

Code of Conduct



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A Message from Payman Khales

President and Chief Executive Officer



Dear Associates,

At Integer, our success is built on a shared commitment to our Values and Essentials - the principles that guide how we work, how we make decisions, and how we treat one another every day. These are not just words. They define our culture, shape our actions, and determine the trust we earn from our customers, partners, and each other, which ultimately enables us to realize our vision of improving the lives of patients around the globe, one device at a time.

At the center of everything we do is **Integrity - doing the right things and doing things right**. Our Code of Conduct serves as a practical guide to navigating the decisions and situations we encounter in our work in a way that reflects this essential.

But having a Code is not enough. It is only meaningful when we actively live it.

Each of us has a responsibility to understand the Code, apply it in our daily work, and seek guidance when something is unclear. No Code can anticipate every situation. That is why we rely on your judgment, your commitment to our values, and your willingness to pause and ask questions when something doesn't feel right. At Integer, asking questions is not just encouraged, it is expected.

Equally important is our responsibility to speak up. Living our value of **Candor** means being open and honest with each other. And living our value of **Accountability** means taking responsibility for behaviors and outcomes. If you see or hear something that may violate our Code, our policies, or the law, I ask you to **Raise the Flag**. By doing so, you protect our people, our reputation, and the trust placed in us by our customers, partners and, ultimately, patients. We are committed to maintaining an environment where associates feel comfortable raising concerns without fear of retaliation and where every concern is treated seriously and respectfully.

Being an ethical company requires all of us - across every role, function, and location - to act with honesty, accountability, and courage. Thank you for your commitment to doing the right thing. With your dedication to our Vision and Mission, demonstration of our values and our essentials, and commitment to the Code, we will continue to build a culture defined by integrity and a future of continued growth and industry leadership.

A handwritten signature in black ink, appearing to read 'Payman Khales', with a stylized, flowing script.

Payman Khales
President and CEO

Integer Vision, Mission, Values and Essentials

Our Vision, Mission, Values and Essentials are clear and simple. Together, they set the tone for our culture and ethical behavior as well as form the solid foundation upon which our Code of Conduct is built.

Our Vision

Improving patients' lives around the globe, one device at a time.

Our Mission

Advance the goals of our medical device customers through industry-leading engineering and manufacturing, with a relentless commitment to quality, service, and innovation.

Our Values

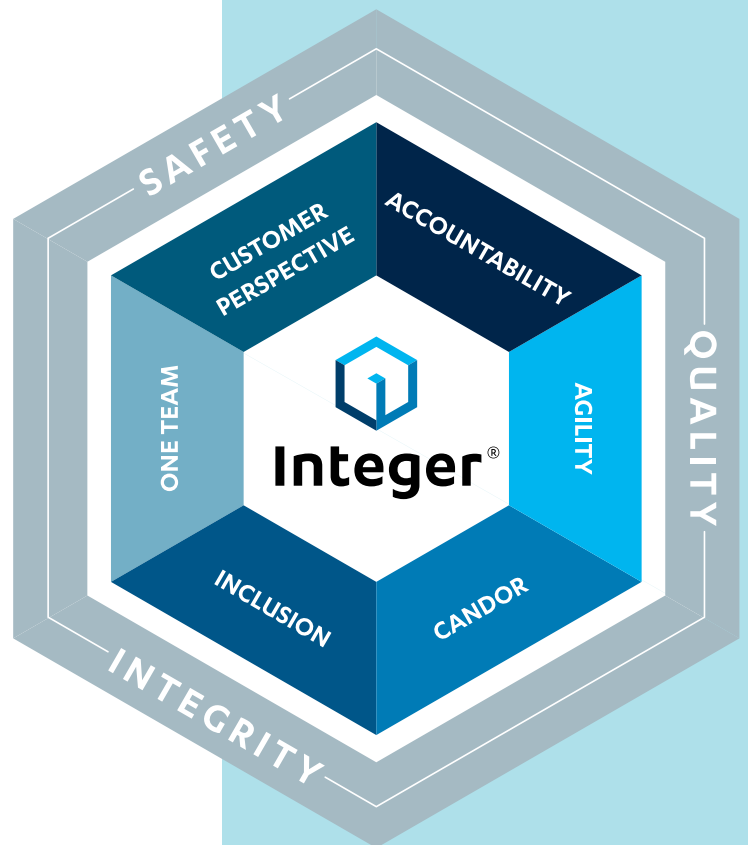
Our Integer Values are the operating principles that guide how we conduct ourselves in the workplace and how we interact with each other, our customers and our suppliers. We are focused on delivering exceptional results from **our Customers' Perspective, succeeding as One Team through Accountability, Agility, Candor and Inclusion**

- **CUSTOMER PERSPECTIVE** - We think from our customers' view
- **ACCOUNTABILITY** - We own our actions and results
- **AGILITY** - We move with speed and embrace change
- **CANDOR** - We are open and honest with one another
- **INCLUSION** - We always interact with others respectfully
- **ONE TEAM** - We only win together

Our Essentials

Our Essentials - Safety, Quality and Integrity - are non-negotiables, and fundamental to everything we do.

- **SAFETY** - We prioritize safety in every action
- **QUALITY** - We deliver with precision every time
- **INTEGRITY** - We do the right things and do things right



Purpose of the Code

At Integer, you are part of a team that is dedicated to creating innovative technology that transforms lives. Our vision defines our corporate purpose, and simply, why we come to work. Our Code of Conduct (our “Code”), aligned with our vision and values, guides us on how we should act at work. Our Code serves as a living resource for you in support of day-to-day decision making. Our Code represents the core of how we create a solid foundation of trust and success that is reflected in our relationships with customers, suppliers, stockholders and each other. The Integer Code is applicable to all associates, officers and directors. We will use reasonable efforts to ensure that temporary associates, contractors and consultants, as well as anyone we authorize to act on Integer’s behalf, are compliant with our Code.

Our Code establishes the basic foundation of Integer’s ethics as it:

- Communicates our ethical philosophy and commitment to all associates, customers, other stakeholders and the communities in which we do business.
- Obliges us to comply with laws, regulations and company policies.
- Ensures that integrity and ethics are maintained in all business relationships.
- Serves as a resource when questions of legal or ethical appropriateness arise – not as a comprehensive rulebook, but rather a statement of how we commit to do business.
- Encourages ethical decision-making and discussions to improve how we deal with concerns we encounter every day at work.
- Sets the foundation for our existing policies and processes.

It’s up to each of us to uphold the highest standards of integrity and set the example for expected workplace behaviors. Integer expects you to follow both the spirit and the letter of the Code in all company matters, which means you should:

- Understand the Code and seek advice when you need clarification. Understanding the Code is a mandatory part of your job.
- Conduct business ethically and act in accordance with our vision, values and the Code.
- Follow the applicable legal requirements of all countries and locations in which we do business.
- Speak up if you have concerns or suspect violations of the Code, laws, regulations or Integer policies.

Connect with the Code...

- Read, understand and comply with the Code.
- Seek help if you have questions about the Code.

“Your name is your reputation.”

– Wilson Greatbatch



This Code does not cover every issue or situation you may encounter at the company. Use our Code as a guide in addition to other Integer policies and procedures. You are expected to use good judgment and seek guidance if you need clarification. Integer has many resources to assist you with clarifying your understanding and addressing your questions; some of those resources include your managers, Internal Audit, Legal and Human Resources departments.

As a global company, our Code applies everywhere we do business, subjecting our company to the laws and regulations specific to those locations. All associates, and those acting as agents on behalf of the company, must respect and comply with our Code, Integer policies and procedures, and with applicable laws and regulations in the countries, states, counties and cities and any other jurisdiction in which Integer conducts business. In some regions, local laws, regulations or business requirements may be stricter than the policies set forth in this Code. In those cases, we expect you to follow the local laws, regulations or business requirements. In those instances where the Code appears to be in violation of an applicable law or regulation, that law or regulation will supersede the Code. Please bring any discrepancy between the Code and any law or regulation to the attention of the Human Resources or the Legal department.

In addition to being bound by all provisions of our Code, the CEO and the Chief Financial Officer (CFO) and other senior financial officers performing similar functions (collectively, the “Senior Financial Officers”) are subject to a separate policy (Code of Ethics for Senior Financial Officers POL-000081) which is posted on the Integer website.

We are committed and accountable to our Code. However, for those who choose to violate our Code, disciplinary actions, up to and including potential termination of employment or other appropriate consequences, may be taken for associates as well as non-associates in accordance with local laws. The disciplinary action given upon a violation of our Code will depend on the type of violation and the severity of the violation. Where violations of our Code are also in violation of a law, you may be subject to other legal liability.

