented business continuity plan, which may be reviewed by Intuitive upon request, that maps the Supplier's critical supply chains relevant to products supplied to Intuitive and that evaluates and addresses potential risks and maintains mechanisms to address business disruptions such as natural disasters, terrorism, software viruses, illness, pandemics, or infectious diseases; (d) create, maintain, and secure documentation and records to ensure and demonstrate regulatory compliance and conformity to this Code; (e) identify, manage, and assess risks, including non-compliance risks to this Code; (f) train relevant employees to implement their policies, procedures, and improvement objectives and to meet applicable legal, regulatory, and customer requirements, including conformance with this Code; (g) communicate the requirements of this Code to their employees and suppliers and to monitor their suppliers' compliance therewith; and (h) maintain a complaint mechanism as outlined in Section III of this Code.

Speaking Up and Reporting Concerns

Suppliers should raise questions and any concerns and report to Intuitive suspected violations of the Code promptly. Intuitive's EthicsPoint Hotline ensures a safe, accessible way for suppliers and other stakeholders to report concerns or suspected violations. Managed by an independent third-party organization, the hotline operates 24/7, is available in multiple languages, and allows for anonymous reporting, which may be submitted online or via a toll-free number.

Please visit Intuitive's EthicsPoint website at www.intuitive.ethicspoint.com or go to the [EthicsPoint](#) website.

Suppliers must also maintain a complaints mechanism and process that is free from threats of reprisal, intimidation, or harassment, allowing workers and representatives to anonymously report workplace grievances and violations of this Code, and to promptly investigate all complaints with timely remedies and corrective actions implemented to prevent recurrence. The complaints mechanism must be accessible to any person, including employees and suppliers, guarantee the confidentiality of the person making a complaint, and provide effective protection against reprisals of any kind. Suppliers must also ensure that workers are aware of how to use the complaints mechanism and that they can report concerns without fear of retribution. Suppliers should communicate to Intuitive any complaints received under their complaints mechanism, as well as the steps that they are taking to address the issue.

Monitoring

Intuitive may engage in monitoring activities to confirm a Supplier's performance and compliance to the Code, including on-site assessments, business reviews, supplier quality audits, and the use of third-party monitoring services.



Suppliers acknowledge that Intuitive may conduct on-site audits as required during regular business hours, with reasonable prior notice, and consistent with relevant laws, such as data protection and antitrust regulations. We expect our Suppliers to cooperate during such audits, including by ensuring the availability of relevant employees and officers and by providing requested documentation.

Repercussions for Non-Compliance: Intuitive may take appropriate actions if a Supplier fails to comply with this Code, including:

- Requiring the Supplier to implement corrective and/or preventative measures to address identified non-compliance issues within a reasonable deadline;
- Working with the Supplier to develop a correction plan, including providing relevant training to the Supplier on how to achieve compliance;
- Conducting follow-up monitoring or assessments of the effectiveness of any corrective and/or preventative measure; and/or
- Disqualifying any potential Supplier from consideration or terminate any relationship with a current Supplier.

We expect Suppliers to collaborate with Intuitive in good faith to resolve concerns and drive continuous improvement toward meeting Code requirements. We thank you in advance for your time and commitment toward meeting this objective. Please connect with your Intuitive contact person should you have any questions regarding the Code, expectations and/or best practices for compliance.