



FORT WAYNE METALS

Turning knowledge into solutions.

Code of ethics



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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 by 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 for return for shareholders.

Operating principles

- › **Customers are the focus for everything we do.**
 - › The commitments we make to them must be met. This includes both the quality of our products and the deliveries that we promise.
- › **Continual improvement in processes and products is essential to our success.**
 - › We must continuously strive to improve everything we do: our products, the way our products are manufactured, the way we work together toward our goals, the efficiencies of our operations, and our profitability.
- › **Research and development are keys to the future.**
 - › Because the industries we serve are rapidly changing, we must allocate sufficient resources to develop new products and processes.
 - › We are also committed to supporting our customers' product development through sample orders and research projects.
- › **Employee involvement is critical to improving operations.**
 - › We are a team. We must foster an environment of trust and respect to ensure the greatest contributions from all our people.
 - › The success of our company depends on the commitment of everyone toward our goals.
- › **Integrity cannot be compromised.**
 - › The conduct of our company must be pursued in a manner that is socially responsible and commands respect for its integrity.
 - › Our relationships with our customers, suppliers, and especially ourselves must be based on honesty and mutual respect.
- › **Everyone must be accountable for producing to his/her potential each day.**
 - › We can only accomplish our goals if everyone is focused on their responsibilities each and every day.
 - › To do less is not respecting your coworkers; everyone must participate to reach our potential.
- › **Information must provide the basis for decisions.**
 - › We are creating an innovative culture. We invite many opinions, and all must be heard and respected.
 - › The way to choose which direction must be driven by objective evidence.

Purpose and scope

The purpose of the Fort Wayne Metals Code of Ethics is to communicate our recognition of Corporate Social Responsibility (CSR) and to outline our commitment to operate ethically. As stated in our operating principles, integrity cannot be compromised – **“The conduct of our company must be pursued in a manner that is socially responsible and commands respect for its integrity. Our relationships with our customers, suppliers, and especially ourselves must be based on honesty and mutual respect.”** Our employees are expected to follow Fort Wayne Metals’ values, operating principles, and this Code of Ethics in all aspects of business.

Our decision-making honors our mission, values, and operating principles, and is consistent with the concepts defined in ISO 26000, which states:

- › Social responsibility of an organization for the impacts of its decisions and activities on society and the environment, through transparent behavior that:
 - » Contributes to sustainable development, including health and welfare of society;
 - » Takes into account expectations of stakeholders;
 - » Is in compliance with applicable and consistent with international norms of behavior; and
 - » Is integrated throughout the organization and practiced in its relationships.



Labor

1.1 – Child labor

Employees of Fort Wayne Metals 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

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

1.3 – Workplace

Fort Wayne Metals provides all workers with access to a safe and sanitary workplace including, but not limited to, accessible and clean toilets, safe drinking water, sanitary facilities for food storage, and adequate fire exits. We use our worker health and safety program to address physical, chemical, and biological hazards in the workplace.

1.4 – Equal opportunity and diversity

Fort Wayne Metals provides equal opportunity to all applicants and workers without regard to race, religion, gender, national origin, ancestry, disability, veteran status, sexual orientation, or any other status protected under applicable law. Fort Wayne Metals is focused on creating a diverse and inclusive workforce. We recognize that having a diverse and inclusive workforce increases productivity, morale, and customer and employee engagement.

1.5 – Humane treatment

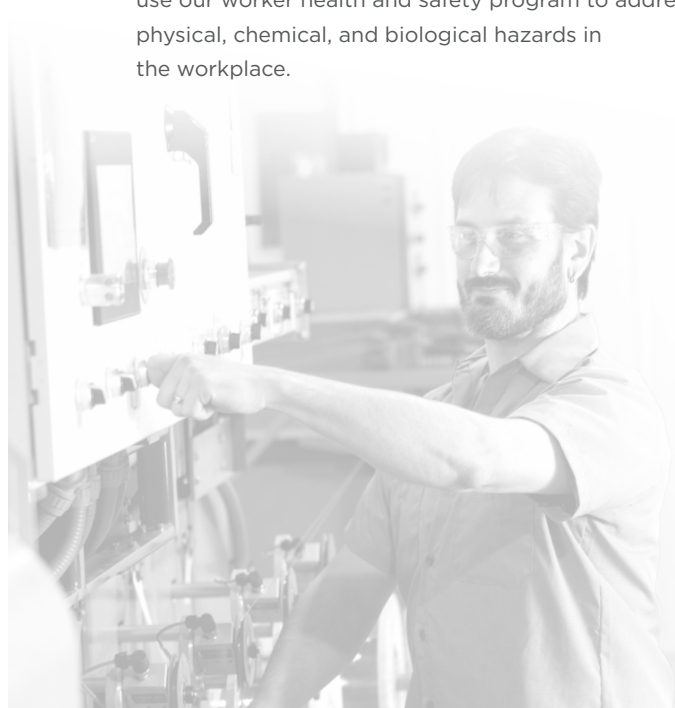
Fort Wayne Metals' employees shall not be subjected to corporal punishment, mental coercion, physical contact, sexual coercion, sexual harassment, verbal abuse or the use of gestures, language, or graphic materials that are threatening, abusive, or exploitive.

