



About this Statement

For the purposes of this Modern Slavery Statement the reporting entity is Boston Scientific Pty Ltd (**BSPL**) (ACN 071 676 063). BSPL has no subsidiaries.

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the **Act**) on behalf of BSPL. References to 'we' or 'us' or 'our' are references to BSPL. References to 'Boston Scientific' refer to the Boston Scientific Corporation more broadly.

As a subsidiary of Boston Scientific, BSPL is committed to maintaining the highest standards of legal and ethical conduct and to conducting its business in a manner that reflects the Boston Scientific Code of Conduct.

We recognise that companies have a responsibility to respect human rights within their own operations and business relationships and to take steps to identify and eliminate modern slavery in their business operations and supply chains.

BSPL is committed to these objectives and fully supports the Modern Slavery Act 2018 (Cth).

This is BSPL's first modern slavery statement and relates to the financial year commencing 1 January 2020 and ending 31 December 2020 (FY20).

1 Our business

1.1 About BSPL

Boston Scientific is dedicated to transforming lives through innovative medical solutions that improve the health of patients around the world. We are a worldwide developer, manufacturer and marketer of medical devices that are used in a broad range of medical specialties. These products are generally sold directly or through distributors and agents to hospitals or physicians, making Boston Scientific the final step in the supply chain prior to these products reaching the end customer.

Our products were offered for sale by seven core businesses: Interventional Cardiology ("IC"), Peripheral Interventions ("PI"), Cardiac Rhythm Management ("CRM"), Electrophysiology, Endoscopy, Urology and Pelvic Health, and Neuromodulation.

Our seven businesses are organized in three segments:

Cardiovascular segment. In IC, we focus on technologies for diagnosing and treating coronary artery disease and other cardiovascular disorders that affect large patient populations. We also offer structural heart products, which include devices for transcatheter aortic valve replacement and an alternative to blood thinners for reducing atrial fibrillation stroke risk. Our PI business develops solutions designed to treat peripheral artery disease, deep vein thrombosis and cancer. Following the completion of the acquisition of BTG plc during the third quarter of 2019, we began to integrate BTG's Oncology portfolio into the PI division, adding complementary technologies in the areas of venous disease and interventional oncology.

Rhythm and Neuro segment. In CRM, we provide innovative technologies for the treatment of cardiac arrhythmias, heart failure and sudden cardiac arrest, for example, implantable cardioverter defibrillator systems and pacemaker systems.



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Our Electrophysiology business develops less-invasive medical technologies used for diagnosing and treating complex arrhythmias. Our Neuromodulation business offers microelectronic implantable technologies to help manage chronic pain and neurological conditions.

MedSurg segment. In Endoscopy, we offer devices to diagnose and treat a variety of gastrointestinal and pulmonary conditions. Our Urology and Pelvic Health business focuses on solutions for urological, urogynecological and gynaecological diseases.

BSPL is an Australian proprietary company that is part of the Boston Scientific Group and its ultimate parent is Boston Scientific Corporation. BSPL is responsible for medical, sales and marketing activities in Australia of products licensed and/or manufactured by Boston Scientific.

BSPL employs approximately 300 people across Australia and New Zealand, with its head office in Sydney. We also have offices in Brisbane, Melbourne, Adelaide, Perth, and Auckland.

1.2 Our operations

BSPL is responsible for medical, sales and marketing activities in Australia and New Zealand of products licensed and/or manufactured by Boston Scientific. BSPL does not undertake manufacturing activities.

BSPL's largest supply operations consist of importation of finished goods from the manufacturing facilities around the world e.g. Quincy, United States, Kerkrade, Netherlands, Clonmel, Ireland owned and operated by Boston Scientific Group. BSPL direct supply chain is primarily related to the following operations:

- Product marketing promotion and sales throughout Australia;
- Product storage and distribution throughout Australia;
- Clinical research, clinical studies and medical education/support services;
- Physician training and Patient disease awareness programs; and
- Other activities to support the above.

1.3 Our supply chain

The products marketed and distributed by BSPL into the Australian Market are sourced from Boston Scientific's manufacturing sites across the regions, concentrated in the United States, European Union, Asia Pacific Region, and local market.

