

About this Statement

This modern slavery statement is made pursuant to the *Modern Slavery Act 2018* (Cth) on behalf of Boston Scientific Pty Ltd (**BSPL**) (ACN 071 676 063).

BSPL is an Australian proprietary company and its ultimate parent company is Boston Scientific Corporation. BSPL is responsible for sales and marketing activities in Australia of products manufactured by Boston Scientific Corporation.

BSPL has no subsidiaries.

This is BSPL's fourth modern slavery statement and relates to the reporting period commencing 1 January 2023 - 31 December 2023 (FY23).

References to 'we' or 'us' or 'our' or 'Boston Scientific' are references to Boston Scientific Corporation more broadly.

As a subsidiary of Boston Scientific Corporation, 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 (our **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).

1 Our Structure, Operations and Supply Chain

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 global developer, manufacturer and marketer of medical devices that are used in a broad range of interventional medical specialties.

Our Global Supply Chain team supports more than 20 key locations around the world with our principal manufacturing facilities and distribution centres¹ located in countries where the prevalence of modern slavery is categorised as low/low-medium risk by Global Slavery Index².

¹ Malaysia, Brazil, Israel, United States of America (including Puerto Rico), Costa Rica, United Kingdom, The Netherlands, Canada, Japan and Ireland.

² Global Slavery Index is generated through the work of Walk Free, an international human rights group working to accelerate the end of all forms of modern slavery. The Global Slavery Index, the world's most comprehensive data set on modern slavery.

Our 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.

During 2023, our products were offered for sale by five core businesses:

- **Endoscopy:** Our Endoscopy business develops and manufactures devices to treat a broad range of gastrointestinal and pulmonary conditions with innovative, less invasive technologies.
- **Urology:** Our Urology business develops and manufactures devices to treat various urological conditions for both male and female anatomies, including kidney stones, benign prostatic hyperplasia, prostate cancer, erectile dysfunction and incontinence.
- **Neuromodulation:** Our neuromodulation business develops and manufactures devices to treat various neurological movement disorders and manage chronic pain.
- **Peripheral Interventions (PI):** Our PI business develops and manufactures products to diagnose and treat peripheral arterial and venous diseases, as well as products to diagnose, treat and ease various forms of cancer.
- **Cardiology:**
 - **Interventional Cardiology Therapies (ICTx):** Our ICTx business develops and manufactures technologies for diagnosing and treating coronary artery disease and aortic valve conditions.
 - **Watchman:** Our WATCHMAN FLX™ Left Atrial Appendage Closure (LAAC) Devices are designed to close the left atrial appendage in patients with non-valvular atrial fibrillation who are at risk for ischemic stroke.
 - **Cardiac Rhythm Management (CRM):** Our CRM business develops and manufactures a variety of implantable devices that monitor the heart and deliver electricity to treat cardiac abnormalities.
 - **Electrophysiology (EP):** Our EP business develops and manufactures less-invasive medical technologies used in the diagnosis and treatment of rate and rhythm disorders of the heart, including a broad portfolio of therapeutic and diagnostic catheters and a variety of equipment used in the electrophysiology lab.

Whilst the Boston Scientific product portfolio is broad in scope, Boston Scientific does not import into Australia any of the top ten high-risk products for modern slavery and human trafficking for use in our final products³.

1.2 BSPL Operations and People

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

³ Walk Free Global Slavery Index 2023 Report pg. 4 and 94

BSPL employs approximately 310 people in Australia with its head office in Sydney, Australia. BSPL also has offices in Brisbane, Melbourne, Adelaide and Perth.

All full time, part time or fixed term employees of BSPL are employed pursuant to contracts of employment and in line with the requirements of the *Fair Work Act 2009 (Cth)*.

BSPL 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 legislation and requirements.

BSPL's operations are supported by employees of other Boston Scientific entities across the globe, including IT and other shared service support provided from the Asia Pacific region. The Boston Scientific Code of Conduct outlines expectations for all employees to ensure the health, safety and well-being of employees and to maintain a safe, healthy and secure work environment, wherever employees are located.

1.3 Boston Scientific Employee Compliance and Ethics

We are committed to acting ethically and with integrity in all our working relationships, inside and outside the company and in compliance with all applicable laws. We support this commitment through our robust global compliance program. People and partners across our brands and supply chain trust our ethics and our track record of responsibility.

The Boston Scientific Global Compliance team provides employee training and resources for conducting business responsibly, treating customers and suppliers fairly and reporting any ethics concerns. The team is led by our chief compliance officer, who reports to the full Boston Scientific Board of Directors annually, the Risk Committee quarterly and to the Audit Committee as warranted. Our compliance experts collaborate with teams across the business to monitor compliance with Boston Scientific policies and applicable laws. In 2023, we allocated additional data analytics resources to strengthen the effectiveness of our Global Compliance team.

Every Boston Scientific employee is required to read, understand and follow the Boston Scientific Code of Conduct, the foundation for all of our business practices and relationships. Annual Code of Conduct training is mandatory for all employees and available in 19 languages. We regularly refresh training content based on updates to company policies, processes and compliance-related risks. Our Advice Line allows anyone to confidentially ask a question and/or report a concern related to compliance, ethics and/or integrity at Boston Scientific. It is operated by a third-party vendor and available 24 hours a day, seven days a week in 61 languages. Information about Boston Scientific's Advice Line is communicated to employees as part of on-boarding and reinforced through annual Code of Conduct refresh training and global Integrity Week campaigns plus other compliance campaigns, such as encouraging Managers to have an "Open Door" to ensure employees feel comfortable raising questions and concerns. In 2023, 80% of concerns reported were made directly by an employee to a resource designated in the Code of Conduct (e.g., Compliance, HR, Manager, etc.), highlighting the success of the "Open Door" initiative.

