



SomnoMed Limited

ACN 003 255 221

Modern Slavery Statement

Contents

Contents	2
1. Introduction	3
2. Our Structure, Operations and Supply Chains.....	3
3. Risks of Modern Slavery in Our Operations and Supply Chains	5
4. Actions Taken to Assess and Address Risks	5
5. Effectiveness of Our Actions.....	8
6. Remediation.....	8
7. Consultation	8
Appendix:	9

SomnoMed Limited – Modern Slavery Statement

Financial Year 2025

1. Introduction

This Modern Slavery Statement is made pursuant to the Australian **Modern Slavery Act 2018 (Cth)** and outlines the actions taken by **SomnoMed Limited (SomnoMed)** during the financial year ending 30 June 2025 to assess and address risks of modern slavery in our operations and supply chains.

SomnoMed is committed to conducting business ethically and with integrity. SomnoMed recognise that modern slavery can take many forms, including forced labour, child labour, human trafficking, servitude, and deceptive recruitment practices. SomnoMed are resolute in our efforts to eliminate these risks across our global operations.

2. Our Structure, Operations and Supply Chains

Reporting Entities

This is a statement for a single reporting entity under Section 16 of *Australian Modern Slavery Act 2018*. The statement includes SomnoMed Limited and its subsidiaries, collectively referred to as **SomnoMed** in this statement.

Structure

SomnoMed Limited, founded in 2004 is an Australian publicly listed company on the Australian Stock Exchange (ASX: SOM) with its registered business address as Level 3, 20 Clarke Street, Crows Nest, NSW 2065. SomnoMed operates in over 20 countries through a network of subsidiaries across North America, Europe, and Asia-Pacific. These entities are involved in manufacturing, distribution, and support services for SomnoMed's medical devices.

The SomnoMed group includes the following operational subsidiaries controlled by SomnoMed Limited:

Subsidiary	Country of Incorporation	Subsidiary	Country of Incorporation
SomCentre Pty Limited	Australia	SomnoMed AG	Switzerland
SomnoDent Pty Limited	Australia	SMH Biomaterial AG	Switzerland
SomnoMed Pte Ltd	Singapore	SomnoMed Netherlands BV	Netherlands
SomnoMed Corporation Japan	Japan	Goedegebuure Slaaptechniek BV	Netherlands
SomnoMed Korea	South Korea	SomnoMed Germany GmbH	Germany
SomnoMed Taiwan Limited	Taiwan	SomnoMed Service GmbH	Germany
SomnoMed Philippines Inc. (SPI)	Philippines	SomnoMed UK Limited	UK
SomnoMed, Inc.	USA	SomnoMed Nordic AB	Sweden
SomnoMed Canada Inc.	Canada	SomnoMed France	France
		SomnoMed Spain SL	Spain
		SomnoMed Italy S.r.L	Italy
		SomnoMed Finland OY	Finland

Operations

SomnoMed is a leading medical device company specialising in the development of oral appliances for sleep apnea treatment. SomnoMed are headquartered in Australia and operate with a dedicated workforce that prioritises patient care and innovative solutions.

SomnoMed leads the world in the development of OSA devices with each appliance custom manufactured using state-of-the-art technology delivering precision, comfort, and first-time fit solutions. Our devices are 510(k) cleared by the FDA (Food and Drug Administration) and manufactured in accordance with the ISO 13485:2016 quality standard.

SomnoMed's operations are structured as below:



*Sales hub activities include:

- Review and acceptance of orders from customers
- Transfer of orders to SPI for manufacturing
- Acceptance of orders back from SPI for final inspection and packaging
- Coordination of logistics for delivery to customers & after sales service

Supply Chain

SomnoMed recognises that modern slavery risks can be present at various stages of the supply chain, particularly in industries and regions where labour rights protections may be limited. Our supply chain includes the following:

- Purchase of medical device components and raw materials
- Manufacturing medical devices
- Packaging and shipping finished medical devices to customers
- Marketing and promotional materials
- IT and professional services

SomnoMed's main suppliers of raw materials are based in Germany, China, Philippines and Turkey. Other suppliers (software) are based predominately in the US and Denmark.

3. Risks of Modern Slavery in Our Operations and Supply Chains

SomnoMed is committed to making efforts to identify modern slavery risks throughout our value chain and addressing them where they exist. These efforts extend to our internal operations and throughout the various tiers of our supply chain. SomnoMed recognise that defeating modern slavery is a complex, long-term challenge. SomnoMed strive to continue to develop and strengthen our modern slavery program as our company continues to grow and expand its workforce and product portfolio.