Waivers of the Code of Conduct

While we ensure that we comply with the practices contained in the Code, situations may arise where exceptions may need to be considered. If you believe that a waiver is appropriate, you should first contact your manager. If your manager agrees that an exception seems appropriate, a written request shall be submitted to the company's General Counsel. General Counsel must approve any waiver from the Code for an associate. Any waiver of the Code for executive officers or directors may be made by the board of directors or a committee of the board of directors. Only those directors not involved in the possible waiver may approve waivers of the Code for directors and executives; any such waivers must be promptly disclosed as required by law or regulation.

Voicing Your Concern

We each have a responsibility to promptly raise concerns of known or suspected violations of the Code, laws, regulations or company policies. This level of accountability and effective communication is expected from you, and it protects our company from illegal or unethical misconduct, preserves our reputation as our customers' partner of choice, and ensures that we clearly value our customers and, ultimately, the lives of patients and those that our products and services impact every day.

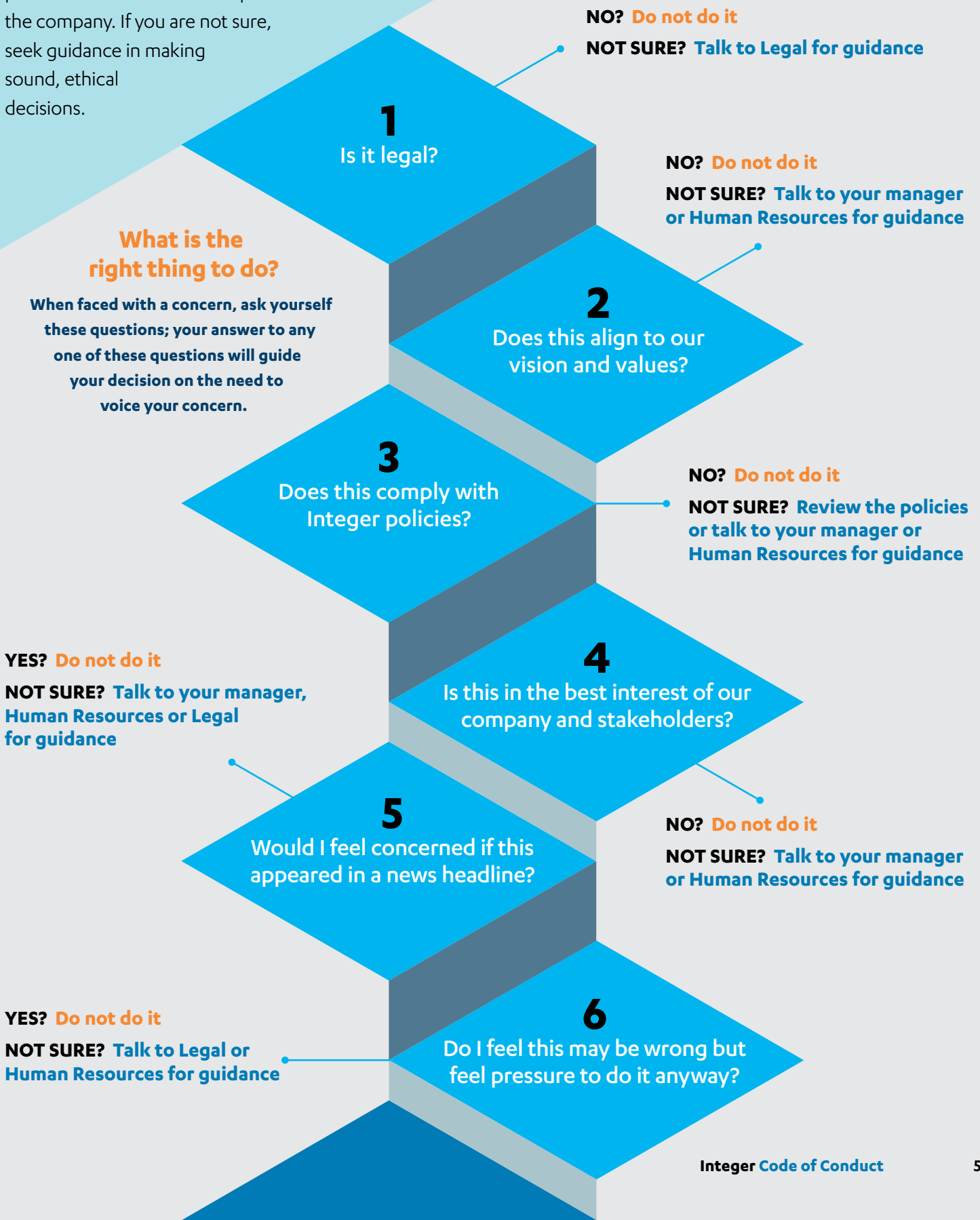
Q The different laws are so complicated and cover so many different areas, how can I be sure that I won't violate some little technicality? Moreover, how am I supposed to understand it all?

A Don't abandon your own judgment. If something seems intuitively wrong to you, ask before acting. You are expected to understand the finer points of the rules governing your job. Do not hesitate to contact your manager, a member of management, Human Resources or Legal if you need clarification of the laws, standards and policies.



Decision Tree

A decision tree can be a useful tool when you are faced with a difficult situation. Ask yourself these questions. In most situations, proceeding with the wrong path can have serious consequences for the company. If you are not sure, seek guidance in making sound, ethical decisions.



Integer Direct Line



Speak Up!

It's the right thing to do.

The most effective and efficient method to resolve concerns is internally, through two-way conversation with your manager or members of the leadership team including, for example, Human Resources. Often our managers and local leadership teams are closest to the issue and can respond quickly to your concern. The most appropriate method for raising your concern may depend on the issue, the people involved, and local and geographic laws and regulations. We understand that, at times, and for reasons that may be very personal to you, you may need an anonymous method of reporting a concern. In most countries, the Integer Direct Line allows you to submit a concern anonymously. The Direct Line is a toll-free hotline hosted by a third party.



Talk privately with your supervisor, HR department or any manager of your choice



Hable en privado con su supervisor, con el departamento de Recursos Humanos o con cualquier gerente de su elección.



Führen Sie ein persönliches Gespräch mit Ihrer/Ihrem Vorgesetzten, der Personalabteilung oder einer beliebigen Führungskraft Ihres Vertrauens



RAISE THE FLAG

If you observe any unethical behavior or potential violations of compliance, safety, security, and/or policy, please use the following resources:

INTERNAL RESOURCES



Talk privately with your supervisor, HR department or any manager of your choice



Send a confidential e-mail at: compliance@integer.net

EXTERNAL & ANONYMOUS RESOURCES



www.integerdirectline.ethicspoint.com



Scan code to submit a web report



Call the Integer Direct Line Number:
In the United States call: 855-846-6576



Direct Line website:

You may also report your concern online through the website www.IntegerDirectLine.ethicspoint.com.

Call the Direct Line:

From the United States, the Direct Line is accessed by dialing 1-855-846-6576. For all other countries, dial as directed in the table at right.

Contact Legal/Ethics and Compliance Directly:

Send an email:
Compliance@Integer.net

Country	Country Toll-Free Access Code
Costa Rica	To report issues by phone, go to www.integerdirectline.ethicspoint.com and follow the Click Connect by Phone instructions on the homepage.
Dominican Republic	849-944-5632
Ireland	1-800-456812
Malaysia	1-800-81-1349
Mexico	800-880-1470
Switzerland	0-800-800-179
United States	1-855-846-6576
Uruguay	000-405-4081

Compliance Investigations



Once a concern is reported, each report is reviewed and a determination made whether to further investigate or, what, if any, action is appropriate. Integer will conduct investigations promptly and thoroughly in accordance with local laws. All investigations are conducted with integrity, discretion and impartiality, ensuring fairness and confidentiality. You are expected to cooperate fully and candidly in any investigation. When legally possible, we will share with you the status of the investigation and when it is resolved. Please do not conduct your own investigations as such actions could compromise the integrity of the company's investigations.

Our Commitment to Non-retaliation

We are committed to non-retaliation and maintaining confidentiality within the limits of the law for those who report concerns by any method. Integer will not discipline, discriminate, take any adverse employment action or retaliate against anyone who reports a concern in good faith, whether or not such information is ultimately proven correct. This commitment extends to anyone who cooperates in any investigation or inquiry regarding such conduct. That said, intentionally submitting false or misleading allegations might harm the reputation of an associate or the company, which not only demonstrates a lack of respect for your colleagues but is a serious offense. You must ensure this does not happen.

We are committed to non-retaliation and maintaining confidentiality within the limits of the law for those who report good faith concerns by any method.



Good faith means you earnestly believe there is a sincere concern, and it is not something malicious or false.



Sarah complains to her manager that the machine she is working on is unsafe and needs repair. Her manager brushes off her concerns. Soon after, her manager transfers her to another position in a different department. Sarah believes this is in retaliation for reporting a safety concern. What should Sarah do?



