



Cochlear Limited

Modern Slavery Statement 2023



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About this Statement

This joint modern slavery statement has been prepared by Cochlear Limited (ACN 002 618 073) on behalf of itself and Cochlear German Holdings Pty Limited (ACN 134 635 251) (**CGHPL**) as reporting entities under the Modern Slavery Act 2018 (Cth) and on behalf of Cochlear Europe Limited (**CEL**) as a 'commercial organisation' under the United Kingdom's Modern Slavery Act 2015. It describes the approach and actions taken by Cochlear Limited, CGHPL, and their controlled entities including CEL (**Cochlear**) to assess and address modern slavery risks in their operations and supply chains during the financial year ended 30 June 2023 (**FY23**).



Our Story

Graeme Clark, an Australian ear surgeon, saw first-hand the isolation and frustration that comes from living in a world of silence as his father struggled with hearing difficulties. On holiday in 1977, fiddling with a shell and a blade of grass, Graeme realised there was a safe way to insert electrodes into the inner ear. It was Graeme's determination to help others that realised our first implantable solution, reconnecting Rod Saunders to hearing and bringing music into his life.

Professor Clark partnered with Australian entrepreneur Paul Trainor – and his Nucleus Group – and the University of Melbourne to commercialise the cochlear implant. With funding from the Australian government, they developed the Cochlear™ Nucleus® 22 Implant, the first multi-channel cochlear implant, and Cochlear, the company was formed.

Today, Cochlear is the leader in implantable hearing solutions, connecting hundreds of thousands of people globally to a life full of hearing. The pioneering spirit that started Cochlear all those years ago continues to drive us forward and our commitment is stronger than ever. We're transforming the way people understand and treat hearing loss, and we're committed to reaching more people to provide support for a lifetime of hearing.





Cochlear's structure and operations

Cochlear Limited is the parent company of the Cochlear group and commenced operations in 1981 as part of the Nucleus group. In 1995, Cochlear Limited listed on the Australian Securities Exchange, and is a top 30 listed Australian company with a market capitalisation of over \$15 billion. CGHPL is a wholly-owned Australian subsidiary within the Cochlear group and is a parent company for a number of Cochlear subsidiaries incorporated in Europe.

Our goal is to deliver value by helping more people to hear, which contributes to building a healthier and more productive society. Our strategy is focused on improving awareness of and access to implantable hearing solutions for people indicated for our products.

We are pioneers and global leaders in the development, manufacture and commercialisation of implantable hearing solutions, collaborating in over 100 research programs worldwide to further research into hearing loss.

Cochlear's global headquarters are on the campus of Macquarie University in Sydney, with regional offices in Asia Pacific, Europe, Middle East and the Americas. Cochlear has a deep geographical reach, selling in over 180 countries, with a direct presence in more than 30 countries and a global workforce of close to 5,000 employees. Cochlear operates manufacturing facilities and/or research & development (R&D) centres in Australia, Belgium, China, Malaysia and Sweden.

We invest around 12% of sales revenue each year in R&D, with over \$2.7 billion invested since listing, and we have a portfolio of more than 1,700 patent and patent applications worldwide.

Over the past 40 years we have provided more than 750,000 implant devices to people who benefit from one – or two – of our implantable solutions. And we deliver a lifetime of hearing solutions for recipients, with sound processor upgrades and services to support prior generation products.

Cochlear's global headquarters in Sydney is primarily responsible for global supply chain management and for implementing key procurement policies and procedures for our major manufacturing and R&D operations.

Entities responsible for Cochlear's manufacturing and/or R&D operations	Manufacturing / R&D	Location
Cochlear Limited	Manufacturing and R&D	Sydney, Australia Brisbane, Australia
Cochlear Technology Centre Belgium, a branch of Cochlear Research and Development Limited	R&D	Mechelen, Belgium
Cochlear Bone Anchored Solutions AB	Manufacturing and R&D	Gothenburg, Sweden
Cochlear Malaysia Sdn Bhd	Manufacturing	Kuala Lumpur, Malaysia
Cochlear Medical Device (Chengdu) Co Ltd	Manufacturing	Chengdu, China

Management of modern slavery risks including the design and implementation of relevant policies, procedures as well as screening and risk-based assessment of modern slavery risks for the Cochlear group are coordinated and largely undertaken by Cochlear's global headquarters in Sydney. Activities relating to the marketing, distribution and sales of Cochlear's products and services are managed and executed by Cochlear's regional subsidiaries that are entities controlled by Cochlear Limited.



