

Modern Slavery Statement

Financial Year 2025

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps that BIOTRONIK UK Limited has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Organisation Structure and Supply Chains

BIOTRONIK UK Limited is a member of the BIOTRONIK Group and distributes BIOTRONIK products, including pacemakers, stents, implantable defibrillators, and remote monitoring services, within the United Kingdom and Republic of Ireland.

Our supply chain primarily consists of specialised suppliers of medical technology products, with whom we maintain close partnerships to uphold our company's rigorous ethical and quality standards. We aspire to work only with suppliers who adhere to the same principles of social and ethical responsibility as BIOTRONIK UK.

Policies in Relation to Slavery and Human Trafficking

BIOTRONIK UK Limited applies a zero-tolerance approach to any form of modern slavery. We operate several internal policies to ensure we conduct business in an ethical and transparent manner. Our Code of Conduct defines expected employee and organisational behaviour and commits us to providing a safe work environment as well as following transparent and fair recruitment processes.

This policy incorporates adherence to the ABHI Code of Ethical Business Practice and the MedTech Codes of Ethical Business Practice.

Our Whistleblowing Policy allows all employees to raise concerns regarding the treatment of colleagues or any practices within our business or supply chain, without fear of reprisal.

In addition, BIOTRONIK has adopted a fundamental Human Rights Statement, reaffirming our respect for internationally recognised human rights across all business activities and throughout our supply chains.

Equally, our Supplier Code of Conduct explicitly requires our suppliers to uphold the same high standards regarding the prohibition of modern slavery and human trafficking in their own operations and throughout their respective supply chains. This Supplier Code of Conduct forms an integral component of how we communicate our expectations and requirements concerning human rights, labour standards, and ethical business practices to our suppliers.

Due Diligence Processes

BIOTRONIK UK has established effective systems and controls to safeguard against modern slavery within our business and supply chain. Supplier selection and



evaluation always take into account adherence to our ethical principles and responsible business standards.

Furthermore, the Supplier Code of Conduct is an essential tool for due diligence: All relevant suppliers are required to confirm their compliance with our Supplier Code of Conduct, which includes clear expectations regarding the prevention of modern slavery, respect for human rights, and maintenance of fair labour practices.

Risk Assessment and Management

We conduct our business with integrity and transparency, actively identifying and mitigating potential modern slavery risks in our business and supply chain. Through careful supplier selection, clear contractual expectations via our Supplier Code of Conduct, and internal controls, we consider the risk of modern slavery in our direct supply chain to be low.

Key Performance Indicators to Measure Effectiveness

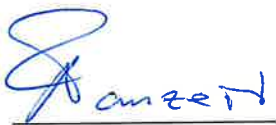
Currently, our approach is qualitatively assessed. We plan to introduce measurable KPIs, such as the number of supplier compliance declarations regarding the Supplier Code of Conduct, supplier audits undertaken, whistleblower reports received, and completion rates of employee and supplier training.

Training on Modern Slavery and Human Trafficking

Our employees receive information on modern slavery risks and the relevant warning signs. We also inform our suppliers about their obligations under our Supplier Code of Conduct. We will reinforce these efforts by offering targeted training to key staff and relevant suppliers.

Declaration

BIOTRONIK UK Limited remains committed to acting ethically and with integrity in all business relationships. Our respect for fundamental human rights and robust Supplier Code of Conduct underpin our efforts to combat modern slavery and human trafficking. We will continue to review and improve our policies, processes, and controls, and transparently report on our progress.



Albert Panzeri

Director