If Sarah believes she is experiencing retaliation for reporting a concern, she should immediately contact Human Resources or site management.

Living our Vision and Values

Integer leaders have the ability to strongly influence the culture of their teams and encourage others to “do the right thing,” enabling us to live our vision and values to the fullest.

The actions of Integer leaders must clearly demonstrate our commitment to our values, promoting an environment where compliance is expected and ethical behavior is the norm. Leaders, by virtue of their positions of authority, must be role models. An important part of a leader’s responsibility is to exemplify our values and exhibit the highest standards of integrity. Leaders must:

- **Act with honesty and fairness.**
- **Create an open-door environment where associates feel comfortable asking questions or voicing concerns without fear of retaliation.**
- **Make sure your direct reports understand and follow the Code, laws, regulations and company policies.**
- **Communicate the seriousness of our company’s expectations for ethical conduct.**
- **Hold everyone accountable for making sound, ethical decisions.**
- **Support associates who, in good faith, raise concerns or cooperate in investigations.**
- **Be alert to any situations or actions that may be unethical or potentially damaging to our reputation.**
- **Take prompt action and raise any concerns or suspected violations of the Code, laws, regulations or company policies.**

Diversity and Inclusion

At Integer, we value the individual differences and similarities our associates bring to work. We actively cultivate an inclusive environment that leverages these unique characteristics to improve patient lives and drive business success. In an increasingly competitive global market, we will achieve success when we attract and retain the best talent that reflects and connects with the diverse needs of our customers and patients. It is the inclusion of these differences

that fosters innovation, better solutions, stronger customer relationships, and positions us to build a stronger Integer.



Integrity:

We do the right things and
we do things right.



Our Commitment to Each Other

Equal Opportunity Employer

At Integer, we take our responsibility as an equal opportunity employer seriously. We are committed to maintaining a work environment free from discrimination — one where all associates are treated with dignity and respect. All associates are expected to contribute to an environment where we behave in accordance with any equal opportunity laws or regulations in the locations where we operate. In addition, we uphold local laws to provide reasonable accommodations for qualified individuals with disabilities.

If you believe your rights have been violated or if you have any other workplace concerns, you should consult your manager or another member of management or call Human Resources or the Integer Direct Line.

Q Sometimes my manager favors certain associates with overtime and good job assignments. I think I am being discriminated against. What should I do?

A You should discuss your concerns with your manager or another member of management. Let your manager know that you feel you are not being treated fairly in terms of job assignments and overtime. Give him or her specific examples. If you feel uncomfortable approaching your manager with your concern, you should inform another member of management or contact Human Resources. In all cases you should report your concern as soon as possible.

Harassment-Free Environment

You have the right to work in an environment free from harassment. Harassment in the workplace will not be tolerated regardless of whether the harasser is a co-worker, manager, customer, vendor or visitor. Harassment includes any behavior (verbal, visual or physical) that:

- Impacts or influences wages, hours, working conditions or other terms and conditions of employment.
- Is based on race, color, religion, creed, sex, gender identity, sexual orientation, age, disability, national origin or ancestry, citizenship, marital or veteran status, political or trade union membership, and family and medical leave status, or any other status protected by your country's laws.
- Creates an intimidating, offensive, abusive or hostile work environment.

Sexual harassment means any harassment based on someone's sex or gender. It includes harassment of a sexual nature (such as unwelcome sexual advances or requests for sexual favors) as well as harassment that is not sexual in nature (such as offensive remarks based on perceived non-conformance with gender stereotypes). Harassment can be committed by a person of the same or opposite sex as the victim. The Integer Anti-Harassment, Non-Discrimination and Non-Retaliation Policy, or local policies and laws, provide clear direction as to how complaints of harassment will be investigated and resolved. As is the case with any violation of the Code, you have a responsibility to report any harassing or inappropriate behavior promptly so that Integer can take appropriate action. Retaliation because you made a complaint of harassment or discrimination or assisted in an investigation will not be tolerated. If you believe that you or someone else has been subjected to conduct in violation of this policy, you should immediately report the offending behavior to your manager or another member of management, Human Resources, or contact the Integer Direct Line.

Q A co-worker in my department often makes "jokes" about certain ethnic groups. I find these "jokes" insulting and demeaning, but I am afraid to confront him. What should I do?

A Jokes or slurs directed against certain groups of people because of the color of their skin, their country of birth or even their accent are not acceptable in our workplace. Tell your co-worker that you find these jokes offensive. If the jokes don't stop, you should report the incidents to your manager or a member of management or your Human Resources department.



Harassment will absolutely not be tolerated at Integer.

Our Commitment to Each Other

Workplace Environmental Health, Safety and Security (EHS&S)

Integer provides a safe and healthy workplace and promotes environmental excellence in our operations. Integer complies with government legislation, regulations and accepted industry standards.

Each of us is responsible for maintaining a safe, healthy and environmentally friendly workplace. The health and safety of each of us and our visitors is top priority, and we must constantly focus on preventing workplace injuries, illness and environmental releases by:

- Complying with all Integer EHS&S policies and procedures, as well as environmental, health and safety regulations for our operations and our products.
- Conducting ourselves and all activities in a safe and environmentally responsible manner.
- Demonstrating the company's commitment to preventing injuries and illnesses by proactively inspecting our workplace, correcting and continuously improving conditions that may create a risk to personal injury or adverse environmental impact.
- Report all workplace injuries, near-misses or environmental concerns as soon as reasonably possible after the incident occurs, but in no event later than leaving at the end of your day, or within 8 hours, whichever is shorter.
- Coaching, providing feedback and actively engaging with our peers to promote safe and environmentally friendly activities.



Maintaining a Secure Environment

Each of us is responsible for keeping our facilities secure. Violence or threats of violence are strictly prohibited. We commit to never:

- Make or send harassing or threatening remarks, calls, emails or other verbal or written communications to anyone.
- Stalk any other person.
- Destroy personal and/or company assets.

Dangerous items of any nature, such as weapons, explosives or firearms, are not permitted on company property or in your possession while conducting Integer business off-site. Promptly follow your site's protocols and contact EHS&S, Human Resources or your manager if you observe any inappropriate or dangerous behavior. Any violations of these guidelines for maintaining a safe environment are grounds for disciplinary action, up to and including potential termination in accordance with local laws.

You should ensure our facilities are secure at all times. This means you should not allow anyone entry to an Integer facility who does not have proper security access (ID badge swipe, keypad code, etc.). If a person is following you and they do not have the proper security access, instruct them to go to the designated reception area. All visitors must enter the facility via the designated reception area and sign a visitor log. All associates and visitors must wear the properly designated Integer identification badge while in Integer facilities.



Report suspicious individuals on our company property to EHS&S.

Substance Abuse/Drug and Alcohol-Free Workplace

Integer is committed to providing associates with a safe and productive work environment by eliminating the hazards to health and job safety created by alcohol and drug abuse. Integer requires you to work free from the influence of any substance, including drugs and alcohol, which may prevent you from conducting work activities safely and effectively. Additionally, Integer prohibits associates from consuming or being in possession of illegal or unauthorized drugs or alcohol during work hours, or while on Company property. We commit to live our values by showing up each day ready to focus on creating innovative, quality solutions for our customers, while being able to effectively and respectfully communicate with our teammates. Working under the influence, consuming, or being in possession of any substance jeopardizes our performance and behavior, with the potential to negatively impact our company, customers and even our communities. Integer reserves the right to have any associate tested, where local law and policies allow, if there is reasonable suspicion that he or she is under the influence of drugs or alcohol. If you are using prescription or non-prescription drugs that may impair alertness or judgment, witness an associate consuming illegal drugs or alcohol, or witness an associate who may be impaired and, therefore, possibly jeopardizing the safety of others or Integer's business interests, unless prohibited by local laws, you should report it immediately. We encourage anyone who may have a substance abuse problem to seek assistance.

Please refer to the Company intranet to further review any local drug and alcohol or intoxicants policies that may pertain to you. If you have questions about your role in supporting our commitment to maintaining a drug and alcohol-free work environment, please contact Human Resources.

Q Some of my coworkers went out to lunch at a local restaurant. They had an alcoholic drink with their meal and then came back to work. Is this appropriate?

A No. Associates are prohibited from reporting for work or remaining on duty under the influence of alcohol. The consumption of alcohol at any time during work hours or while performing work is prohibited, whether on or off company property.

Associate Information Privacy

General Data Protection Regulation (GDPR) Policy POL-000003

We respect the privacy of our associates and former associates and have taken steps to safeguard personal and confidential information that we are required to obtain for legitimate business or legal purposes. Access to personal associate information, such as personnel information and medical records, is strictly limited by company policy and all country and government privacy laws and regulations.