SomnoMed has identified potential modern slavery risk areas or factors relating to the company's operations and supply chain and added controls to mitigate these risks:

High risk factors

- Unfair labour practices and employment conditions
- Vulnerable worker groups and the use of subcontracting
- Unsafe working environment & oversight
- Sourcing and procurement risks

High risk regions

- China
- Turkey
- Philippines

4. Actions Taken to Assess and Address Risks

Over the past year, SomnoMed have continued to utilise our existing solutions while strengthening our actions to assess modern slavery risks. This has been achieved through a risk-based approach focused on onboarding suppliers, recruitment, monitoring supplier performance, and updating our Supplier Code of Conduct.

SomnoMed has implemented a number of actions in order to identify, assess and address the risks identified above.

Policies and Governance

SomnoMed recognises the importance of good corporate governance and the role it plays in ensuring business is conducted honestly, fairly, and legally. SomnoMed is committed to adopting corporate governance policies to achieve the objectives of acting ethically and responsibly, safeguarding the integrity in corporate reporting, making timely and balanced disclosures, and recognising and managing risk.

The governance structure at SomnoMed involves several key leadership bodies. The Board of Directors oversees the company's management, administration, and strategic direction. The Audit & Risk Committee ensures effective risk management systems, policies, and internal controls are in place including suitable safety practices. The Executive Leadership, comprising the Co-CEOs and Group Leadership Team (GLT), are responsible for implementing and managing labour rights standards, with the GLT accountable for internal and supplier-related improvements. Lastly, Operations Leadership ensures appropriate operational policies and practices and responsible sourcing through suitable vendors.

As part of our ongoing reporting and risk management practices, SomnoMed will continue to update its modern slavery related policies and procedures, implement training and internal education programs for its employees on modern slavery awareness, report at least annually to the board on modern slavery risks and develop and update its supply chain mapping as SomnoMed expands its business.

SomnoMed has key Corporate Governance policies, codes and procedures which are publicly available on the SomnoMed website to help provide a framework for modern slavery risk management.

There are several policies and procedures currently in force to mitigate modern slavery risks in SomnoMed's supply chain. These include the following policies:

The Code of Conduct & Core Values

The Code sets the expected standard of conduct for all employees and contractors at SomnoMed, by embracing a high standard of ethical behaviour, integrity and honesty.

Actions taken:

The Code is periodically reviewed by senior executives with any update approved by the Board. Employees are given access to the Code of Conduct as part of their onboarding and requested to sign off on the Code of Conduct and Ethics questionnaire. Any updates to the Code are communicated to all employees and also included in Employee handbooks (where applicable). The company is undertaking a review of onboarding to increase consistency across regions. The Code is also published online so any contractors and third parties that conduct business with SomnoMed can access it and understand SomnoMed's approach to sound corporate governance practices.

SomnoMed has also reviewed the Core Values and communicated to all employees the updated Values that support the business of the future.

The Supplier Code of Conduct (SCOC)

The SCOC formalises the standards SonmoMed expect all our suppliers and contractors to adhere to. These standards relate to labour practices, environment and sustainability, business integrity, and audit and assurance processes.

Actions taken:

Our onboarding process for all new suppliers requires review, acceptance and confirmation of compliance with our SCOC. The SCOC is also published online on the SomnoMed's website.

Whistleblower Protection Policy

(Speak Up Privacy Policy)

The purpose of this policy is to empower any Eligible Disclosers to report suspected or actual Reportable Conduct without fear of retaliation, victimisation or disadvantage.

Actions taken:

The Whistleblower Protection Policy is periodically reviewed by executives with any update approved by the Board. Our Speak Up line is monitored to address any issues raised.

Disciplinary and Grievance Policy

The purpose of this policy is to addresses workplace grievances, aiming for a harmonious environment by resolving conflicts promptly and fairly. This policy applies to employees only.

Actions taken:

The Grievance Policy is made available to employees via the internal intranet. The Policy will be next reviewed in FY26 as part of our standard review process.

Training

We are committed to providing all employees at SomnoMed training on key company policies that support efforts to address modern slavery. These include:

Modern Slavery Training: Designed to help employees and suppliers understand, identify, and respond to risks related to forced labour, human trafficking, and other forms of exploitation within business operations and supply chains.

Diversity Policy: Aims to foster a workplace where all employees have equal access to career opportunities, training, and benefits. It promotes fairness and respect, ensuring individuals are not discriminated against based on gender, age, ethnicity, race, cultural background, disability, religion, sexual orientation, or caring responsibilities.

