The American Heart Association ("AHA") strives to comply with all applicable laws, regulations and AHA policies, and is committed to conducting all of AHA's business operations and programmatic activities with the highest standards of ethical conduct. The AHA has created this AHA Global Provider Code of Conduct to clarify the minimum standards by which all vendors, suppliers, distributors, subcontractors, and Government grant sub-awardees ("Providers") are required to conduct themselves when providing goods and services to the AHA. For purposes of this Global Provider Code of Conduct, "Provider" shall include any of its officers, employees, and subcontractors.

## Compliance with Law

Providers shall conduct their business activities in compliance with all applicable laws and regulations.

# Ethics Policy

All forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited. Records prepared for AHA, including records of work time and expenses, must be accurate, truthful and complete, and must meet applicable standards and requirements.

## Financial Integrity

Providers are required to accurately document all contract and grant transactions related to work performed for AHA. The handling and disbursement of funds related to AHA business transactions must be documented and carried out pursuant to a duly authorized written contract with clearly defined procedures. Documents must not be inappropriately altered or signed by those lacking proper authority. No undisclosed or unrecorded fund or asset related to any AHA transaction may be established or maintained for any purpose.

## Conflict of Interest

Providers shall not enter into a relationship with the AHA, including its Officers, Directors or employees that would create a conflict of interest, or the appearance thereof. When an actual, potential, or perceived conflict of interest occurs, that conflict must be disclosed, in writing, by the Provider to the AHA.

## Bribes, Gifts, Entertainment, Favors and Payments

Providers shall not offer, promise, or give any AHA employee, volunteer or agent ("representative") any gifts, payments, services, or any other favors if these would, or might appear to, improperly influence the AHA representative in performing his or her duties for the AHA. AHA employees may not encourage or solicit gifts, entertainment or services from a Provider. Further, Provider shall not provide gifts or anything of value to any employee or representative of a Federal, state or municipal government, or an employee or representative of a foreign government or public international organization.

## Nondiscr imination

## Fair Competition

Providers shall comply with all applicable antitrust and fair competition laws. Accordingly, among other things, a Provider shall not: (i) enter into any agreement, plan or understanding (written or oral), with regard to AHA business, with any of the Provider's competitors relating to price, terms or conditions of sale,

production, distribution, territories, or customers; or (ii) exchange or discuss with any of its competitors pricing, marketing plans, manufacturing costs or other competitive information.

## **Responsible Sourcing of Materials**

Provider shall exercise due diligence on relevant materials in its supply chains. Provider shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high-tisk activities, including severe health and safety risks, as well as negative environmental impacts.

### Acceptable Use

Providers, who have access to AHA's Systems, shall comply with AHA's Acceptable Use Policy.

### **Privacy & Security**

"Personal Information" is defined ind (eig) 56 (n )]T 0 Tov3ifa08 0 Td [(. )-77.4 (s)-56.5 (af)-1214 (nal)-26.7 ()-J 0 Tc 0 Tw

#### Labor and Human Rights

AHA believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and AHA providers shall uphold the highest standards of human rights.

#### Anti -Discrimination

Provider shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices. Provider shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety and shall not improperly discriminate based on test results.

#### Anti -Harassment and Abuse

Provider shall commit to a workplace free of harassment and abuse. Provider shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

#### Prevention of Involuntary Labor and Human Trafficking

Provider shall ensure that all work is voluntary. Provider shall not traffic persons or use any form of

# Intellectual Property and Obligations of Confidentiality

AHA respects the intellectual property rights of others and expects Providers to respect AHA's intellectual property rights. Providers must appropriately safeguard AHA confidential information, and may not use AHA proprietary information without written permission. Similarly, in the course of working with or for AHA, Providers must not use proprietary information of third parties without appropriate authorization.

## International Transaction s (as applicable)

Providers conducting business on behalf of the AHA outside of the U.S. and its territories shall also comply with the following standards:

### Anti -corruption Laws

Providers must be in compliance with, and shall not violate, the

## Provider Diversity P rogram

The AHA is committed to provide a business environment that values diversity among its vendor base with Providers who consistently provide quality and timely services and products at competitive prices. The AHA is committed to involve minority and women-owned businesses in purchasing opportunities.

The Procurement Services Department at the AHA's National Center maintains a database of current and potential Providers. The Department assists in providing sourcing information to AHA departments and facilitates the purchasing and sourcing process. The Procurement Services Department assists in the