

# Declaration of WITHINGS on the respect of human rights and the fight against modern slavery

Message from Mathieu Letombe, WITHINGS' Chief Executive Officer

*"Since day one, Withings' mission has been to help people take back control of their health and to support healthcare professionals by revolutionizing the patient-practitioner relationship. This mission can only be accomplished with strict respect for human rights regarding our employees, our partners, our service providers and our suppliers.*

*Today, we are proud to see our products and applications integrating naturally into the daily lives of millions of users. Behind these technologies are thousands of people who have worked with us since 2009, with confidence, in order to give our users the power to know themselves better through health data.*

*With WITHINGS' declaration on respect for human rights and the fight against modern slavery, we wish to remind everyone, including ourselves, that these notions are not up for debate. It is our fundamental responsibility to respect, anticipate, raise awareness about and implement any action regarding the fight against modern slavery, whatever form it takes."*

## I. Introduction

This statement is issued in response to the Commonwealth Modern Slavery Act (Australia, 2018) and the United Kingdom Modern Slavery Act (2015). The laws requires major organizations doing business in Australia and in the United Kingdom to disclose, in an annual statement, the steps they have taken to prevent modern slavery from occurring in their own operations and in their supply chains. This declaration is made on behalf of the company WITHINGS for the financial year that ended December 31, 2021. Each of the subsidiaries of WITHINGS directly subject to the Law may rely on this declaration for its own declaration.

### A. The company

For more than 10 years, WITHINGS has been creating objects at the cutting edge of both medical technology and premium design. We are guided by our promise to revolutionize health. By providing new measurement tools that collect and

monitor vital data remotely, we are making a lasting impact on the relationships individuals have with their health, all over the world. With its 5 offices located on 3 continents, and 388 employees, WITHINGS supports more than one million customers each year.

## **B. Our supply chain**

WITHINGS works with large companies and SMEs all over the world for its supply. Our main purchasing categories are materials and labor for the manufacture of our products, transport, marketing, consulting and IT.

## **II. Commitments and policies**

### **A. Regulation and international standards**

Our mission is based on trust, collaboration, continuous improvement and user empowerment. These values are shared by all employees and they contribute to making WITHINGS an ethical company committed to health innovation.

Concerned about improving the health of its customers, WITHINGS is naturally concerned about the well-being of all the people within its ecosystem. It is important to us that all those involved in the marketing of our products and services find security and fulfillment in their work.

We do not tolerate any form of modern slavery or any other form of forced labor, human trafficking or child labor.

We expect our employees and casual workers, as well as the employees and temporary workers of our suppliers, to scrupulously respect the Universal Declaration of Human Rights, and the labor standards defined and enacted by the International Labor Organization (ILO), as well as national legislation, so that all employees of WITHINGS and its partners have access to dignified working conditions that respect human rights. WITHINGS' commitments to human rights are also guided by each of the following standards and initiatives:

- The International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- The UN Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The United Nations Global Compact;
- The Ethical Trading Initiative

## **B. Our policies**

WITHINGS acts in compliance with the legal and regulatory framework of each of the countries in which it operates. In certain jurisdictions where the legal and regulatory framework does not provide sufficient security, WITHINGS uses as a reference the international standards and initiatives regarding the respect and protection of human rights which are listed above. WITHINGS is not subject to the Duty of Vigilance law in France, but has developed policies and commitments that aim to reduce the risk of human rights violations. They include, but are not limited to, the following:

- Its human rights and anti-slavery policy, with which WITHINGS undertakes to respect human rights (including those relating to modern slavery and human trafficking) and to comply with the rules established by the fundamental conventions of the ILO. This policy applies to all company employees.
- Its anti-corruption policy
- Internal policies, formal processes and agreements relating to human resources

## **III. Identification of risks of modern slavery practices in operations and supply chains**

The 5 Withings offices are located on 3 different continents, and we work with subcontractors located mainly in Asia. With regard to our employees and our suppliers, there are risks of infringement of human rights, fundamental freedoms, and health, as well as risks inherent in the different sectors of activity of our suppliers and subcontractors, in particular industrial ones. Regarding the use of our products and services, there are risks related to the health and safety of users, as well as risks related to the protection of health data.

## **IV. Steps taken to assess and address those risks, including due diligence and remediation processes, and assess the effectiveness of those actions**

- At supplier level

We are working to assess and prevent the risks that may arise from our supply chains by joining the efforts of our Corporate Social Responsibility (CSR) department and our procurement department to ensure that our suppliers respect human rights.

- Our engineers and our supply department regularly visit our suppliers and our partner assembly plants,
  - In addition to these visits and since 2021, our partner assembly plants have been subject to independent regular SEDEX-type ethical audits to verify compliance with human rights and working conditions such as those defined in the Ethical Trading Initiative. These audits verify in particular the absence of common signs of forced labor as those listed by The International Labor Organization (ILO), such as excessive overtime, restriction of movement or isolation.
  - In WITHINGS identify or suspect cases of modern slavery in its supply chain, we will tailor our response according to the local circumstances, by engaging with local NGOs and industry bodies, and if needed, by contacting local government and law enforcement bodies.
  - Key performance indicators for monitoring the effectiveness of these actions: number of non-compliances, rate of resolution of these non-compliances.
- At employee level

We have implemented HR governance, structured around:

- The human resources department working on employment conditions and occupational health and safety.
- An annual update of the Single Occupational Risk Assessment Document in terms of health and safety with the establishment of an action plan.
- Key performance indicators for monitoring the effectiveness of these actions: number of workplace accidents, number of absences related to occupational illnesses.

## **V. Next steps**

- At supplier level
- As of January 1, 2022, our partner assembly plants will have to sign an ethics clause in their contracts and confirm that they have read our policies on respect for human rights and the fight against corruption.
- We are going to deploy a CSR questionnaire to our main suppliers. We plan to increase the number of suppliers assessed by this questionnaire each year.
- We plan to release a Supplier Code of Conduct, which outlines the company's expectations on their suppliers' practices on the following topics: responsible environmental management, implementation of safe working conditions, treatment of their employees with respect and dignity, and ethical business practices. WITHINGS will expect its suppliers and

those with whom it maintains business relationships to implement practices that are, or aim to be, consistent with this Code.

- At employee level
  - From April 2022, direct consultations with employees on general employee satisfaction and working conditions will be implemented through a monthly satisfaction survey.
  - A whistleblower channel will be available for anyone wishing to raise an alert regarding human rights or corruption risks.
  - We plan to develop training for managers in diversity and inclusion issues.
  - We will send the ethical policies during the onboarding process of all employees.
  - We will study the opportunity of the training of the purchasing department in the issues of respect for human rights.

Overall, we plan to make our ethics policies public and update them regularly for continuous improvement.

This statement was issued in response to the Commonwealth Modern Slavery Act (Australia, 2018) and the Modern Slavery Act (United-Kingdom, 2015). It constitutes the WITHINGS statement on modern slavery and human trafficking for the year ended December 31, 2021.

This statement was approved by the board of WITHINGS in their capacity as principal governing body of WITHINGS, on 6 October 2022.

This statement was signed by Mathieu Letombe in his role as the Chief Executive Officer of WITHINGS, on 6 October 2022.

Mathieu Letombe, WITHINGS' Chief Executive Officer, 6 October 2022