Anti-Discrimination & Harassment Policy: Promotes a safe, respectful, and inclusive work environment by preventing discrimination, harassment, and bullying. It also outlines clear procedures for addressing any breaches of conduct.

Workforce hire and recruitment

SomnoMed is committed to fair and lawful employment practices across all its operations. Employees are hired under legally compliant employment agreements, receive wages at or above industry award rates, and work in safe and regulated conditions. The majority of our workforce is based in countries with robust labour laws and well-established employee protections.

At our manufacturing facility, work hours and shifts are closely monitored to ensure full compliance with local labour regulations, governed by the Department of Labour and Employment. To uphold fair labour standards and meet minimum wage requirements, SomnoMed partners with local human resource firms that specialise in regional employment practices.

All employees are free to join unions or other labour organisations, supporting their right to collective representation.

Supplier monitoring

SomnoMed ensures responsible sourcing through a comprehensive supplier vetting process. All new suppliers undergo human rights compliance assessments, while existing suppliers are reviewed at contract renewal. Prior to long-term engagements, supplier reviews are conducted, and suppliers must provide relevant registrations and quality certifications. They are also required to sign SomnoMed's Supplier Code of Conduct and provide references for material contracts. Site inspections are carried out when deemed necessary.

Future Commitments

In FY2025/26, SomnoMed will:

- Update risk management policies and governance frameworks
- Expand supplier engagement and training programs
- Integrate modern slavery considerations into procurement and contract management systems
- Explore third-party tools for enhanced supply chain risk analysis

5. Effectiveness of Our Actions

To assess the effectiveness of our actions, SomnoMed:

- Monitor supplier compliance through audits and questionnaires
- Track training completion rates
- Review incident reports and whistleblower disclosures
- Benchmark against industry standards and peer organisations

SomnoMed are committed to continuous improvement and will refine our approach based on feedback and evolving risks.

6. Remediation

SomnoMed's management is dedicated to fostering a culture of ethical and responsible practice, as well as establishing robust and effective risk identification, management and reporting protocols, as outlined in our Corporate Governance Statement and Code of Conduct and Core Values. A key component to this is ensuring employees and all other stakeholders have a recourse mechanism for raising any concerns relating to ethical malpractice, including human rights and modern slavery incidence. SomnoMed's Whistleblower Policy outlines a clear mechanism for raising concerns. It is available to all employees via our company intranet, published on the SomnoMed website and included in induction materials for all new starters. In addition, SomnoMed has introduced a Speak Up hotline (Speakup® Platform), an independent, externally managed platform, to report on internal/external areas of concern. SomnoMed treats reports of known or suspected breaches of company policy and applicable laws very seriously. Disclosures made through our Whistleblower mechanism that are identified as significant potential or actual violations of our policy or law are investigated. Where such disclosures are substantiated, corrective action is applied commensurate to the nature of the violation.

7. Consultation

This Modern Slavery Statement is a result of consultation and collaboration between multiple departments within SomnoMed, and between the entities covered by this statement including the Reporting Entity and entities owned and/or controlled by that entity. This is a testament to our shared values, policies and governance frameworks, together with a belief in the importance of actions to address Modern Slavery risks. SomnoMed recognises the need to continuously build on our understanding, oversight and management of modern slavery risks in our operations and supply chains. SomnoMed continue to progress the enhancements of our mitigation actions within our operations and supply chain.

This statement was approved by the Board of SomnoMed on 29 October 2025.



Amrita Blickstead
Co-CEO



Karen Borg
Co-CEO

Appendix:

The mandatory reporting criteria in the Modern Slavery Act are addressed in our Modern Slavery Statement, as indicated in the table below:

Mandatory Criteria	Section
Structure, Operations and Supply Chains Describe the reporting entity's structure, its operations (including countries of operation), and its supply chains.	2
Risks of Modern Slavery Practices Identify the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3
Actions Taken to Assess and Address Risks Outline the actions taken to assess and address those risks, including due diligence and remediation processes.	4 & 6
Effectiveness of Actions Describe how the reporting entity assesses the effectiveness of the actions it takes to address modern slavery risks.	5
Consultation Process Detail the process of consultation with any entities the reporting entity owns or controls in preparing the statement.	7
Other Relevant Information Include any other information that the reporting entity considers relevant.	n/a
Approval and Signature The statement must be approved by the principal governing body of the entity and signed by a responsible member.	7