Our sustainability approach

Cochlear's sustainability approach is integrated with business strategy. It reinforces our focus on creating positive social impact at individual and societal levels, while minimising our environmental impact. It helps guide our strategic priorities, manage risk and improve performance.

Our approach is informed by our materiality assessment and business priorities as well as the Global Reporting Initiative (GRI) framework, the United Nations Sustainable Development Goals (SDGs) and the United Nations Global Compact (UNGC) Principles. Cochlear has been signatory of the UNGC since 2022 and support the Ten Principles in the areas of human rights, labour, environment and anti-corruption.





Cochlear's supply chains

Cochlear relies on its global network of suppliers to support its manufacturing, R&D, and business operations. During FY23, Cochlear worked with over 750 external suppliers which provided a diverse range of products and services such as electronic components, batteries, precious metals, metal injection moulded parts, and contract manufacturing to support our manufacturing and R&D activities (**Production-related Suppliers**). In the same period, Cochlear also engaged approximately 2,900 external suppliers to enable and support Cochlear's business activities and corporate functions (**Non-production-related Suppliers**). The framework for due diligence and assessing modern slavery risks of suppliers which are new to Cochlear is described under the 'Actions taken to assess and address modern slavery risks' section.

Cochlear maintains a significant degree of oversight with respect to our Production-related Suppliers and applies centralised management of procurement processes for our manufacturing and R&D operations given our need to carefully select, evaluate, monitor and tightly control the inputs used in manufacturing, packaging and transporting our products.





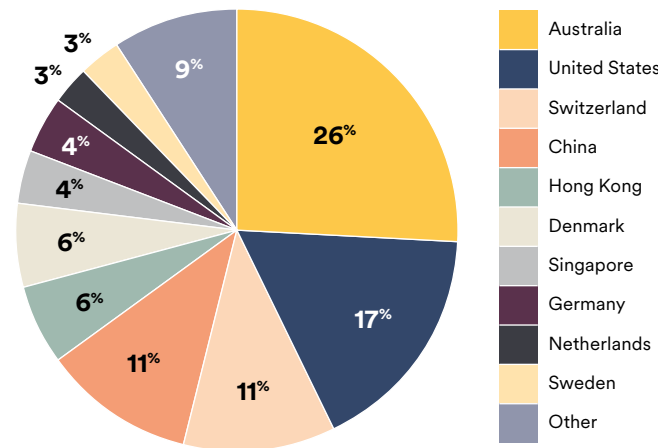
Set out below is a table outlining our top 10 sourcing locations by spend during FY23 with our Production-related Suppliers, and an overview of the top 3 categories of products or services procured from each location.

Location	Top 3 categories of products or services externally procured by spend from each location
1 Australia	Electronics, Acoustic Components, Precious Metals
2 United States	Batteries, Electronic Assemblies, Precious Metals
3 Switzerland	Batteries, Printed Circuit Boards, Integrated Circuits
4 China	Plastic Moulded Parts, Contracting Manufacturing, Integrated Circuits
5 Hong Kong	Contract Manufacturing, Plastic Moulded Parts, Metal Injection Moulded Components
6 Denmark	Accessories, Electronic Assemblies, Sterile Components
7 Singapore	Integrated Circuits, Electronics
8 Germany	Electronic Assemblies, Metal Stamped Components
9 Netherlands	Electronics, Integrated Circuits, Ceramics
10 Sweden	Sterile Components, Plastic Moulded Parts

Top 5 sourcing categories of goods or services purchased from Production-related Suppliers by spend

Sourcing category	% of total spend with Production-related Suppliers
1 Batteries	11%
2 Contract Manufacturing	9%
3 Electronic Assemblies	7%
4 Plastic Moulded Parts	7%
5 Electronics	7%

Percentage of Cochlear's spend by locations of Production-related Suppliers



Cochlear's headquarters in Sydney also provide centralised oversight and management for the procurement of goods and services from Non-production-related Suppliers. However, a significant portion of the purchasing from Non-production-related Suppliers is undertaken by the teams and departments in various regions and functions in a more decentralised manner, owing to the breadth of our business and the number of locations in which Cochlear's marketing, distribution and sales functions operate. Set out below is a table outlining our analysis on top 10 sourcing locations by spend during FY23 with our Non-production-related Suppliers, and an overview of key categories of products or services procured from each location.

