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A Siemens Healthineers Company

MARCH 2026

MODERN SLAVERY STATEMENT



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This Modern Slavery Statement ('Statement') is made pursuant to section 13 of the *Modern Slavery Act 2018 (Cth)* ('Act') on behalf of Varian Medical Systems Australasia Pty Ltd ABN 53 086 249 630 ('Varian Australasia'). It covers activities during the reporting period 1 October 2024 to 30 September 2025. The purpose of this Statement is to outline our approach to ensure that Varian Australasia has a robust framework and processes in place to recognise and implement actions to minimise the risk of modern slavery and human trafficking in our business operations and supply chain.

Company identity and consultations

Varian Australasia is a subsidiary of Varian Medical Systems, Inc. ('Varian'), a global leader in developing and delivering cancer care solutions focused on creating a world without fear of cancer. Varian designs and manufactures medical devices and software used to treat cancer and other medical conditions, including linear accelerators, afterloaders and a range of accessories and interconnected software tools used to plan, verify and deliver advanced cancer treatments.

Varian Australasia distributes and supports these technologies across the Australasian region. Headquartered in Sydney, Australia, the organisation employs over 100 professionals across Australia and New Zealand, most of whom work remotely. Its activities include the sales, installation and servicing of radiation treatment delivery, simulation, planning and data management systems used in advanced cancer treatment.

Varian Australasia does not own or control any entities. Accordingly, consultation with other reporting entities was not required for this Statement.

On 15 April 2021, Varian was acquired by Siemens Healthineers AG ('Siemens Healthineers'). As a united organisation, the group now offers a comprehensive portfolio spanning in-vitro diagnostics, best-in-class imaging, therapy and follow-up care addressing the full cancer care continuum. Varian Australasia supports this integrated approach across the region while maintaining a strong focus on patient care and service delivery.

Varian Australasia is committed to operating responsibly and upholding high ethical standards. The organisation does not tolerate any form of slavery or human trafficking in its operations or supply chains, and works with suppliers that are expected to align with its values and ethical expectations.

Company structure, operations, and supply chain

Varian Australasia has a simple supply chain that involves purchasing products and services required for the scope of our work. Our business partners include suppliers from the following sectors: manufacturing, logistics, marketing, calibration services, construction services, staff training, and communication and IT equipment.

Varian’s direct suppliers are established in the following locations:

ITEM	COUNTRY OF ORIGIN
Product and Parts	Legal Manufacturer - Varian Medical Systems, Inc. Palo Alto, USA Manufacturing Sites: Canada (Winnipeg); China (Beijing, Hangzhou); Finland (Helsinki); Germany (Haan, Kemnath, Munich, Troisdorf); Hungary (Budapest); India (Pune); Mexico (Baja); Switzerland (Baden/Daettwil, Steinhausen); United States of America (Atlanta, Austin, Palo Alto).
Calibration Tools	Australia, USA
IT Equipment	Australia, USA
Construction Services	Australia
Ad Hoc Services (i.e. marketing, training) and office supplies	Various locations in Australia/New Zealand

TABLE 1

Varian Australasia understands that the environmental, social and governance (ESG) risks relating to suppliers will vary depending on their industry, geographic location and company size. Supplier onboarding, qualification, monitoring and development are supported through structured global procurement and supplier quality management systems, including the Supplier Lifecycle Management (SLiM) platform, risk-based supplier categorisation and ongoing supplier evaluation processes. Varian’s procurement function is managed globally by our head company Siemens Healthineers.

Our procurement team have robust processes in place to mitigate the risk of modern slavery in our supply chain including written policies and procedures as well as onboarding requirements that apply to suppliers. Our suppliers are categorised, evaluated, approved and monitored dependent on their identified risk. Varian considers legal compliance and sustainability to be a primary duty and therefore also expect this from our suppliers. All suppliers are expected to demonstrate their commitment to the standards and principles set out in the Code of Conduct for Suppliers and Third Party Intermediaries (‘CoC’), which forms part of the supplier onboarding process.