1.6 – Work hours and compensation

Fort Wayne Metals complies with applicable laws and standards. Overtime is 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

Fort Wayne Metals provides a safe and healthy working environment. We strive to have 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 and stewardship

2.1 – Regulatory compliance

Fort Wayne Metals complies with all applicable federal, state, and local environmental regulations.

2.2 – Emissions and discharges

Fort Wayne Metals measures and reports, in accordance with compliance requirements for water, land, and air discharges into the environment and works to reduce all emissions.

2.3 – Conservation

Fort Wayne Metals actively works to reduce the consumption of energy, water, and other nonrenewable natural resources.

2.4 – Regulated substances

Fort Wayne Metals has established systems to identify and disclose chemicals in our products and product sub-components that are regulated by the governments and/or competent authorities, considered hazardous, or are of concern to customers. This includes, but is not limited to: REACH, RoHS, Conflict Minerals, Electronic Waste, Packaging, and other regulated substances.

2.5 – Reduce, reuse, recycle

Fort Wayne Metals strives to reduce, reuse, and recycle material within our manufacturing operations. Recycling processes use closed-loop systems wherever possible to achieve maximal use of a material or product. Hazardous waste is properly handled, stored and disposed of in accordance with local regulations.

2.6 – Food and Drug Administration

As Fort Wayne Metals supplies into the medical device industry all products supplied to customers should meet or exceed all quality and product specifications.



Ethical practices

3.1 – Fair dealing

Fort Wayne Metals endeavors to deal fairly with employees, customers, and suppliers in accordance with ethical business practices.

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 complies with all anti-corruption laws and 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, representatives or to any governmental entity, agency, official, or representative.

3.4 – Supplier relations

Fort Wayne Metals buys solely upon quality, performance, suitability of the product or service, availability, and cost. Fort Wayne Metals employees do not accept kickbacks from suppliers.

3.5 – Confidentiality and intellectual property

Fort Wayne Metals safeguards its own and its customers' confidential and proprietary information. In addition, we actively protect and enforce our intellectual property and respect the intellectual property of others.

3.6 – Export compliance

Fort Wayne Metals complies with international trade laws affecting the transfer of goods, services, software, and technology (including embargoes, sanctions, and anti-boycott regulations) as well as applicable U.S. export control laws including, but not limited to, the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR).

3.7 – Whistleblower protection

Fort Wayne Metals prohibits retaliation against any employee submitting a concern related to an activity that they believe may be illegal or dishonest. Employees have the right to remain anonymous and are protected under applicable whistleblower laws.

3.8 – Anti-money laundering

Fort Wayne Metals is committed to performing due diligence, evaluating risk and implementing policies to reduce the opportunity for money laundering throughout our supply chain.



Management

4.1 - Supply chain

Fort Wayne Metals implements practices to encourage its own suppliers meet expectations consistent with those set out in this document.

4.2 - Documentation

Fort Wayne Metals maintains documentation necessary to demonstrate conformance with this Code of Ethics and compliance with applicable laws and regulations. This documentation can be made available for review upon request.

4.3 - Training

Fort Wayne Metals has training programs to ensure an appropriate level of knowledge, skills, and abilities to meet the expectations in this Code of Ethics.

