

MODERN SLAVERY STATEMENT



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1 REPORTING ENTITY

This Modern Slavery Statement is submitted by Medacta Australia Pty Ltd ABN 60 115 307 563 of Unit A1, 16 Mars Road, Lane Cove, NSW 2066, in compliance with the Modern Slavery Act 2018 (Cth). It outlines the measures taken by Medacta Australia to assess and address the risks of modern slavery within its operations and supply chains during the reporting period 1 January 2024 to 31 December 2024. Medacta Australia is a wholly owned Australian subsidiary of Medacta Group SA (Medacta) and the reporting entity under the Act.

2 STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

2.1 MEDACTA AUSTRALIA

Medacta Australia specialises in the distribution of medical devices within Australia. Medacta Australia operates offices and logistics centres in Sydney, Melbourne, Hobart, Gold Coast, Perth, and Adelaide, providing operational, logistical, and customer support to healthcare providers across the country. The subsidiary employs over 130 people, with the majority engaged in permanent positions.

Our core activities in Australia include the sale, loan, consignment, and servicing of cutting-edge medical devices designed and manufactured by Medacta Group's global operations. These devices are deployed in hospitals and medical facilities for a range of applications, from surgical trials to patient care solutions. Medacta Australia does not operate manufacturing facilities in Australia, relying instead on a robust supply chain managed in collaboration with our parent company.

2.2 MEDACTA GROUP SA

Medacta Group SA, headquartered in Castel San Pietro, Switzerland, is a global leader in medical technology, specialising in the design, production, and distribution of innovative orthopaedic and spinal implants, as well as surgical instruments. The company operates in over 68 countries, employing approximately 2,000 individuals worldwide.

Medacta Group's primary manufacturing facilities and are located in Castel San Pietro and Rancate, Switzerland. The company's commitment to responsible and sustainable innovation is evident in its Corporate Responsibility Framework. It focuses on human rights, modern slavery prevention, supply chain accountability, and healthcare sustainability. Medacta Group operates within the general framework of the Universal Declaration of Human Rights of the United Nations and the fundamental Conventions of the International Labour Organisation (ILO). These principles are integrated across all subsidiaries, including Medacta Australia, to align with global policies and practices.

Medacta Group's dedication to addressing modern slavery risks is reflected in its supply chain initiatives, which include due diligence measures, supplier engagement, and compliance monitoring to mitigate potential exploitation. This commitment is supported by efforts to enhance transparency and accountability in global operations.

3 GOVERNANCE, POLICIES AND COMMITMENTS

3.1 ETHICAL EXPECTATIONS

Medacta Australia is committed to promoting lawful and ethical behaviour across its operations and supply chains. The organisation expects employees, contractors, and business partners to uphold ethical principles, including:

- Prohibiting forced labour, human trafficking, and child labour.
- Preventing discrimination and harassment in any form.
- Maintaining safe and healthy working conditions.

Suppliers and partners are expected to follow these principles as a condition of doing business with us. Compliance is supported through due diligence processes, which may include risk assessments and performance evaluations to address risks such as modern slavery. Medacta Australia's commitment to human rights emphasises the importance of fair treatment, safe working environments, and compliance with applicable labour laws. By promoting awareness through internal initiatives, our employees understand their roles in reducing risks associated with human rights violations, including modern slavery.

3.2 GOVERNANCE FRAMEWORK

Medacta Australia governance framework ensures that ethical principles are embedded across our operations. This includes respect for human rights and the prevention of modern slavery. The Board of Directors oversees sustainability and compliance efforts to align with Medacta Group's ethical standards. The principles outlined in Medacta's Code of Business Conduct and Ethics require all employees, contractors, and business partners to uphold lawful and responsible practices. These principles strengthen our commitment to modern slavery prevention, ensuring that all business activities are conducted with integrity and in compliance with applicable laws.