Risk of modern slavery practices in the operations and supply chains

At Varian, we recognise that slavery and human trafficking can occur in many forms. These may include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. Such practices can occur across a wide range of industries and geographies and may be present at different points within complex supply chains, particularly where vulnerable workers are exposed to power imbalances, limited oversight or informal labour arrangements.

In Australia, forced labour exploitation is most commonly reported in industries considered higher risk including agriculture, construction, domestic work, meat processing, cleaning, hospitality and food services. These sectors often rely on migrant or temporary workers, and evidence indicates that risks may arise where workers face language barriers, limited understanding of workplace rights, dependency on employers for visa sponsorship or fear of reporting exploitation [1].

Within Asia and the Pacific, Australia is ranked 26 out of 27 countries in terms of the prevalence of modern slavery, and 149 out of 160 countries globally on the Global Slavery Index (GSI) [1]. The Global Slavery Index estimates that approximately 41,000 people were living in modern slavery in Australia in 2021 despite Australia having one of the strongest government responses to modern slavery globally.

As a professional services organisation, Varian Australasia has a relatively low risk of directly importing products associated with modern slavery as it has limited exposure to industries where such risks are most prevalent. However, participation in global trade means that Varian Australasia may still be exposed to modern slavery risks through the products it imports, particularly where manufacturing and upstream supply chain activities occur in higher-risk regions.

The Global Slavery Index identifies that a significant proportion of forced labour globally occurs in the extraction of raw materials and early stages of production. Table 2 outlines the key product categories imported into Australia that are recognised as being at higher risk of modern slavery due to their source countries [1].

In this context, Varian recognises that certain products may present modern slavery risks within the manufacturing supply chain. These risks are addressed through Varian's Actions to Assess and Address Risks.

PRODUCT AT RISK OF MODERN SLAVERY	SOURCE COUNTRY
Electronics	China, Malaysia
Garments	Argentina, Bangladesh, Brazil, China, India, Malaysia
Solar Panels	China
Textiles	China
Fish	China, Ghana, Indonesia, Taiwan, Thailand

TABLE 2

1. <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

Actions to assess and address risks

Varian Australasia seeks to do business with suppliers that have similar values, ethics and sustainable business practices including those related to human rights. We expect our suppliers to operate in accordance with all applicable modern slavery laws.

Varian has various policies in place to ensure all staff and suppliers meet our core values. Our formal policies are intended to promote ethical and legally compliant business conduct and include the following:

Business Conduct Guidelines ('BCG'). The BCG provides an ethical framework that guides how we interact with each other, our customers, the patients who use our products, the business community and governments worldwide.

Supplier Code of Conduct ('CoC'). The CoC establishes Varian's expectations for supplier conduct. This includes provisions relating to ethical and lawful business practices, as well as the prevention of child labour, slavery and human trafficking.

In addition to these commitments, supplier risks are managed through risk-based supplier quality audits, corrective and preventive action (CAPA) processes, and supplier development plans. These mechanisms support early identification of issues, structured remediation, and continuous improvement prior to escalation or supplier phase-out.

The CoC is aligned with the UN Global Compact and the UN Guiding Principles on Business and Human Rights. Through the CoC, Varian's suppliers commit to minimum standards for the following:

- Legal compliance
- Prohibition of corruption and bribery
- Fair competition, anti-trust laws and intellectual property rights
- Conflicts of interest
- Prohibition of child labour
- Conflict minerals
- Health and safety of employees
- Environmental protection
- Supply chain (2nd tier suppliers)
- Respect for basic human rights of employees

The Siemens Healthineers group of companies is also actively working to ensure full compliance with all obligations set forth by the German Supply Chain Due Diligence Act (SCDDA) which came into effect on 1 January 2023. We are taking the necessary steps to integrate its requirements into our operations and supply chain practices, reinforcing our commitment to responsible business conduct.

