Forced Labor in Canadian Supply Chains Report

Argon Medical Devices, Inc.

Requirement (a) – Structure, activities, and supply chains

- Legal Structure: Corporation
- Headquarters: Argon Medical Devices, 7800 Dallas Parkway, Suite 200, Plano, TX 75024
    - Plant Locations; Athens, Texas; Wheeling, Illinois; Henrietta, New York
- Organization Structure:

Argon Medical Devices is a US-based manufacturer specializing in cutting-edge specialty medical devices for interventional radiology, vascular surgery, interventional cardiology, and oncology. Here are some key points about their organization structure:

Global Presence: Argon Medical Devices has over 1,129 employees worldwide. They serve a growing global network of hospitals, clinics, and medical facilities in more than 114 countries.

Product Brands: The company's spirit of innovation is brought to life through various product brands, including Option™ELITE, Cleaner™, BioPince™Ultra, SKATER™, and Scorpion®. These brands offer a range of medical devices for different procedures1.

Customer Base: Argon serves over 5,000 customers directly through its internal sales organization. Additionally, they maintain long-standing relationships with medical device distributors and strategic partners. They also act as the contracted manufacturing partner for other medical device firms.

Core Values: Argon Medical Devices operates based on core values:

Integrity: Doing things the right way and performing as promised.

Respect: Treating others the way they want to be treated.

Responsiveness: Operating with a sense of urgency and accountability.

People: Attracting, developing, and retaining top talent.

Results: Aiming to deliver exceptional outcomes in all they do.

Supply Chains: Argon Medical Devices uses a supply chain made up of 873 Suppliers in ten different categories that supply three production facilities in the United States located in Texas, Illinois, and New York.

Supplier Classification	Number
1 - Prototypes	2
2N - Packaging and Labeling – Nonsterile	64
2S - Packaging and Labeling – Sterile	28
3 - Off The Shelf Item(s)	422
4 - Devices/Instruments or Accessories with no patient contact, coating solution components	93
5 - Devices/Instruments or Accessories with patient contact	188

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6 - Implantable devices or materials or drugs	7
S1 - e.g., Pest Control, laundry, shipping services, housekeeping, phone services, facility landlord (no direct product impact)	22
S2 - Clean Room Certification, Calibration Services, Equipment Repair Services, Manufacturing Processing Services, Printing Services	71
S4 - Sterilization Services and Testing Laboratories	25

Requirement (b) – Policies and due diligence processes

The following statement is a draft of a corporate policy we will be reviewing for implementation in 2024. Currently there is no official policy for forced and child labor prevention.

Corporate Policy: Forced and Child Labor Prevention

Purpose

This policy outlines our commitment to preventing forced and child labor within our global supply chains. We recognize the importance of ethical sourcing and compliance with international labor standards.

Scope

This policy applies to all employees, contractors, suppliers, and partners involved in our supply chain activities.

Policy Statements

1. Prohibition of Forced Labor:
    - We strictly prohibit any form of forced labor, including debt bondage, involuntary servitude, and human trafficking.
    - All workers must be employed voluntarily and without coercion.
2. Prohibition of Child Labor:
    - We do not employ workers below the legal minimum working age in any country.
    - We adhere to the International Labor Organization (ILO) conventions on child labor.
3. Due Diligence and Risk Assessment:
    - We conduct regular risk assessments to identify, and address forced and child labor risks in our supply chains.
    - Suppliers must provide information on their labor practices, including subcontractors.
4. Supplier Compliance:
    - We expect our suppliers to comply with all applicable labor laws and regulations.
    - Suppliers must adopt policies and practices consistent with this policy.
5. Remediation and Corrective Actions:
    - If forced or child labor is identified, we take immediate corrective actions.

    - Remediation efforts include training, monitoring, and collaboration with suppliers.
6. Transparency and Reporting:
    - We maintain transparent communication with stakeholders regarding our efforts to combat forced and child labor.
    - Annual reports will document progress and challenges.

Implementation

- The Chief Compliance Officer is responsible for overseeing the implementation and enforcement of this policy.
- All employees and suppliers are expected to familiarize themselves with this policy and comply with its provisions.

Requirement (c) – Forced labor and child labor risks

Current corporate employment policy in the United States will not allow forced labor or child labor so the risks of this are low for suppliers based in the United States. Argon Medical Devices does have suppliers based in Asia where the risk is higher since we have low oversight of the operations. The Suppliers in South America are from reputable multi-national corporations in the Medical Devices, so the risks are low.

Requirement (d) – Remediation measures

At this point there have been no instances, so remediation measures have not been necessary. If there was an issue corrective actions would be taken.

Requirement (e) – Remediation of loss of income

At this point there have been no instances, so remediation for loss of income to vulnerable families has not been necessary. If necessary, remediation efforts would be explored.

Requirement (f) – Training

The Compliance Department employees (3) have taken classes from Assent University for ESG Concepts and Regulatory Training. The training has not yet been rolled out to other functions due to the program being in its infancy. The training has quizzes built into the program to assess student understanding of the concepts.

Requirement (g) – Assessing effectiveness

At this time no actions have been taken to assess effectiveness in preventing and reducing risks of forced labor and child labor in their activities and supply chains. In the future we will design methods of assessing the effectiveness of the program.

Approval and Attestation:

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Argon Medical Devices, Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

Christopher J Mix

QA Compliance Manager

5/23/2024

I have the authority to bind Argon Medical Devices