BSPL also procures/consumes a number of goods and services that are not resupplied to customers, but which are required by its internal stakeholders to support its effective operations. These are mainly local companies and include HR payroll, IT, marketing, logistics, warehouse, transportation, travel management, and market research.

2 Our risks

Our suppliers are integral to the supply chain function of our company. We expect suppliers to treat their employees with dignity and respect and to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees. All suppliers are expected to understand and comply with Boston Scientific Code of Conduct and Third-Party Code of Conduct. Additionally, in contractual agreements, we require our suppliers to comply with all applicable laws and regulations.

To assess modern slavery risks, BSPL has considered external data sources and consulted with external experts. We have a global compliance program on our suppliers, regardless of their locations, we consider the risk of modern slavery within our operations and in these internal supply chains to be very low.

BSPL also verifies and ensures all Australian based employees and contractors have the right to work in Australia. We also conduct audits to ensure that the HR processes are in accordance with local legislations/requirements.

3 Our actions

We are committed to conducting business with suppliers who adhere to the highest ethical standards and comply with laws and regulations applicable to their business, including laws related to human trafficking and slavery.

We have strong engagement with our suppliers through supply agreements, quality agreements and/or purchase order terms and conditions. These contracts include agreement to comply with all laws and regulations applicable to the supply of the service or material.

3.1 Policies and procedures

We have adopted the following policies to address our approach to the effective identification of modern slavery risks and the steps necessary to prevent such risks in our operations.

- **Boston Scientific's Code of Conduct:** This is the foundation for our existing policies. All employees, including employees responsible for supply chain management, are required to comply with the Code. All employees participate in annual training on the Code which includes training on ethical decision making and upholding laws and regulations, to ensure understanding and compliance with the requirements of the Code. In 2019, we completed a year-long effort to update the Boston Scientific Code of Conduct. Changes range from additional language about our Corporate Social Responsibility (CSR) commitment to expanded provisions on conflicts of interest and patient and data privacy. The updated Code of Conduct went into effect on January 1, 2020. To promote compliance with the Code, we maintain a compliance program that conducts regular audits of the requirements under various compliance policies, investigates potential violations of the Code and takes disciplinary action when necessary.



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- **Supplier's Code of Conduct:** Prior to engagement of a supplier, we evaluate the supplier through a risk-based assessment, which may include supplier questionnaires and audits of supplier facilities. Our expectations for compliance with ethical and quality standards are communicated to all potential suppliers. These principles and expectations are articulated in our Third-Party Code of Conduct.
- **Advice line:** a toll-free number that anyone (including our employees and suppliers) can call, 24 hours a day, seven days a week, to obtain guidance, report an integrity concern, or suspected violation of the Code of Conduct or other policy.

3.2 Due diligence and managing modern slavery risks

In support of the above, Boston Scientific and BSPL have other processes in place to manage potential modern slavery risks:

- (a) Responsible sourcing; and
- (b) Supplier selection and management

Evaluating potential partnerships against our strict criteria takes time, but partnerships with responsible suppliers are a fundamental component of our commitment to human rights, environmentally sustainable practices, as well as business continuity and risk mitigation strategy. Among other areas, a potential new supplier is evaluated based on its commitment to responsible business practices, sustainability, and social responsibility. This includes a review of the supplier's corporate information, core values, and code of conduct policies to assess commitment and adherence to responsible business practices.

3.3 Grievance mechanisms

We maintain an advice line whereby employees and third parties, including suppliers, may ask questions, obtain guidance, or report concerns. Employees and business partners are encouraged to raise questions when they need guidance or clarification and to report any concerns or suspected violations of the Code of Conduct, other Company policies, procedures and/or applicable laws.

4 Assessing our actions

We continually review the effectiveness of our policies and procedures with respect to modern slavery risk through assessment and/audits of our third-party service providers. We will consider the need for additional ways to assess the effectiveness of our actions.

5 Consultation and approvals

This statement was prepared in consultation with our finance, procurement, legal and regulatory teams.



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This statement was approved by the Leadership Team and Board of Directors of Boston Scientific Pty Ltd on 9 November 2021.

Signed for and on behalf of Boston Scientific Pty Ltd

Director

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Martin Baker
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Martin Baker