You may have the right to access your own personnel or medical information, but not access the files or records of others unless authorized to do so, in compliance with state and country laws. While Integer respects your privacy, the company does reserve the right to inspect our facilities and property, in compliance with local laws and policies, such as computers, telephone records, lockers, emails, files, business documents and workplaces. You should not expect privacy when using company-provided services or equipment.

Q What is personal, private information?

A Personal, private information is generally any data that can be used to identify a specific individual, including your name, date of birth, government identification number or other personal identifiers.

Proprietary and Confidential Information

In carrying out Integer's business, we do so with integrity. That's especially important when during the normal course of business you may become aware of confidential or proprietary information about the company, our customers/suppliers, prospective customers/suppliers or other third parties. Confidential or proprietary information includes any nonpublic information concerning our company, or third parties, that might be of use to competitors or harmful to Integer or our customers or suppliers if disclosed. You must maintain the confidentiality of all company, or third party, information entrusted to you. The obligation to preserve confidential information continues even after you are no longer employed by Integer.

You must take care not to inadvertently disclose confidential information. Materials that contain confidential information – such as memos, notebooks, computer disks, flash drives and laptop computers – must be stored securely. Safeguard confidential information by:

- Ensuring that conversations involving confidential information are not overheard in public places.
- Always using secure networks.
- Protecting mobile devices from theft.
- Ensuring that electronic communications and file sharing are secured at all times, especially when accessing in public spaces or sharing proprietary files or communications.

You should take appropriate precautions to ensure confidential or sensitive business information, whether proprietary to Integer or another company, is not generally openly communicated within the company or outside the company.

You must honor all lawful obligations to former employers. These obligations may include restrictions on the use and disclosure of confidential information learned or obtained during an associate's former employment, restrictions on recruiting former colleagues to work at Integer and non-compete agreements.

Nothing contained in this Code shall be construed as limiting any associate from disclosing confidential information to the extent such disclosure is required by law, or to a court or government agency to the extent an associate has a protected right to do so.

Q A former Integer associate who worked on my team recently contacted me to request that I provide copies of some project materials we worked on together during his/her employment. During this conversation, I learned that this former associate possesses copies of several Integer documents containing important Integer data. I told this associate that I would get back to him. What should I do now?

A Do not, under any circumstances, provide copies of the requested materials, as they may contain confidential Integer, or third party, information. Moreover, the former associate may have breached his/her obligations to protect confidential information under our nondisclosure agreement, which still applies after the associate has left, by taking confidential information. Finally, there might be other issues for Integer if this former associate has used or revealed this information to others. Contact your manager immediately, who will, in turn, alert the Legal department to determine what, if any, action should be taken to protect Integer's, or third party's, confidential information and property.

Connect with the Code ...

- Preserve confidential information.
- Maintain compliance with non-disclosure agreements during and after employment.

Our Commitment to Our Company

Intellectual Property

Integer's intellectual property ("IP") is one of our most valuable assets. IP includes patents, trademarks, copyrights, trade secrets and know-how. You must manage IP with the same degree of care as any other valuable asset. When our IP is not identified or otherwise protected, we risk losing the rights to our property and the competitive advantages it offers. We protect these assets by obtaining patents, trademarks and trade secret protection. Further, we are committed to vigorously protecting these assets and, when appropriate, taking legal action to enforce our IP rights.

It is our policy to not knowingly infringe upon the IP rights of others. Patent infringement, unauthorized copying, trade secret misappropriation and unauthorized disclosure of confidential information of third parties are illegal activities and, if proven, would have serious consequences to Integer. You are required to report any suggestions or accusations, informal or formal, made by third parties that Integer has committed any acts of IP infringement to a member of management, Human Resources, or the Legal department.



Protect our intellectual property; it is one of our most valuable assets.

Q What if someone outside of Integer sends me an unsolicited idea regarding a potential new product?

A Unsolicited ideas from outsiders may be intellectual property of such individual/entity. Do not review unsolicited information; forward it along to Integer's Legal department.

Protecting our Physical Assets and Resources

You are a steward of Integer's assets. You have the obligation to protect and preserve our company's assets and resources and ensure their efficient use as well as to assist our company in its efforts to control costs. Theft, carelessness and waste have a direct impact on our company's profitability. Our company assets include, but are not limited to, such things as electronic mail, computer systems, documents, equipment, facilities, materials and supplies. Any use of these assets for purposes other than Integer business is to be avoided, although reasonable, personal use of company assets such as our telephones or copy machines, are permissible from time to time. Personal use of company-provided electronic mail is permitted if it conforms to Integer's policies and local laws and does not interfere with your job performance or that of others. Any suspected incident of fraud, theft, embezzlement or misappropriation of company property must be reported immediately to our EHS&S department for investigation. You must ensure that the company's assets and resources are not used for personal financial gain. What constitutes misuse of our company assets and resources? How do I know if personal use of our company assets and resources crosses the line of reasonableness? *The following examples are provided as illustrative of misuse:*

- Any use of our company facilities or equipment for personal gain.
- Excessive use of phones or fax capabilities for personal purposes.
- Taking office supplies or equipment for personal consumption or use at home, e.g., including the use of company equipment to repair personal property.
- Personal use of company vehicles without express authorization.
- Unauthorized copying of computer software programs.
- Use of a company-issued credit card(s) for personal purchases.
- Theft of any kind.

Q I have seen another associate stealing supplies from our company. The person is a friend of mine, but I don't like the fact that he is stealing from the company. What can I do?

A It is a difficult situation for you, but you owe it to yourself and to the company to let management, EHS&S or the Human Resources department know what is happening. And remember, you may always call the Integer Direct Line if it is in accordance with local laws. See page 6.



Information Technology Equipment

IT Acceptable Use Policy POL-000028

Integer provides an array of information and technology resources intended to maximize our efficiency in performing our jobs such as: email, computers, networks, the internet, the intranet, cell phones, telephones and voicemail systems. These tools are company property and must be used in a professional manner. Occasional, limited personal use of these resources is permitted, but cannot interfere with your work performance or that of your colleagues.

Q May I use our company issued equipment (computer, devices, etc.) to send personal messages to friends and family?

A Yes. While use of our computer networks, including email and texts, is primarily for business purposes, limited personal use is allowed if it conforms to Integer's policies and does not interfere with your job performance or that of others. Remember that company email and texts are not private. We reserve the right to review emails and texts sent over our networks/systems/devices without notice to you in compliance with local laws and policies. If your message is highly personal or confidential, you should not send it using Integer's computer systems.



Never give your password to someone else so they can gain access to any of your computer files or documents.

Maintaining Accurate Records

Accurate and reliable records are crucial to our business. We must ensure that the accounting and financial records of our company meet the highest standards of accuracy and completeness. Reporting accurate, complete and understandable information about our business, earnings and financial condition is an essential responsibility of each associate. We are committed to maintaining accurate company records and accounts to ensure legal and ethical compliance and to prevent fraudulent activities. We are responsible for ensuring that the information we record, process and analyze is accurate and recorded in accordance with applicable legal and accounting principles. We also must ensure that our records are secure and readily available to those with a need to know the information on a timely basis. Company records include:

- Payroll
- Timecards
- Quality records of all types
- Travel and expense reports
- Emails
- Accounting and financial data and records
- Measurement and performance records
- Electronic data files
- Data held by third-parties
- All other records maintained in the ordinary course of our business



Our Commitment to Our Company

All company records are expected to be complete, accurate and reliable. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. All records are the property of Integer and should be retained in accordance with our policies. We do not destroy official company documents or records before the retention time expires. We do destroy documents, in accordance with applicable law, when they no longer have a useful business purpose and their retention time has expired.

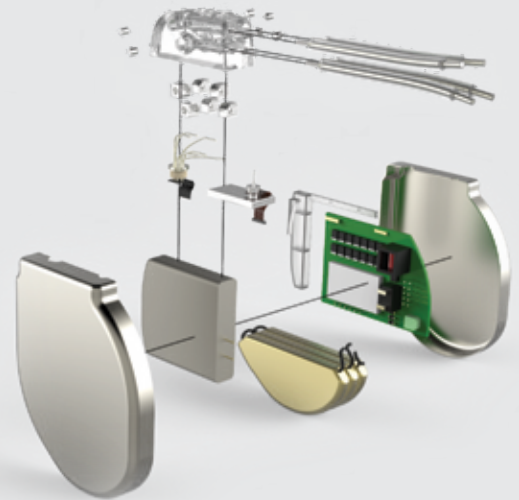
Investors count on us to use and provide accurate information so they can make informed investment decisions. The following activities are not allowed:

- Maintaining undisclosed or unrecorded funds or assets for any purpose.
- Making, or asking others to make, false or misleading entries on an expense report, time sheet or any other report.
- Giving false quality or safety results.
- Recording false sales or recording sales outside of the time period they actually occurred.
- Understating or overstating known liabilities and assets.
- Delaying the entry of items that should be current expenses.
- Hiding the true nature of any transaction.
- Providing inaccurate or misleading information for company benefit programs.
- Entering into "side deals" with customers that are not properly recorded or disclosed on our books or records.