Our global organisation is required to submit an annual report to Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA) on how we comply with the SCDDA requirements and the due diligence obligations. In addition to submitting the report to BAFA, the report is also published on the global Siemens Healthineers website.

Sustainability report

It is crucial to recognise that sustainability plays an important role in addressing modern slavery by helping to reduce the conditions that can increase vulnerability to exploitation among workers and communities. Environmental degradation, economic instability and social marginalisation can contribute to poverty, limit access to secure livelihoods, and increase reliance on informal or high-risk work arrangements, which may heighten the risk of labour exploitation.

By promoting responsible environmental management, fair economic practices, and respect for communities, sustainability initiatives can help address some of the structural drivers that contribute to vulnerability. For example, protecting natural resources, supporting stable local economies and encouraging responsible business practices can reduce the likelihood that communities become marginalised or economically dependent on exploitative labour markets. While sustainability initiatives do not prevent modern slavery on their own, they can help reduce risk and improve visibility within supply chains.

In the context of this Modern Slavery Statement, it is also important to recognise that healthcare is a fundamental human right and a cornerstone of a healthy and sustainable society. As a medical technology company, Varian seeks to support sustainability in healthcare by working with customers, partners and employees toward a resilient and sustainable future. Our sustainability priorities focus on improving access to healthcare, preserving the planet's resources and supporting an engaged workforce, recognising that strong governance and responsible business practices contribute to long-term social and economic stability.

Through engagement with key stakeholders, including customers and investors, Varian aims to integrate environmental, social and governance considerations into its business practices in a way that supports ethical conduct and responsible supply chain management. This integrated approach helps ensure that sustainability initiatives are implemented with due consideration of their potential social impacts including risks related to modern slavery.

Actions

During the reporting period, Varian Australasia has continued to improve upon our supplier quality management processes. Varian Australasia completed the following activities during FY25 to meet requirements of the Act:

- Continued application of supplier quality audits, CAPA processes and supplier performance monitoring to address operational and supplier risks.
- Progressed sustainability commitments, including decarbonisation activities within our own operations as part of broader efforts to preserve resources, support healthcare access, and contribute to a resilient and sustainable healthcare system.
- Continued to apply the BCG and CoC, including strengthened expectations relating to ethical business conduct, freedom of association for workers and protection for whistleblowers.
- Continued to support modern slavery awareness through participation in externally led webinars and information-sharing activities.

Actions cont.

Varian Australasia plans to undertake the following additional and ongoing activities to meet requirements of the Act.

- Explore and implement opportunities to refurbish, reuse and upgrade medical devices where safe and appropriate. By extending the life of equipment and reducing the need for newly extracted raw materials, the organisation aims to reduce potential exposure to labour exploitation risks that can occur in upstream raw material extraction and early-stage processing.
- Implement sustainability and decarbonisation initiatives in ways that consider potential impacts on workers and communities within the supply chain. Environmental initiatives will be reviewed to ensure that cost or efficiency pressures are not transferred to vulnerable workers. Sustainability governance processes will be used to balance environmental progress with the protection of human rights.
- Draw on our ISO 13485-certified quality management systems as an operational strength to support responsible demand planning, coordinated procurement and strong quality oversight across its supply chains. Through established supplier evaluation, quality audits and CAPA processes, the organisation aims to reduce last-minute sourcing and emergency production pressures that may increase labour exploitation risks. Where operational, cost, sustainability or innovation objectives may create potential human rights risks, these trade-offs will be identified and escalated through appropriate governance processes for review.
- Consider labour visibility when digitalising services or outsourcing activities. Where work becomes less physically visible, the organisation will maintain transparency through supplier engagement, reporting channels and escalation pathways to help identify potential labour risks.
- Promote accessible reporting channels and raise awareness of modern slavery indicators among employees and relevant stakeholders. The organisation recognises that increased awareness may lead to increased reporting and treats reporting mechanisms as tools for identifying risks and strengthening organisational learning.



