

## **Human Rights and Anti-Modern Slavery Statement**

Revised Version

### *Revision Note*

This statement was originally submitted on 04.07.2025.

It was revised on 15.12.2025 to reflect approval by the Board of Directors of Medartis AG, in their capacity as the principal governing body, in compliance with section 13 of the Australian Modern Slavery Act 2018.

### **Introduction**

This Statement is published pursuant to the UK Modern Slavery Act (2015), the Australia Modern Slavery Act (2018) and the Swiss Code of Obligations (Art. 964j–k). It summarizes the key actions Medartis has taken in the fiscal year ending 31 December 2024 to respect human rights and prevent modern slavery in its own operations and relevant areas of its supply chain.

### **About Medartis**

#### **Organizational Structure and Supply Chains**

Medartis is a Swiss-headquartered, globally active medical device company specializing in osteosynthesis solutions. As of 2024, the company operates two main production facilities in Basel (Switzerland) and Warsaw (Indiana, USA), and maintains a presence in over 50 countries through its network of regional subsidiaries, sales offices, and distributors. The company focuses on the development, manufacturing, and distribution of osteosynthesis implants for cranio-maxillofacial, upper and lower extremities. Key procurement categories include medical-grade titanium and stainless steel, precision-machined components, sterile barrier systems, and customized packaging materials. These goods are predominantly sourced from suppliers located in Switzerland and from neighboring European countries as well as from the USA.

Our supply chain is structured and managed centrally by our global Procurement and Quality departments. While regional entities provide operational support in selected areas such as logistics coordination or supplier communication, strategic sourcing, supplier

qualification, and risk-based due diligence processes are conducted centrally. We maintain high ethical, legal, and operational standards across the supply base.

## **Governance and Consultation with Controlled Entities**

The oversight of the implementation of our human rights commitments lies with the Board of Directors. Day-to-day responsibility rests with the Sustainability, Compliance, Procurement, and Legal teams. Medartis' human rights and modern slavery prevention measures are coordinated centrally through the Group's headquarters in Basel, Switzerland, which also hosts the company's main production site and global procurement functions. Key compliance processes – such as supplier risk assessments, due diligence reviews, and policy implementation – are managed directly by Group-level teams. Our subsidiaries primarily act as local sales and distribution units and are therefore not involved in supplier selection or procurement activities. Nevertheless, they are fully bound by the Group's compliance framework, including the Supplier Code of Conduct and whistleblowing procedures. This ensures consistency and accountability across all entities, while enabling a streamlined and efficient governance structure.

## **Policies & Positions**

Our commitments are guided by international frameworks including the UN Guiding Principles on Business and Human Rights, ILO Core Conventions, and the OECD Guidelines. Medartis maintains the following policies:

- Supplier Code of Conduct
- [Global Compliance Policy](#)
- [Corporate Social Responsibility Policy](#)
- EHS Guidelines
- ETI Base Code

Medartis expects its suppliers to operate in a lawful manner and uphold high standards of integrity and ethical conduct. To support these expectations, the company has developed a Supplier Code of Conduct, which outlines key legal, ethical, and behavioral requirements. The Code specifically prohibits suppliers from participating in, promoting, or supporting

slavery or human trafficking. It also requires suppliers to comply with all relevant laws on these issues in the countries where they operate.

Suppliers are further expected to take appropriate and reasonable actions to ensure that their subcontractors and sub-suppliers also adhere to the Supplier Code of Conduct. If any issues of non-compliance arise, suppliers must promptly take corrective action, maintain appropriate records to demonstrate compliance, and report any concerns or suspected violations through the company's whistleblowing system.

The use of forced labor, human trafficking, and child labor is explicitly banned under the Code. Should a supplier be found in violation of these standards, Medartis will take swift corrective steps. The company also reserves the right to end its relationship with any supplier that fails to comply with the Supplier Code of Conduct.

## **Due Diligence**

Our risk-based due diligence covers:

- Annual risk-based mapping of supply chain and country/sector risk assessment
- On-site Audits
- Remediation measures and corrective action plans if risks are found

We are preparing to implement the following due diligence checks in 2025 / 2026:

- Annual review of Supplier self-assessments
- Audits and certification review (e.g. ISO, SA8000)

We assess risk annually. In 2024, no confirmed cases of forced or child labour were identified. Our due diligence found no reportable conflict metals volumes, and all assessed suppliers met the legal thresholds. Both checks are important safeguards against exploitative practices in high-risk regions and contribute to our broader efforts to prevent modern slavery.

In 2024, more than 6'400 articles and around 2'340 different materials purchased have been assessed.

## **Training & Awareness**

All employees receive training on our Global Compliance Policy and our Corporate Social Responsibility Policy, which include topics on human rights, good market practices and whistleblower protection.

## **Monitoring**

We recognize the importance that tracking effectiveness plays in supporting continuous improvement of our approach to respecting human rights, including fair working conditions, anti-modern slavery and child labor. Medartis undertook the following steps to assess its 2024 performance:

- Rolled out supplier assessments with a focus on child labour, conflict metals
- Prepared the revision of our supplier code of conduct
- Corporate Social Responsibility Training

We will continue to refine our due diligence and monitoring framework in 2025, ensuring alignment with evolving regulatory expectations and industry best practices.

## **Grievance mechanisms**

Medartis has more than one reporting channel, with the aim of facilitating access to reports. One of these channels is via email, through which the Global Ethics Committee receives and handles the report. It also offers emails related to the Local Committees and provides a reporting channel with the option of anonymity on its official website.

The confidentiality and secrecy of the whistleblower are preserved in all cases. In addition, Medartis has a protection and non-retaliation/victimization rule in place to safeguard employees after reporting a violation/doing a complaint, cooperating in internal investigations, or serving as a witness. That's applicable even if the claim turns out to be unfounded, if made in good faith.

## Conclusion

Medartis is committed to continuous improvement in its efforts to identify, prevent and address human rights risks and modern slavery within its own operations and global supply chain. As we make progress, we will transparently report on it through future versions of this statement and related disclosures.

This statement was approved by the Board of Directors of Medartis AG in their capacity as the principal governing body on 15.12.2025.



Nadia Tarolli Schmid

Member of the Board of Directors

Chair of Finance & Audit Committee and Sustainability delegate