Any document you prepare or sign must be correct and truthful. We rely on you to come forward if you feel you are being pressured to prepare, alter, conceal or destroy documents in violation of our company policy. In addition, you must report if you believe someone has made a misleading, incomplete or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.



Do not destroy company records to cover up an error.



Accounting and Auditing Matters

If you believe a questionable accounting or auditing matter may be occurring within the company, you can communicate your concerns by following the instructions provided on page 6.

The Audit Committee of the Board of Directors will evaluate the merits of all concerns or questions received and authorize follow-up actions, as it deems necessary or appropriate, to address those concerns.

Q I'm concerned about reporting a suspected fraud. What if I am wrong and it gets me in trouble or I hurt someone's reputation?

A We do not hold associates accountable for reports made in good faith, and commit to non-retaliation, even if they turn out as not substantiated. We are careful when looking into alleged wrongdoing to protect associates' reputations. Investigations are conducted with integrity and respect in an objective, fair and confidential manner. We encourage you to talk to your manager first to help decide the best course of action.

"The reward is in the doing, not in the results."

— Wilson Greatbatch

Avoiding Conflicts of Interest

We expect all associates to conform to the highest ethical and legal standards and refrain from any activity or personal interest that might appear to be a “conflict of interest.” A conflict of interest occurs when a personal interest interferes, or appears to interfere, with the interests of the company as a whole. A conflict of interest can arise whenever you take action, or have an interest that interferes with your performance of company duties or responsibilities. You should never use, or attempt to use, your position at the company to obtain an improper personal benefit, or for the benefit of a family member, or any other person.

The way you behave in our business relationships impacts our reputation and the trust we maintain with our stakeholders. By discouraging and avoiding conflicts of interest, we send a clear message about our commitment to integrity and our determination to do what is right. We require you to proactively and promptly disclose actual or perceived conflicts of interest.

Each of us must identify potential conflicts of interest or the appearance of conflicts of interest when they arise and bring them to the attention of your manager or a member of management, Human Resources or Legal departments to ensure a fair and prompt resolution. If you are considering undertaking any activity that might create an appearance of a conflict, you must disclose the activity in advance to your manager and discuss with the Human Resources or Legal departments when applicable.

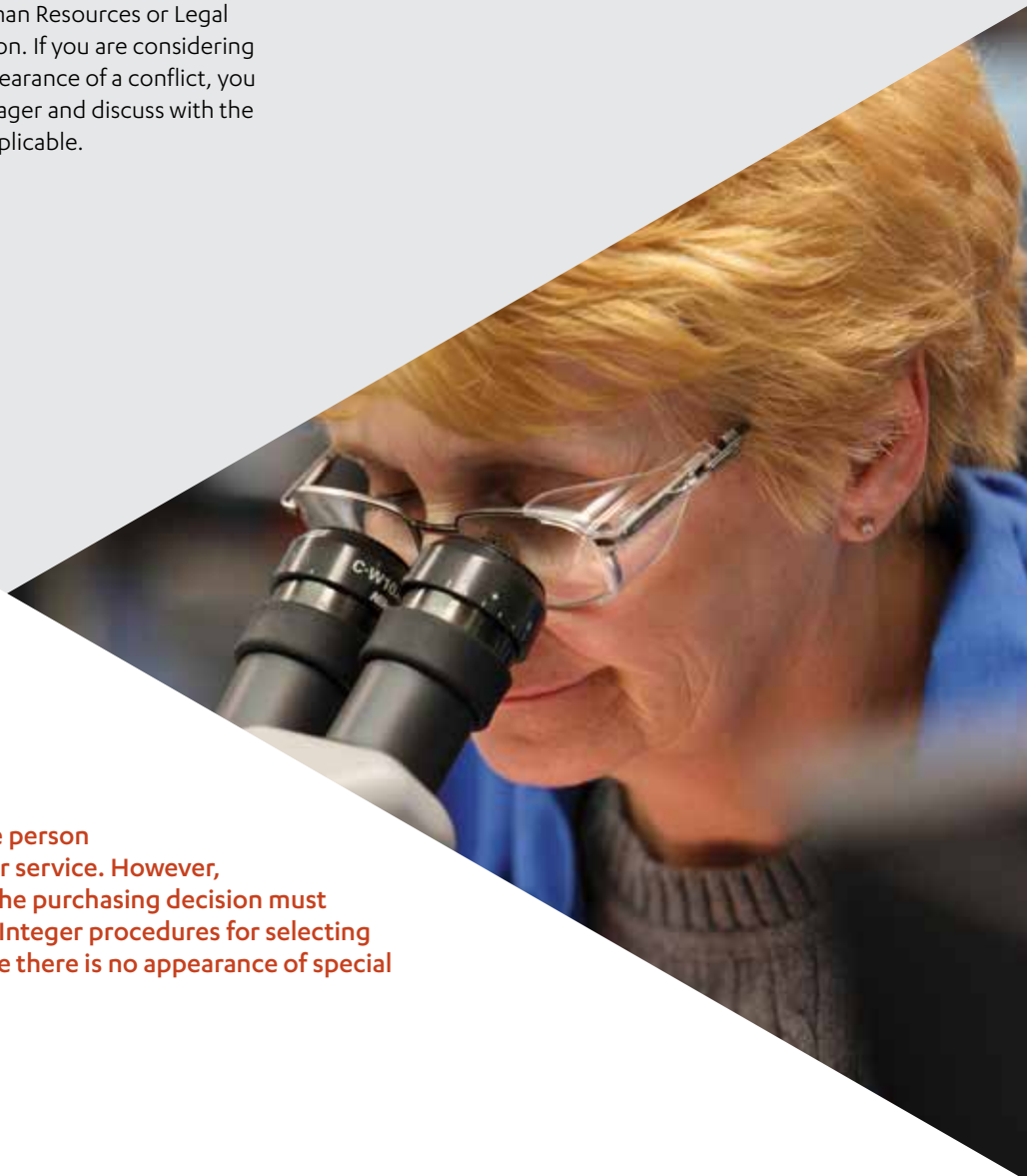


Remember ...

Failing to report a potential conflict of interest may be a violation of our Code. When in doubt, seek guidance from your manager, Human Resources or Legal department.

Q My brother owns a business and wants to be an Integer supplier. May I direct him to Integer Supply Chain?

A Yes. You may direct your brother to the person who may be interested in his product or service. However, your manager and the person making the purchasing decision must be told about the relationship. Normal Integer procedures for selecting a vendor must be followed to make sure there is no appearance of special treatment for your brother.



Our Commitment to Our Company

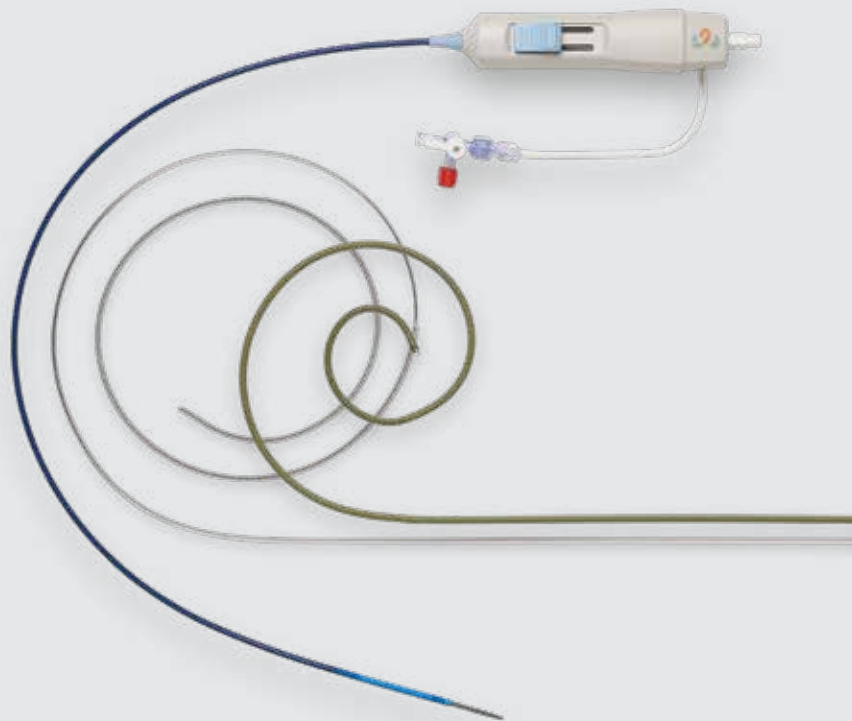
Although it is not feasible to describe every situation that could give rise to a conflict of interest, here are some activities that should generally be avoided:

- Holding a financial interest in a direct competitor unless such financial interest is less than 1 percent of the outstanding equity of that competitor.
- Using your position within the company to influence any supplier or customer in which you have a personal or financial interest.
- Using your position within the company to secure loans or guarantees for personal benefit beyond standard business terms.
- Holding a second job with a supplier or competitor, or a job that interferes with the ability to perform your job responsibilities at Integer.
- Engaging in outside employment or business ventures if that activity competes against Integer, provides goods or services to Integer, or violates your confidentiality or other obligations to Integer.
- Hiring personnel of, providing consulting services to, or serving on the board of directors of a competitor, customer or supplier (excluding volunteer activities wholly unrelated to the company's business interests).
- Hiring a supplier, distributor or other agent managed or owned by a relative.
- Soliciting or accepting cash from any supplier or customer.
- Encouraging the receipt of gifts, entertainment, hospitality or other benefits from any supplier or customer; and only accepting items if they are modest in value and in compliance with local laws and policies.
- Soliciting or accepting of any gift or other benefit when an obligation to the donor is stated or implied.
- Using company resources, personnel, time or facilities for personal gain.
- Exploiting a business opportunity that is discovered through the use of company property, information or position to which the company might reasonably be entitled to be interested in without first making the opportunity available to the company.
- Serving on the board of directors of an organization may present a conflict of interest. Before agreeing to become a member of a board of directors, contact the Legal department to determine the relationship, if any, exists between our company and the organization.

Consensual Relationships:

In order to minimize the risk of conflicts of interest and promote fairness in the workplace, Integer prohibits romantic relationships between a person in a management or supervisory position with an associate whom he or she directly supervises or whose terms and conditions of employment he or she may influence (for example, promotion, termination, discipline or compensation). Associates are expected to promptly disclose to Integer management any such relationships where they exist or whenever they come into existence. All reporting relationships are subject to review by Human Resources to determine whether there is a potential for a conflict of interest. Failure to disclose such a relationship may result in disciplinary action of the manager or supervisor, up to and including termination of employment.

We all have a duty to Integer to advance any legitimate interests should the opportunity arise. You should not take personal advantage of opportunities or favors offered to you by virtue of your employment with Integer.



Insider Trading

See Policy on Avoidance of Insider Trading & Related Procedures for Securities Transactions

Our company shares information openly with you. At times, you may receive confidential company information before it is made publicly available to investors. Information is considered non-public if it has not been adequately disclosed to the public. Information is not considered public until the second business day after it has been disclosed to the public. Some of that information may be considered significant, or “material,” and could be important to an investor deciding to buy, sell or hold securities, such as Integer stock. You must not use confidential information for personal benefit, to trade securities based on material, non-public information or provide inside “tips” to others, including family and friends.

Examples of information that could be material are:

- Information about possible business deals, such as a merger, purchase, sale or joint venture.
- Financial results or changes in dividends.
- Important management changes.
- Major raw material shortages or discoveries.
- Significant product or manufacturing process developments.
- Gain or loss of a significant customer or supplier.
- Major lawsuit or regulatory investigation.
- Any other information that may positively or negatively affect the stock price of Integer or any other company.

To assess if you have material or confidential information that you should not share or act upon, you should ask yourself:

- Would a reasonable investor consider the confidential information to be important when making an investment decision?
- Would the public disclosure of the information be reasonably expected to affect the price of Integer’s stock?

You may purchase and sell Integer stock, exercise options granted or transfer stock into or out of Integer stock funds in any company savings plan or other benefit plan when you are not in possession of any material, non-public information. Consult with your manager or the Legal department if you are unsure whether you have material, non-public information at any point in time. To avoid the appearance that you may be trading on material, inside information, do not trade in Integer securities during quarterly and other blackout periods when such restrictions apply to you. Even if you are not covered by formal blackout restrictions, you are encouraged to wait until at least 48 hours after material, non-public information has been publicly disclosed before trading to ensure the market has had an opportunity to absorb and evaluate the information. To the extent any questions arise, consult with the Legal department prior to making any trades in Integer securities. The violation of insider trading laws is a serious crime and can result in significant civil and criminal penalties.

Q I overheard in the cafeteria that Integer is planning to acquire another large company. Can I buy or sell Integer shares or shares or options of the other company?

A No. The fact that you were not specifically given the information to do your job doesn’t matter. The prohibition against trading applies to any information you obtain regardless of how you obtained it.



Refrain from buying company stock after obtaining confidential information about our financial results.



Interaction with Health Care Providers

Needs Assessment HCP Consultant Engagement Policy POL-000062 Federal Anti-Kickback Statue Policy POL-000065

At Integer, we are focused on our customers' success. As a result, we rely on collaborative relationships with Health Care Professionals ("HCPs") to develop quality, innovative and beneficial medical devices and technologies. A HCP is any individual or entity directly or indirectly involved in the delivery of health care services or items to patients and that can purchase, lease, prescribe, recommend, use or arrange for the purchase, lease or use of the company's products.

We are firmly committed to complying with all laws and regulations governing our interactions with HCPs. To further our commitment with HCPs, Integer associates in the United States follow the AdvaMed Code of Ethics on Interactions with Health Care Professionals. Several other countries adopted similar industry codes of ethics related to interactions with health care professionals (e.g., AMID of Mexico, MedTech Europe Code of Business Practice) and Integer associates are expected to become familiar with these codes before initiating interactions with health care professionals.

Interactions with HCPs should always be professional in nature and facilitate the exchange of medical or scientific information that will benefit patient care. You must never engage in conduct that unlawfully induces (or appears to unlawfully induce) anyone to purchase, lease, recommend, use or arrange for the purchase, lease or use of Integer products. The company may compensate HCPs for consulting services, performing research, participating on advisory boards or performing other bona fide services for which a legitimate need has been identified and for which the company pays fair market value, provided such arrangements are made in writing and approved in accordance with the company's relevant contract approval policy.

To ensure the appropriate focus is on an educational and/or informational exchange and to avoid the appearance of impropriety, you must never provide, arrange or pay for entertainment or a recreational event/activity for any HCP.

Physician Payment Sunshine/Transparency Laws

Federal Transparency "Sunshine Law" Reporting Policy POL-000062

Certain countries, such as the United States (Physician Payments Sunshine Act) and France (French Sunshine Act or Bertrand Act), have enacted transparency laws designed to provide patients with transparency into certain financial relationships between physicians and medical device companies. Integer is committed to complying with and meeting the reporting requirements of these laws. It is important to note that these laws neither prohibit industry-physician collaboration nor prohibit payments or transfers of value. Rather, these laws require the tracking and reporting of certain transfers of value resulting from these interactions. If you interact with healthcare providers or teaching hospitals, or process payments related to these interactions, you are required to be trained on these transparency laws and our related compliance policies. Refer to Integer's Federal Transparency ("Sunshine Law") Reporting Policy for more information.

Q What are the penalties, under the US Physician Payments Sunshine Act, for failing to report a payment made to a physician or teaching hospital?

A Depending on the circumstances, noncompliance with the Sunshine Law's reporting requirements could subject the company to financial penalties of up to \$10,000 for each payment or transfer of value not reported and up to \$100,000 for each incident of "knowingly" failing to report.



Sunshine Laws require the tracking and reporting of certain payments or transfers of value from medical device companies to physicians and/or teaching hospitals.

Gifts, Gratuities and Business Entertainment

Gifts are sometimes offered by customers, suppliers or others as a gesture of goodwill or for public relations or local customary purposes. You must not accept or give any gifts, gratuities or other favors to/from any customer, supplier or other person doing, or seeking to do, business with Integer other than in accordance with company policy and your country's customs and norms. Gifts must not violate any anti-corruption or anti-bribery laws. The occasional acceptance of items in excess of norms may be justified if refusal would cause undue embarrassment or strain on the business relationship.

Common sense, moderation and applicable law should prevail in business entertainment on behalf of the company. You may provide or accept business entertainment to or from anyone doing business with the company only when that entertainment is infrequent, is customary and reasonable, and intended to serve legitimate business goals.

The AdvaMed Code of Conduct includes prohibitions related to providing gifts and entertainment to Health Care Providers. Please consult the Code section on Interaction with Health Care Providers for further details.

Q I received a gift from a customer, but I am unsure of its value. How do I know I need to disclose it to my manager?

A For very modest items, you do not need to consult your manager unless others might believe such receipt could influence your business decisions. Use your best judgment to estimate the value of the gift you received and the need to seek appropriate approval. If you have any doubt about an item's value or its implications to an actual or perceived conflict of interest, discuss the situation with your manager.