Location	Top 3 categories of products or services supplied by spend
1 Australia	Corporate Services, IT, Facilities
2 United States	Corporate Services, Facilities, Transport & Freight
3 Malaysia	Corporate Services, Facilities, IT
4 Belgium	Corporate Services, Consulting, Facilities
5 United Kingdom	Corporate Services, Facilities, IT
6 Sweden	Corporate Services, Consulting, Facilities
7 China	Corporate Services, Consulting, Facilities
8 Germany	Corporate Services, Legal, Facilities
9 Switzerland	Consulting, IT, Conference
10 Singapore	Corporate Services, Consulting



Modern slavery risks in Cochlear's operations and supply chains

Cochlear takes a risk-based approach to identifying and addressing the extent to which it may contribute to, cause or be linked to modern slavery risks in its operations and supply chain.

The United Nations (UN) Guiding Principles on Business and Human Rights characterizes modern slavery in three ways: causing modern slavery or impacting human rights through their operational activities, contributing to modern slavery or human rights impacts through their operational activities or being linked to modern slavery or human rights. Drawing upon the United Nations Guiding Principles on Business and Human Rights, the potential modern slavery risks within Cochlear's operations and supply chain may be summarised as follows:

Summary of potential modern slavery risks within our operations and supply chain

Cochlear's Operations		Cochlear's External Supply Chain	
Engagement of consultants and contractors through third parties	Cochlear could potentially be <i>directly linked</i> to modern slavery, as hiring practices of third parties through which Cochlear's engages consultants and contractors, particularly in higher risk locations, may not be fully visible to Cochlear	Purchase of products, and services from Cochlear's external suppliers	Cochlear could potentially be directly linked to modern slavery when we purchase products and services from higher risk industries or sectors (such as precious metals, electronics and cleaning) and/or from suppliers in higher risk locations Cochlear could potentially be directly linked to modern slavery when we purchase products and services from suppliers that source their raw materials, components and services from higher risk industries or sectors and/or from higher risk locations

Risks of modern slavery in our operations

Cochlear Limited exercises management control and oversight over all of our manufacturing and R&D operations, and has in place group-wide policies, a risk management system, and compliance controls whether these relate to our manufacturing and R&D operations or otherwise.

Verifications of working rights are conducted for employees across all locations in which we operate as part of our standard recruitment process. In addition, Cochlear's employee onboarding process at our manufacturing operations in Malaysia and China for workers foreign to those countries involve an additional check undertaken by an external provider to verify the candidates' identities and working rights.

The majority of our workers are employed directly by Cochlear– this lowers the risk of modern slavery within our operations.

In FY24, Cochlear intends to further embed our commitment to fair and ethical recruitment by reviewing and updating our standard third-party recruitment agency engagement terms to strengthen supplier obligations in relation to modern slavery.



Country	% of total Cochlear workforce
Australia	42%
USA	15%
Malaysia	8%
China	7%
Sweden	5%
Other	23%

Worker Type	% of total Cochlear workforce
Permanent	86.6%
Fixed term	2.3%
Casuals/hourly	0.7%
Consultants	10.0%
Contractors	0.5%

Please refer to Cochlear Limited's 2023 Annual Report to read more about our workforce and its composition.

Risks of modern slavery in our supply chain

We use internationally recognised tools and resources such as the [Global Slavery Index](#) to establish a risk assessment framework for identifying suppliers with a high modern slavery risk exposure.