4.4 - Business continuity

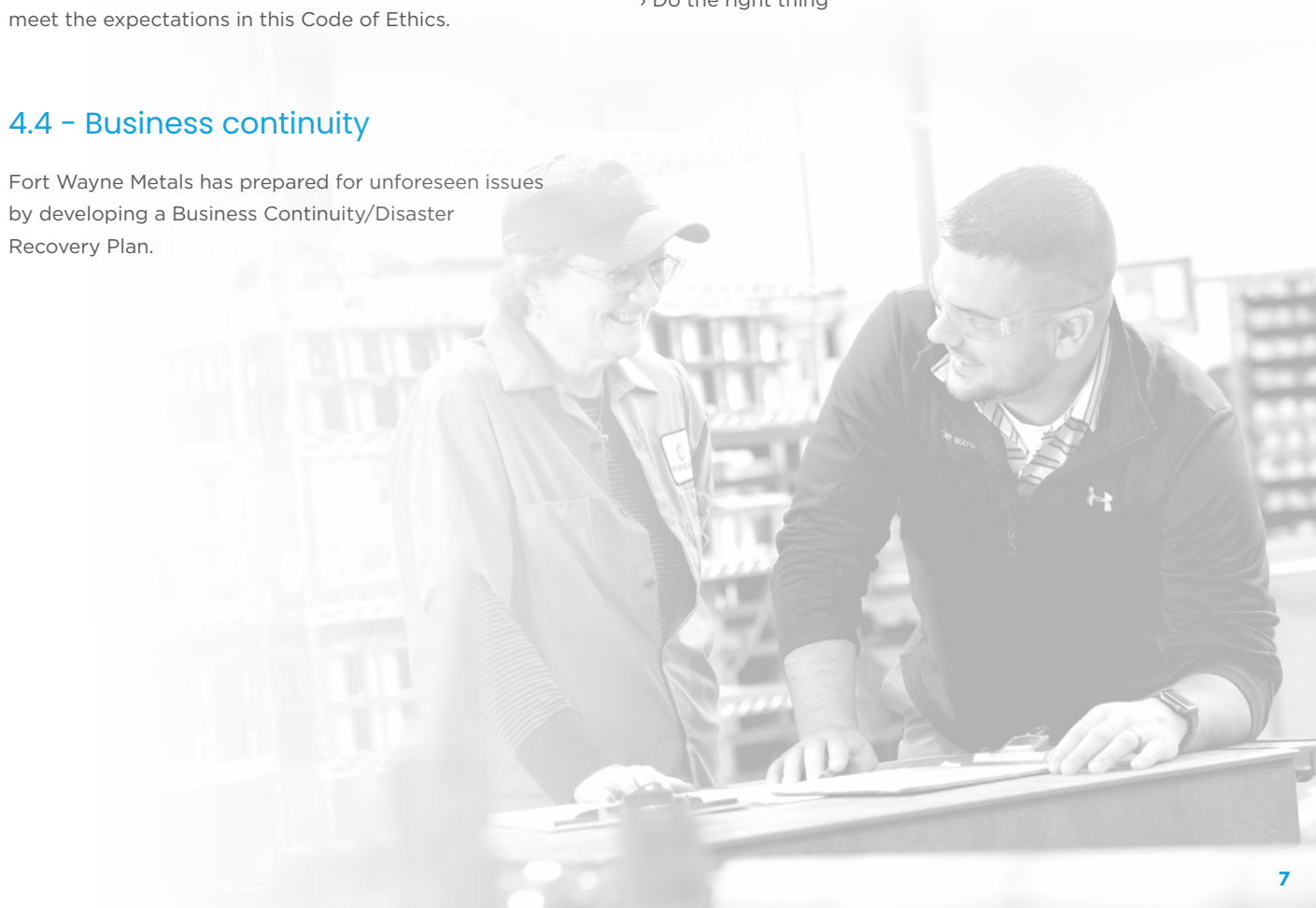
Fort Wayne Metals has prepared for unforeseen issues by developing a Business Continuity/Disaster Recovery Plan.

4.5 - Continuous improvement

Fort Wayne Metals is dedicated to continuous improvement. To support our efforts, we have implemented the "Pulse" lean management system. The Pulse corporate focus areas of People, Innovation, Customer, and Stewardship guide our daily actions.

PULSE IDEAL BEHAVIORS

- › Listen to understand
- › Share knowledge and resources
- › Encourage and recognize others
- › Work collaboratively
- › Go and see
- › Meet commitments
- › Use our goals to guide me
- › Embrace growth and improvement
- › Do the right thing



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

Shanghai, China

Augsburg, Germany

Tamil Nadu, India

Savyon, Israel

Tokyo, Japan

Seoul, Korea

Miami, Florida, U.S.A.

U.S.A. Sales Support

San Mateo, California

Ridgefield, Connecticut

Ruston, Louisiana

Chanhassen, Minnesota

Find your Sales Representative at

fwmetals.com/find-your-rep



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