Assessing the effectiveness of our actions

Varian Australasia assesses the effectiveness of its actions to prevent and address modern slavery by reviewing both outcomes and the effectiveness of supporting processes. Several existing processes, including grievance and reporting mechanisms, support visibility of potential risks and provide an important means of identifying concerns within our operations and supply chain. These mechanisms are designed to enable employees and other stakeholders to raise issues confidentially and without fear of retaliation, consistent with the principles set out in the BCG and CoC.

To date, no modern slavery incidents have been identified within Varian Australasia's operations or supply chain during the reporting period. However, the organisation acknowledges that the absence of reported incidents does not indicate the absence of risk. Modern slavery risks are often hidden and under-reported, particularly within complex and globalised supply chains, and may not be immediately visible through incident-based reporting alone. Accordingly, Varian Australasia uses a range of process-based and qualitative measures, rather than relying on incident reporting alone.

These measures include the ongoing application of ethical governance frameworks, including the BCG and CoC, as an important measure of effectiveness. These frameworks establish clear expectations regarding ethical business conduct, human rights and labour practices, and are communicated to employees and suppliers to support awareness and consistent application. The continued application of these frameworks supports a culture of integrity and reinforces expectations across business activities.

Varian Australasia also recognises the role of sustainability governance and broader ESG oversight in supporting the assessment of modern slavery risks. Sustainability reporting provides transparency regarding environmental, social, and governance priorities and progress including workforce engagement and responsible business conduct. While sustainability outcomes are not a direct proxy for modern slavery risk, sustainability and modern slavery are connected through shared drivers that shape vulnerability and risk within supply chains.

Looking forward, Varian Australasia will continue to explore appropriate ways to strengthen its assessment of effectiveness, including consideration of process-based indicators and qualitative measures that support early identification of risk. This may include reviewing how existing processes, such as training, awareness activities and reporting mechanisms, contribute to risk visibility and organisational learning. Effectiveness will therefore continue to be assessed as part of an ongoing, risk-based approach rather than as a one-off or purely quantitative exercise.

Reporting and feedback mechanisms

Varian encourages all employees and business partners to promptly raise questions or concerns about potential breaches of law, the BCG, CoC, ethical business standards, accounting and auditing requirements and/or Varian policies.

Varian maintains a whistleblower policy that enables employees and other stakeholders to raise concerns in a safe and confidential manner without fear of retaliation. Reports can be made through the Let Us Know reporting hotline which is operated by an independent third party and provides a secure channel to protect the confidentiality of reporters. The hotline is accessible 24-hours a day, seven days a week, in multiple languages, via telephone or online. Employees are also encouraged to seek guidance whenever they are uncertain about their responsibilities under the BCG, CoC, company policies, or applicable laws and regulations.

To support compliance with the CoC Varian maintains a compliance program that investigates potential violations and takes appropriate action where required. Investigations are conducted in consultation with relevant stakeholders, and outcomes may include corrective action, referral to appropriate authorities, or disciplinary measures, which may extend to termination of employment or contract where warranted.

Training and awareness

Promoting awareness of modern slavery risks among employees through engagement and training supports the identification of potential modern slavery and human trafficking issues within Varian Australasia's operations and supply chain. Varian Australasia employees complete a range of ethics-related training, including annual training on the BCG, and are expected to comply with its requirements.

Suppliers are required to comply with the requirements of the CoC and to ensure processes are in place to enable the reporting of concerns or potential violations of ethics, policy or law without fear of retaliation.

This Modern Slavery Statement is communicated to all Varian Australasian employees and is reviewed annually by the business to ensure its ongoing appropriateness and suitability.

This Statement was approved by the Board of Varian Medical Systems Australasia Pty Ltd on 12 March 2026.



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