Cochlear respects human rights and aims to conduct our business in alignment with the rights and principles in the United Nations Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

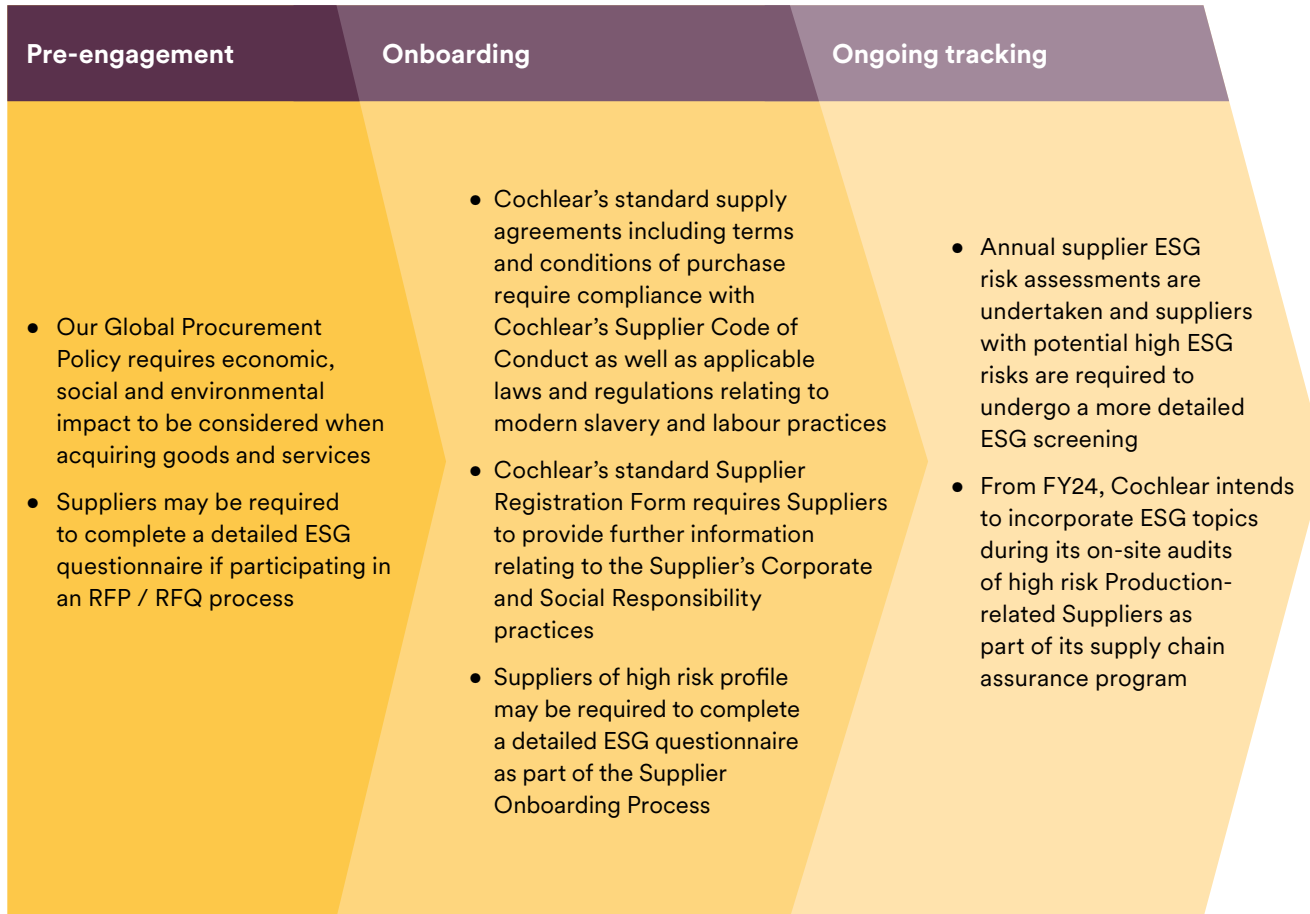
In reference to these tools and resources as well as internally established guidelines, Cochlear assesses supplier risk having regard to a number of criteria that take into account our spend with the supplier, geographic, sector/industry and product/ services risks. In FY23, we have undertaken a risk assessment of existing suppliers with whom our annual spend is greater than AUD\$50,000 and have identified potential risk exposures as set out in the table below:

Type	Criteria	Examples of potential risk exposures identified
Social risks based on sourcing country's record on human rights & labour rights	Operates in average or above average modern slavery risk location based on the Global Slavery Index.	A number of suppliers based in countries in the Asia Pacific region were identified as potentially at risk
Sector risks based on sourcing categories	Operates in high modern slavery risk industries / sectors as determined in reference to publicly available resources including those from the Department of Home Affairs, UK Home Office and KPMG Modern Slavery Guide	A number of suppliers providing goods or services in high-risk sourcing categories such as electronic components, precious metals, contract manufacturers and facility services were identified as potentially high risk



Actions taken to assess and address modern slavery risks

Cochlear's Supply Chain ESG Risk Management Framework



Due diligence

Within our own operations, Cochlear sets the 'tone at the top' by continually reinforcing a culture of acting lawfully, ethically and responsibly. Our Global Code of Conduct (**Code**) which is an essential part of our commitment to conducting business legally, ethically and responsibly, sets out the required conduct of all Cochlear Representatives in a way that is consistent with being a good global corporate citizen. The Code, which is endorsed and supported by the Board and senior management, affirms Cochlear's commitment to ensuring there are no modern slavery practices in its operations and supply chains and encourages all Cochlear Representatives to reach out and ask questions if they identify any incidents of suspected human rights issues, including modern slavery. During FY23, Cochlear conducted mandatory comprehensive training on its Global Code of Conduct, including on modern slavery risks, for all new staff including for Cochlear's regional subsidiaries.

Cochlear continues to work with its suppliers to enhance their compliance with Cochlear's expectations and standards set out in the Supplier Code of Conduct in relation to human rights and labour practices, safety and wellbeing, environmental sustainability and ethical trading. The Supplier Code of Conduct, which is given effect through our supplier onboarding process and legal agreements with suppliers, also requires suppliers to undertake appropriate measures to ensure that their own suppliers, partners and distributors comply with the standards set out in the Supplier Code of Conduct.



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In FY23, Cochlear has undertaken a comprehensive review of our Global Code of Conduct and Supplier Code of Conduct which resulted in material updates to various content topics including modern slavery and human rights. Cochlear Limited's Audit & Risk Committee as well the Board reviewed and approved the updated Global Code of Conduct and Supplier Code of Conduct, which were published in July 2023. The updated Global Code of Conduct and Supplier Code of Conduct renews Cochlear's commitment to ensuring there are no modern slavery practices in our operations and supply chains.

Cochlear's standard supply agreements require our suppliers to comply with all relevant legislation, including those relating to modern slavery and labour practices, and to carry out their own measures to ensure that their employees, affiliates, agents or subcontractors comply with our Supplier Code of Conduct.

Cochlear has a suite of policies and procedures that support its efforts to screen, assess and manage the risks of modern slavery risks in its supply chain. New suppliers that provide products or services that are critical to our manufacturing and R&D activities are screened for major governance, human rights and environmental risks. As part of this screening process, any supplier deemed to carry a high governance, human rights and environmental risk based on internally established standards and thresholds are required to undergo a more detailed ESG risk assessment.

Our policy framework at-a-glance

Policy	Type	Purpose
Global Procurement Policy	Business-wide policies and procedures	Cochlear's Global Procurement Policy requires all Cochlear employees to take into account environmental and social issues when procuring goods and services.
Whistleblower Protection Policy	Business-wide policies and procedures	Cochlear's Whistleblower Protection Policy aims to promote a culture of acting lawfully, ethically and responsibly by enabling Eligible Protected Persons to confidentially report suspected or actual misconduct in relation to Cochlear, without fear or reprisal, victimisation or disadvantage.
Global Code of Conduct	Operational policies and procedures	Cochlear's Global Code of Conduct outlines expectations of Cochlear Representatives in the way in which they must conduct business lawfully, ethically and responsibly.
Supplier Code of Conduct	Supply chain policies and procedures	Cochlear's Supplier Code of Conduct outlines Cochlear's expectations on our suppliers regarding standards of behaviour in relation to human rights and labour practices, safety and wellbeing, environmental sustainability and ethical trading.
Supplier ESG Risk Assessment Procedure	Risk management policies and procedures	Cochlear's Supplier ESG Risk Assessment Procedure defines how Cochlear assesses, manages and addresses identified supply chain ESG risks.

