

California Transparency in Supply Chains Act of
2010
The Modern Slavery Act 2015 United Kingdom
The Cooper Companies, Inc. Statement¹

The California Transparency in Supply Chains Act of 2010 (SB 657) went into effect on January 1, 2012. The Act requires retailers and manufacturers above a certain size to disclose efforts undertaken to prevent possible slavery and human trafficking in their supply chains. The disclosure is intended to provide information to consumers, allowing them to make informed choices about the products they buy and the companies they support.

The UK Modern Slavery Act 2015 creates offences and imposes a duty on businesses supplying goods and services in the UK to report each year on the steps they have undertaken to ensure their operation and supply chains are free of human trafficking and slavery. Other countries have similar laws and requirements. This disclosure is also intended to outline the actions Cooper is taking to tackle the risks of human trafficking and slavery in our business and supply chain.

The Cooper Companies, Inc. together with its subsidiaries (collectively “Cooper”) is committed to supporting human rights globally within our own organization and within its external supply base. Cooper expects its suppliers to comply with all applicable regulations and laws. Cooper fully supports the intent of California's and the UK's laws and opposes human trafficking and slavery in all forms.

Company Structure and Supply Chain

The Cooper Companies, Inc. (“TCC”) is a global medical device company, listed on the New York Stock Exchange. TCC is headquartered in San Ramon, California USA, with over 12,000 employees worldwide and products sold in over 100 countries. TCC subsidiaries include CooperVision (CVI) and CooperSurgical (CSI). CVI manufactures products at Cooper’s own facilities and through external partners and distributes contact lenses and contact lens products; and CSI provides medical devices, pharmaceutical, testing and procedure-based solutions to the women's healthcare segment.

Our Policies

The following policies are relevant to monitor and reduce the risk of modern slavery occurring within our business or its supply chains:

- this Statement;
- Supplier Code of Conduct;
- Cooper’s Ethics and Business Conduct Policy (especially the Ethics, Compliance and Personal Responsibility and the Violations of the Policy sections of the policy); and

¹ This statement sets out the steps taken by The Cooper Companies and its subsidiaries, including CooperVision Manufacturing Limited, CooperVision Limited, CooperVision (UK) Holdings Limited, CooperVision Lens Care Limited, Sauflon CL Limited, CooperSurgical Holdings Limited and Research Instruments Limited.

- Cooper’s other policies and standards referenced in policies above. (collectively the “Cooper Policies”)

Due Diligence and Risk Assessment

As part of our initiative to identify, assess and mitigate risks:

- i. Cooper uses a risk-based assessment process for evaluating, verifying and selecting direct suppliers.
- ii. Cooper expects all of its suppliers to abide by all applicable laws and regulations and maintain the highest ethical standards.

Supplier Agreements, Supplier Code of Conduct

In its supply agreements, contracts, purchase orders and other arrangements (collectively the “Supplier Agreements”) with its direct suppliers, Cooper includes provisions requiring such direct suppliers to comply with applicable laws and regulations, including as relates to the products or materials being supplied. Furthermore, Supplier Code of Conduct mandates that Suppliers shall not participate in human trafficking; use any indentured or forced labour, slavery or servitude or purchase materials or services from companies using forced, involuntary or slave labour.

Measuring Effectiveness

We monitor any instances of non-compliance with the provisions in the Supplier Agreements and the Cooper Policies to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. We would tailor appropriate remedial action on a case-by-case basis should there be any instances of non-compliance.

Training and Accountability

Cooper provides compliance training to its employees from time to time and as necessary.

Cooper has adopted and implemented its Ethics and Business Conduct Policy worldwide across all divisions, subsidiaries and affiliated companies and is to be followed by all employees. Employees who commit a material violation of the Ethics and Business Conduct Policy may face disciplinary action, up to and including termination of employment. Materiality of a violation shall be determined on a case-by-case basis by the Governance Committee and shall be based on the Committee's business judgment in its sole discretion. All employees certify on an annual basis that they have received, read, and been trained on the Ethics and Business Conduct Policy.

Cooper continues to assess and evaluate its supply chain's responsible sourcing practices. We strive to enforce best practices in our supply chain and within the entirety of our organization.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2019. It has been approved by the Boards of CooperVision Manufacturing Limited, CooperVision Limited, CooperVision (UK) Holdings Limited, CooperVision Lens Care Limited, Sauflon CL Limited, CooperSurgical Holdings Limited and Research Instruments Limited.



Agostino Ricupati
DIRECTOR

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