Further, Boston Scientific has a strict non-retaliation policy, whether direct or indirect against an individual who raises a concern in good faith. This protection extends to anyone who assists with, or cooperates in, an investigation of such a report.

1.4 Our supply chain

Direct Sourcing:

The products marketed and distributed by BSPL into the Australian market are sourced from manufacturing and distribution facilities owned and operated by Boston Scientific around the world.

During 2023, the majority of products distributed to BSPL as finished products were manufactured and/ or distributed by Boston Scientific facilities located in the United States of America, the Netherlands, Ireland and Malaysia.

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.

Indirect Sourcing and support functions:

BSPL also procures/consumes a number of goods and services for use in its everyday operations. These goods and services include logistics, transportation, warehousing, telecommunications and IT services, professional services, travel and accommodation, facilities management and cleaning.

2 Our risks

To assess modern slavery risks, Boston Scientific carries out monitoring and consults with external third parties as part of a supply chain resiliency program. As outlined below, we have assessed the risks of modern slavery and human trafficking for BSPL's employees, direct supply chain and indirect supply chain to be low. However, we acknowledge that the global nature of our operations and the fact that indirect sourcing involves downstream sourcing activities we do not have full visibility of, raises some potential risks.

Employees

The risk of modern slavery for our direct employees in Australia is very low due to BSPL's local and Boston Scientific's global policies, the fact that we have skilled and non-seasonal employees and the workplace laws that exist in Australia. While the global nature of Boston Scientific's

operations brings higher inherent risks, we consider the risk of modern slavery risks to be low because of the global controls Boston Scientific has in place.

Direct Supply Chain

BSPL sources finished products from Boston Scientific owned manufacturing and distribution facilities around the world.

As Boston Scientific controls and operates manufacturing and distribution facilities, noting the controls in place as outlined below and taking into account the geographical locations BSPL sourced from during 2023 (predominantly United States of America, the Netherlands, Ireland and Malaysia) we consider the risk of modern slavery in our direct sourcing activities to be low.

Indirect sourcing

As most of BSPL's indirect sourcing activities occur in Australia and New Zealand, given the corporate governance and industrial relations frameworks in these countries, we believe the risks of modern slavery in relation to indirect sourcing activities to be low. While BSPL is not directly involved in activities such as the corporate cleaning and maintenance of office buildings, we recognize these are sectors with known modern slavery risks.

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 work to advance principles of human rights as recognized and understood by the international community, which include freely chosen employment, avoidance of child labour, reasonable working hours, fair wages and benefits, and humane treatment.

3.1 Policies and procedures

We have adopted the following policies and procedures to effectively identify and mitigate modern slavery risks in our operations.

- **Boston Scientific's Code of Conduct:** All employees, including employees responsible for supply chain management, are required to comply with our Code of Conduct. All employees participate in annual training on the Code of Conduct which includes training on ethical decision making and upholding laws and regulations, to ensure understanding and compliance with the requirements of the Code of Conduct. To promote compliance with the Code of Conduct, we maintain a compliance program that conducts regular audits of the requirements under various compliance policies, investigates potential violations of the Code of Conduct and takes disciplinary action when necessary.
- **Evaluation of Suppliers and Supplier 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 each potential supplier ahead of any engagement. Our Supplier Code of Conduct sets forth Boston Scientific's expectations for its suppliers regarding corporate responsibility in the supply chain and provides information and guidance on how to conduct business with ethics and integrity.

- **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. In 2022, we also launched an advice line website to make it easier for employees to report ethics and integrity concerns.

3.2 Due diligence and managing modern slavery risks

BSPL has in place responsible sourcing and supplier selection and management processes to assess and mitigate modern slavery risks.

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 strategies. Potential new suppliers are evaluated based on their commitment to responsible business practices, sustainability, and social responsibility, among other areas. This includes a review of the supplier's corporate principles, core values and code of conduct policies to assess commitment and adherence to responsible business practices, including upholding human rights and vigilance against 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 materials in all relevant jurisdictions. Our Supplier Quality team is responsible for ensuring that our suppliers understand what is required to meet Boston Scientific's quality standards.

We monitor our supplier performance through desktop and on-site audits, while continually monitoring incoming material key performance indicators to confirm compliance with performance and quality standards. Additionally, we have in place a Supplier Resiliency and Risk program which uses internal systems as well as a third-party platform to monitor risk. The system alerts us to supply issues throughout our supply chain based on publicly available information, including those presenting risks related to corporate responsibility.

Boston Scientific provides internal training on supply chain risks to over 850 global sourcing employees who manage these risks and continues to develop its training programme to meet business needs.

3.3 Grievance mechanisms

As noted above, 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.

Due to the technical complexity of many of our products, our supply chain requires skilled non-seasonal workers, reducing the risk of modern slavery in our business. Despite this we remain vigilant throughout our supply chain to identify and eliminate modern slavery risk. Boston Scientific has developed data analytic capabilities to map third party manufacturers throughout our supply chain to further assess the risk of modern slavery. In 2023, we expanded our use of artificial intelligence to assess risks throughout our value chain.

5 Consultation and approvals

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

This statement was approved by the Board of Directors of Boston Scientific Pty Ltd on 19 June 2024.

Signed for and on behalf of Boston Scientific Pty Ltd

Director

Michael Baulch

Signature: 

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