Existing suppliers are subject to an annual review based on country of origin, sourcing category and spend. We have undertaken an enhanced risk assessment with suppliers with whom our annual spend for FY23 exceeded a monetary threshold (AUD\$50,000 for FY23) and where a potential geographic and sourcing risk exposure has been identified. Suppliers newly identified with a potential high risk exposure are being asked to complete a self-assessment supplier questionnaire in order for Cochlear to measure their modern slavery and other ESG related risks. The topics covered in the questionnaire include labour rights, safety and well-being, environment and sustainability, ethical trading, and ESG-related management.

From FY24, Cochlear intends to incorporate ESG topics during on-site audits of high risk Production-related Suppliers as part of its supply chain assurance program.

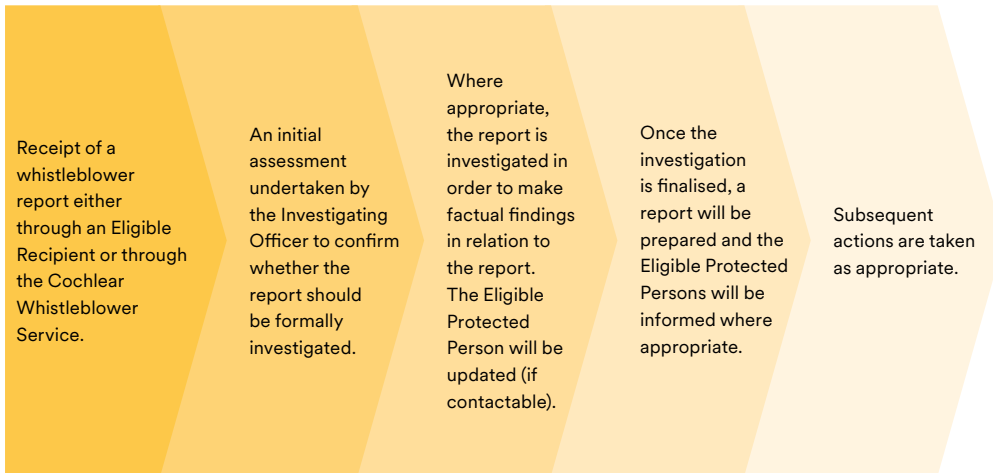


Remediation

Cochlear is committed to creating and maintaining a lawful, ethical and responsible working environment that promotes good corporate governance. Cochlear's Whistleblower Protection Policy empowers Eligible Protected Persons – including current and former suppliers and employees of suppliers – to report any suspected or actual misconduct in relation to Cochlear, including any suspected instances of modern slavery. The Whistleblower Protection Policy is available on Cochlear's website in English and other languages relevant for our global business.

The Cochlear Whistleblower Service is an externally operated confidential service, available anywhere in the world, at any time through which Eligible Protected Persons including current and former suppliers and employees of suppliers are able to anonymously (subject to local laws and regulations) submit reports of any breach of law, regulation or Cochlear policy or procedure including for any breaches of Cochlear's Global Code of Conduct and the Supplier Code of Conduct. The Group General Counsel is notified of each report submitted through the Cochlear Whistleblower Service.

High level overview of steps Cochlear will generally take once a whistleblower report has been received



If Cochlear identifies any practices of concern at a supplier, it will work with the relevant supplier to provide support and take appropriate measures to ensure that the supplier's practices are aligned with Cochlear's standards and expectations as set out in the Supplier Code of Conduct. Suppliers are required under the Supplier Code of Conduct to have a robust corrective action process to drive improvement in safety, sustainability, labour standards and ethical trading principles. Ongoing or repeated non-compliance with the Supplier Code of Conduct may activate a review of the supplier's commercial relationship with Cochlear, and non-compliance of a serious nature or repeated breaches of our Supplier Code of Conduct may result in Cochlear taking further action including but not limited to terminating the supply relationship with the Supplier.



Cochlear contributes to the United Nations Sustainable Development Goals and, as a signatory to the United Nations Global Compact (UNGC), Cochlear supports the UNGC's Ten Principles in the areas of human rights, labour, environment and anti-corruption across our business.