Gifts for Government Officials

Specific laws apply to interactions between government officials and employees. For example, the United States and other countries have strict laws that prevent providing anything, including food or beverages, to a government employee or his/her family. You must ensure that you do not give any kind of illegal gift to a government official or employee of a government-owned enterprise. When conducting business with government agents, employees or officials, be sure that you do so with integrity while understanding the applicable laws as well as local customs and norms. Discuss with the Legal department any such gifts or proposed gifts.

Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate. Money laundering is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose Integer and individuals to severe penalties. Integer forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

Connect with the Code ...

- Accept modest gifts using good judgment.
- Do not accept gifts if they could influence your business decisions.

Our Commitment to Regulators

Antitrust and Fair Competition

We believe in free and open competition. In addition, in most of the countries where we operate, strict laws similar to antitrust laws in the United States and competition laws in the European Union prohibiting unfair business behavior restricting free competition, are in force. These laws are quite complicated, and failure to adhere to these laws could result in significant penalties imposed on both Integer and the associates who violate the law. It is our policy that all directors, officers and associates comply with antitrust and competition laws.

Q During a dinner break at an industry conference, someone who works for one of our competitors mentioned that his company was considering increasing prices because of certain industry pressures. Everyone knows that our company is also experiencing these same pressures. Is it OK for me to discuss our pricing plans?

A No. You may never discuss pricing with a competitor. This prohibition applies equally to learning the competitor's pricing practices or plans (other than from publicly available information) and to revealing those of Integer. As soon as you realize that a competitor is starting to raise this subject, you should break off the discussion, even if it means walking out in the middle of a meal. You should then immediately report what happened to the Legal department.

Anti-Corruption/Anti-Bribery

Anti-Corruption Policy POL-000007

Integer is committed to complying with applicable anti-kickback, anti-bribery and anti-corruption laws in all countries in which we operate and conduct business. As a company registered in the United States, Integer is subject to the strict requirements of the U.S. Foreign Corrupt Practices Act ("FCPA") and all other relevant laws and regulations against bribery and corruption including, but not limited to, the U.K. Bribery Act.

We stand on the firm foundation of our value of integrity — and will not permit corrupt acts or payments as a means to gain or retain business for or on our behalf — even if that means losing or walking away from a business transaction. Specifically, Integer prohibits its directors, officers, managers, associates and all third parties retained by the company from engaging in any corrupt activity and/or directly or indirectly offering, promising, providing or authorizing anyone to improperly provide money or anything of value to a foreign government official (or any private individual or entity) for the purpose of obtaining or retaining any improper advantage.

Who are foreign government officials?

Foreign government officials include federal, state or local government employees (low level or high ranking), political candidates, members of political parties, and even employees of government-owned enterprises, such as nationally or state-owned medical facilities. Government officials may include health care providers employed by government or state-run hospitals, among others.

It is important to remember that we cannot engage a third party to make a corrupt payment that we are not allowed to do ourselves! We could be liable for violating anti-corruption laws even if we did not know, but should have known, that an agent, distributor or other third party acting on our behalf was giving a foreign government official an illegal payment.

What are examples of improper payments?

Improper payments can take many different forms and can include such things as:

- Cash
- Gifts
- Meals
- Entertainment
- Travel and lodging
- Personal services
- Charitable donations
- Business opportunities
- Favors
- Offers of employment

Import, Export and Anti-Boycott Laws

U.S. Export Management and Compliance Program MAN-000102

Integer is committed to full compliance with all laws and regulations applicable to conduct our business. Among these laws are those that:

- Regulate exports of products, software and technology.
- Regulate business with countries, entities and individuals that are subject to embargoes or sanctions.
- Discourage or prohibit furthering or supporting boycotts imposed by foreign countries that are not sanctioned by the United States.

Each associate involved in international business transactions must understand the basic elements of such laws and comply with them at all times. You should know how to recognize situations with export or import control implications, and then seek guidance any time you are not completely familiar with how to comply with all applicable laws and regulations. We might need to obtain a license before exporting certain products or technology or before a Foreign Person can visit or begin working at one of our export controlled sites. We might be restricted from posting technical information on the internet or sending it by email to a citizen of another country or even a co-worker. In other cases, local law might prohibit a sale altogether. You cannot avoid these obligations by using a third party who would ship the company's products to a destination that would otherwise require an export license. Compliance with these laws is a critical component of the company's reputation and success.

The U.S. government controls exports of sensitive equipment, software and technology as a means to promote U.S. national security interests and foreign policy objectives. In some instances, a license may even be required to export or re-export Integer products or components. Most Integer products and technology can be exported to many destinations without a license. However, conducting business within certain countries or the exporting of certain "Defense Articles" (products, components or parts designated for use in military/national defense) and/or "Dual-Use" items (military/commercial application) or related transfer of technology may require a license prior to shipment or transfer.

Q An agent approached me with an opportunity to export products to a new Middle East market where we do not yet have sales. He has many contacts and is willing to handle all shipping and selling logistics. How should I proceed?

A Before shipping products across borders, consult with the Legal department to help. Review the export and import laws of the countries involved and set up a plan for compliance. Find out whether the countries or parties involved are subject to any trade restrictions and conduct proper due diligence on your agent and the customer involved.

What is a boycott?

A boycott is an act of voluntarily abstaining from using, buying or dealing with a person, organization or country as an expression of protest, usually for social or political reasons.

Commitment to Quality

Quality Policy QMS-000003 (4, 5, 6)

Medical devices and components are subject to detailed regulations worldwide, which are predominantly in place to assure end user/patient safety, and, as such, you have a responsibility to understand and fully adhere to all quality and regulatory requirements applicable to your role. These include, but are not limited to, Good Manufacturing Practices (GMP), Good Documentation Practices (GDP), design controls, labeling, marketing controls and manufacturing process controls. The company is committed to an open and constructive relationship with all regulators.

The reputation and success of Integer is built upon our regulatory systems and infrastructure as well as our commitment to produce the highest-quality, most innovative medical devices, components and services in the industry. We are committed to this because it is consistent with our steadfast focus on serving our customers, the health care providers who use our medical devices, and the patients who depend on us for life-changing therapies. Integer's commitment to quality assures that each of us is empowered and responsible to:

- Take ownership for fully comprehending and carefully following all applicable procedures related to our work.
- Utilize the quality system to identify opportunities for improvements in these procedures and in everything we do.
- Take pride in our work and be vigilant regarding attention to detail.
- Take appropriate action whenever we are concerned about quality.
- Continue to make Quality a top priority.

Integer's Quality manual provides more information about our quality and regulatory policies and procedures.

Q I have an idea that I think can reduce scrap and improve the quality of the part I am working on. What should I do?

A Each of us is responsible for quality and proactively raising ideas for continuous improvement to management. You should feel confident in communicating and sharing your ideas with your manager.

The graphic features the Integer logo at the top left. The title 'Quality Policy' is prominently displayed in the center. To the right, a text box explains the company's commitment to quality, emphasizing that quality is owned by all employees through daily activities and decisions that prioritize the patient. Below this, a bulleted list outlines four key areas of focus: developing and improving products and services, creating and maintaining effective systems, following the systems created together, and proactively managing risk. At the bottom right, logos for Greatbatch Medical, Lake Region, and ELECTROCHEM are displayed.

Integer®

Quality Policy

At **Integer** we **All** own **Quality** through our daily activities and decisions that prioritize the patient by...

- ▶ Developing & improving products, processes & services with clinical and technical expertise;
- ▶ Creating and maintaining effective systems to meet Quality, Regulatory, Customer & Business requirements;
- ▶ Following the systems we have created together;
- ▶ Proactively managing risk to the patient or the business.

Greatbatch Medical
Lake Region
ELECTROCHEM

Our Commitment to Our Customers

Third-Party Relationships

In the course of doing business, Integer partners with third parties to secure goods and services. Before engaging, Integer ensures that a third-party partner shares our commitment to value, quality, suitability, performance, service, technology and price. Proper procurement conduct includes:

- Using established corporate-wide or leveraged agreements.
- Obtaining competitive bids when leveraged agreements do not exist.
- Confirming the financial and legal status of the supplier.
- Verifying quality and service claims on a regular basis.
- Making sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment, the applicable rate or fee and terms of payment.
- Verifying that invoices clearly and fairly represent goods and services provided.
- Avoiding reciprocal agreements or exchange of favors.
- Following all established procedures governing supplier development, approval and ongoing management.

Our company only uses suppliers who commit to:

- Never supplying unsafe products or services.
- Never violating laws or regulations.
- Never using child labor or forced labor.
- Never using physical punishment to discipline employees, even if it is allowed by local law.