Assessing the effectiveness of actions being taken

In FY23, Cochlear established the Responsible Supply Chain Working Group (**Working Group**), comprised of representatives across cross-functional departments including Global Supply Chain, Sustainability and Risk & Assurance in order to advance the integration of good sustainability and ESG practices in the way in which we select, onboard and manage our suppliers. The Working Group, led by Cochlear's Sustainability team, met twice during FY23 to discuss and align on our focus areas for action in the short and medium term future, and have agreed on the Responsible Supply Chain Action Plan that was subsequently reviewed by Cochlear Limited's Audit & Risk Committee.

During FY23, Cochlear has formally implemented its Supplier Environmental, Social and Governance Risk Assessment Procedure (**Supplier ESG Risk Assessment Procedure**) which outlines how Cochlear assesses, manages and mitigates modern slavery and other ESG risks in our supply chain. The procedure also governs Cochlear's review of ESG risks and actions, and ongoing evaluation of opportunities to improve the assessment, treatment, monitoring and review of ESG risks.

In April 2023, Cochlear conducted a comparative peer analysis on the supply chain management section of its most recent Dow Jones Sustainability Index (**DJSI**) results. Cochlear has also carried out a benchmarking of its FY22 modern slavery statement against those published by other comparable companies in the ASX 100 index. These analyses have demonstrated that whilst our ESG (including modern slavery) risk management and disclosure practices were generally in line with those of our comparable peers, there are also numerous opportunities for further improvement.

Cochlear has recently introduced a new functionality in our supplier management system to allow tagging of our suppliers according to the type of social value that may be generated by purchasing their goods or services and to highlight any potential risks that may need to be addressed, using the newly established WISE framework. The objective of the WISE framework, which includes 'Slavery Prevention' as one of the key categories of social value, is to allow Cochlear to make informed decisions about how we engage with suppliers in a way that creates social value beyond the value of goods or services being purchased.

Consultation

This statement was prepared by a working group of members from Cochlear Limited's Group Risk & Assurance, Legal, People & Culture, Global Supply Chain and Sustainability teams who manage or advise on Cochlear's activities with respect to identifying and addressing modern slavery risks.

Representatives from management teams responsible for providing overall oversight and management of regional subsidiaries which Cochlear Limited owns or controls were consulted and given an opportunity to provide input and feedback during the development of this statement. The statement was presented to Cochlear Limited's Audit & Risk Committee for review. Finally, the statement was presented to the Board of Cochlear Limited for final review and approval.

This statement was approved by the Board of Directors of Cochlear Limited on 12 December 2023.

Dig Howitt
CEO & President

Hear now. And always

Cochlear is dedicated to helping people with moderate to profound hearing loss experience a world full of hearing. As the global leader in implantable hearing solutions, we have provided more than 700,000 devices and helped people of all ages to hear and connect with life's opportunities.

We aim to give people the best lifelong hearing experience and access to next generation technologies. We collaborate with leading clinical, research and support networks to advance hearing science and improve care.

That's why more people choose Cochlear than any other hearing implant company.

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www.cochlear.com

Please seek advice from your health professional about treatments for hearing loss. Outcomes may vary, and your health professional will advise you about the factors which could affect your outcome. Always follow the directions for use. Not all products are available in all countries. Please contact your local Cochlear representative for product information.

ACE, Advance Off-Stylet, AOS, Ardium, AutoNRT, Autosensitivity, Baha, Baha SoftWear, BCDrive, Beam, Bring Back the Beat, Button, Carina, Cochlear, 科利耳, コクレア, 코클리어, Cochlear SoftWear, Contour, 콘트우아, Contour Advance, Custom Sound, DermaLock, Freedom, Hear now. And always, Hugfit, Human Design, Hybrid, Invisible Hearing, Kanso, LowPro, MET, MP3000, myCochlear, mySmartSound, NRT, Nucleus, Osia, Outcome Focused Fitting, Off-Stylet, Piezo Power, Profile, Slimline, SmartSound, Softip, SoundArc, True Wireless, the elliptical logo, Vistafix, Whisper, WindShield and Xidium are either trademarks or registered trademarks of the Cochlear group of companies.

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