Protecting Customer/Supplier/Third-Party Information Privacy

Keeping customer/supplier information secure and using it appropriately is a top priority for our company. You must safeguard any confidential information or contracts that our customers/suppliers or third parties share with us. You must also use such information only for the reasons for which the information was gathered, unless further use is allowed by law. Customer/supplier or third-party information includes any information about a specific customer/supplier or other third party, including such information as name, address, phone numbers and financial information. You must not disclose any information about a third party without their written approval unless legally required to do so (for example, under a court-issued subpoena).

Q I just received a call from a government agency requesting information on one of our customers. Should I provide the requested information?

A You should contact the Legal department before providing any information about a customer to a third party. Our company always seeks to cooperate fully with law enforcement investigations, but you must also take into account certain additional considerations and the potential liability to a customer for providing information beyond that which is appropriate under the law.



Our Commitment to Our Customers

Obtain Competitive Information Fairly

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice; doing so helps us stay competitive in the marketplace. You must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows and information publicly available on the internet. You may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) by obtaining a license to use the information or actually purchasing ownership of the information. When working with consultants, vendors and other partners, ensure they understand and follow Integer's policy on gathering competitive information.

Government Customers

When doing business with country, federal, state or other government officials, you must ensure all statements and representations to government procurement officials are accurate and truthful, including costs and other financial data. If an assignment directly involves contact with a government agency or representative, or if you are responsible for someone working with the government on behalf of Integer, be alert to the special rules and regulations applicable to our government customers. You must take additional steps as needed to understand and comply with these requirements. Avoid any conduct that could appear improper when dealing with government officials. Integer does not allow payments, gifts or other favors to be given to a government official or employee, as such practices may appear to be a means of influence or a bribe. Failure to avoid these activities may expose the government agency, the government employee, our company and you to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state or local government entity must be in accordance with company policy.



Q The mayor of our town is coming to visit our location. May I provide a gift bag including Integer logo items?

A Many local officials are prohibited from even accepting a cup of coffee. Consult with the Legal department before preparing any type of gift for local officials.

Our Commitment to Our Community

Environmental Stewardship

As a global company with diverse operations, managing our environmental impact is complex yet imperative to ensure a sustainable environment for years to come. We are committed to reducing our impact through effective stewardship programs that encourage energy-efficient technologies, decreased use of natural resources and overall reduction of harmful effects from our products and processes. Associates are trained on applicable areas of environmental compliance in terms of laws, regulations and facility-specific requirements. Associates are expected to comply with these requirements to ensure all Integer business is conducted in a way that is protective of the environment.

Human Rights and Fair Labor Practices

Anti-Human Trafficking Policy POL-000018

Employment of Young Persons Policy POL-000093

At Integer, we pride ourselves on being a company that stands on our values and operates with integrity. We are committed to upholding fundamental human rights and believe all human beings around the world should be treated with dignity, fairness and respect. Our company will only engage suppliers and direct contractors who demonstrate a serious commitment to compliance with human rights laws. Integer promotes human rights by following applicable labor laws. We do not allow child or forced labor. We follow all applicable wage and hour laws and regulations in every country in which our company is doing business.

No one under the age of 18 shall be employed unless such employment is in compliance with all applicable country laws and regulations concerning age, hours, compensation, and internal review of health and safety requirements.

Social Media

Social Media Policy POL-000094

The company encourages the open exchange of ideas, discussion, learning and collaboration, in line with our vision and values. Though social media provides forums for these types of communication, each of us must be mindful of, and manage, what we communicate in these public forums. Each of us is personally responsible and accountable for the content we post on social media. Social media use should not interfere with work commitments or job responsibilities. You must ensure you do not post content that would violate our Code or company policies or intellectual property, or that includes the use of any company copyright, logo or trademark without prior written consent.

A general rule to remember when using social media is to think about the impact of statements you make. Keep in mind these transmissions are permanent, easily transferable and can affect our company's reputation and relationships with coworkers and business partners. When using social media, do not make comments on behalf of Integer without proper authorization. Also, you must not disclose our company's confidential or proprietary information about our business, our suppliers or our customers.

Investor and Media Inquiries

Only designated Integer spokespeople are authorized to speak with the media, investors and industry analysts on behalf of our company, in accordance with local laws. Unless authorized, do not implicitly or explicitly give the impression that you are speaking on behalf of Integer in any public communication, including posts to online forums, social media sites, blogs, chat rooms and bulletin boards. This policy also applies to comments to journalists about specific matters related to our businesses, as well as letters to the editor and endorsements of products or services.

If you receive a request to speak to a journalist or comment on Integer activities in a public forum on behalf of Integer, contact the Communications team. Any investor inquiries should be directed to Investor Relations.

Political Activities and Contributions

You are free to contribute your personal time to support a candidate or organization of your choice, however, your involvement must not be on company time. You are not allowed to use company funds or assets to contribute to a political party, candidate or campaign, unless the activity is lawful in the country involved and approved by the appropriate business Vice President.



Doing the Right Thing

Building a culture of ethics and integrity is foundational in enabling our ability to execute for the business, our customers, fellow associates, shareholders and, ultimately, patients. Our values and our Code set high expectations for ethical behavior. Living this culture each day provides us benefits:

- **We protect our associates, customers and patients.**
- **We ensure our reputation and brand are upheld.**
- **We prevent losses and reduce risk.**
- **We improve engagement and productivity.**
- **We help to avoid prosecution.**

Each of us commits to do the right things and to do things right. It also means reflecting on our decisions. “Did I do the right thing?” and “Was there a better option?” are questions you should often ask ourselves. In situations where you are not sure, talk to your manager or the Human Resources or Legal department. They want to hear from you and for you to be heard.

Education and Training

The proper education and training of Integer associates and our representatives is a significant element of an effective compliance program. Integer is committed to the education of its company representatives on issues related to corporate compliance. This Code is available to each new associate, officer, director and consultant of the company upon starting employment or other relationship with the company, and is available on the company’s intranet and external website.

Training sessions explaining this Code may also be provided as a part of new associate orientation or as separate sessions, with the opportunity to ask any questions to ensure all aspects of the Code are understood. Each associate, officer and director will be required to, country permitting, certify that he/she has received, read and understands the Code and will comply with its terms. Periodically, associates will be required to recertify, country permitting, that they remain familiar and in compliance with the Code.

The company reserves the right to amend, alter or terminate this Code at any time.

This Code does not constitute a contract of employment between the company and any individual associate, officer or director or consultant.



“It’s imperative that employees truly feel a part of the company as well as a sense of security. Treat them right and the collective energy gained will ultimately show up on the bottom line. Short-term thinking where employee well-being is concerned produces short-term results.”

–Joseph Fleischhacker Sr.



*“The word **integrity** evolved from the Latin adjective **Integer**, meaning whole or complete. In this context, integrity is the inner sense of ‘wholeness’ deriving from qualities such as honesty and consistency of character. It means acting according to the values, beliefs and principles we claim to hold.”*

Our Culture of Ethics and Integrity

Our Foundation

Throughout our history, we have had many transformational leaders – including Wilson Greatbatch, Joseph Fleischhacker Sr. and Albert H. Mainwaring – from our legacy companies that now make up Integer. They are our history and our firm foundation. Each of their rich, innovative contributions influence who we are today and who we will be as we find ways to create a better tomorrow. As we follow in the footsteps of these trailblazers, let us continue to lead the way in our industry with innovation, inclusion and integrity as one Integer.



Albert H. Mainwaring founded Uniform Tubes in a barn on his family's property in Pennsylvania. The fledgling company's first product was precision metal tubing for shielded communication cable.



Both Albert H. Mainwaring and Joseph Fleischhacker Sr. – engineers by training and entrepreneurs by spirit – desired to build companies that would endure.



Joseph Fleischhacker Sr. founded Lake Region Manufacturing in a chicken coop behind the Fleischhacker family home in Minnesota.



Wilson Greatbatch's original workshop.



Dr. Orestes Fiandra was part of the surgical team that implanted the world's first externally powered pacemaker designed by medical pioneer Dr. Rune Elmqvist. In 1960, Dr. Fiandra, with surgeon Dr. Roberto Rubio, successfully implanted the Elmqvist device in a patient in Uruguay, becoming the first successful long-term pacemaker implant and the first in the Americas. In 1969, Dr. Fiandra would form Centro de Construcción de Cardioestimuladores de Uruguay (CCC), specializing in the design and development of medical devices.



Wilson Greatbatch was building a heart rhythm recording device for the Chronic Disease Research Institute in his laboratory at the University of Buffalo. At one point, he reached into a box of parts for a resistor to complete the circuitry. The one he pulled out was the wrong size, and when he installed it, the resulting circuit it produced emitted intermittent electrical pulses much like those associated with a heartbeat. This formed the basis for Wilson's subsequent design for the first implantable pacemaker.





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