3.3 CODE OF CONDUCT

The Medacta Australia Code of Conduct establishes clear expectations for all employees to act with integrity, professionalism, and in alignment with the company's values. It sets out requirements covering workplace health and safety, anti-bullying and harassment, confidentiality, conflict of interest, ethical behaviour, and strict compliance with anti-bribery and anti-corruption laws. The Code mandates adherence to all applicable laws and internal policies, including those related to consumer protection, trade practices, environmental protection, and corporate regulation. It reinforces that breaches will be investigated and may result in disciplinary action, up to termination. By requiring all employees to sign and acknowledge the Code, Medacta Australia ensures a shared commitment to maintaining a safe, lawful, and ethical workplace, supported by robust governance, accountability, and continuous compliance monitoring.

3.4 HUMAN RIGHTS

Basic human rights aspects have been consistently covered as part of our Code of Business Conduct and Ethics training, which is mandatory for all our employees worldwide. As stated in our Code of Business Conduct and Ethics, “the supreme value of the human being is recognised by Medacta Group, which is committed not only to guaranteeing but also to developing his or her inviolable rights. We operate within the general framework of the Universal Declaration of Human Rights of the United Nations and the fundamental Conventions of the International Labour Organisation (ILO)”. To promote greater awareness of the main issues related to human rights covered in the Code of Business Conduct and Ethics, we annually carry out online training for all Group employees.

3.5 ANTI-CORRUPTION

We maintain business integrity as a fundamental value and considers corruption a serious threat to the development of economic and social stability. Our approach is “zero tolerance” towards all forms of corruption in our relations with both public and private entities. This implies that all actions, operations, negotiations, and behaviours associated with business practices must be based on the utmost fairness, exclude any corruption, and ensure transparency of information, with respect given to all applicable anticorruption laws and regulations of the countries in which Medacta Group operates. In 2024, there were no identified cases of corruption or violation of our code of business conduct and ethics. The main rules of conduct for the purposes of preventing corruption are contained in our Code of Business Conduct and Ethics.

4 SUPPLY CHAIN DUE DILIGENCE AND RISK MITIGATION

Medacta Australia’s supply chain is built on a foundation of ethical sourcing and compliance with global standards. The company sources medical devices, components, and related services from suppliers approved under Medacta Group procurement and compliance processes. These suppliers include both direct and indirect partners:

- Direct suppliers provide components, materials, and goods that directly contribute to the production and distribution of Medacta products.
- Indirect suppliers provide goods and services that support operations, such as facilities management, transportation, professional services, and accommodation.

ESG considerations, including human rights, labour standards, and environmental performance, are considered in supplier selection and review. This approach is intended to align procurement decisions with our ethical principles and modern slavery prevention commitments.

4.1 DUE DILIGENCE PROCESSES

Supplier due diligence is a central part of our approach to modern slavery risk management. Before engagement, suppliers undergo a review process to assess compliance with ethical, legal, and quality requirements. This may include:

- Evaluating human rights and labour practices, with heightened scrutiny for suppliers in high-risk regions or industries.
- Reviewing policies, procedures, and certifications relevant to workplace safety, anti-bribery, and modern slavery compliance.
- Assessing environmental and social performance against Medacta Group standards.

Where risks are identified, additional information or corrective measures may be required before approval.

4.2 ONGOING SUPPLIER ENGAGEMENT AND MONITORING

Medacta Group maintains regular engagement with key suppliers to ensure ongoing alignment with ethical standards. This may involve:

- Periodic reviews of supplier compliance with contractual obligations relating to labour practices and human rights.
- Incorporating ethical performance into supplier performance evaluations.
- Site visits, where feasible, to verify working conditions and operational practices.

By keeping open communication channels, we encourage transparency and early identification of potential risks.

4.3 RISK MITIGATION STRATEGIES

Where suppliers are found to be at risk of non-compliance with modern slavery laws or Medacta Group's ethical policies, the company may:

- Require corrective action plans with clear timelines and follow-up reviews.
- Provide guidance or resources to assist suppliers in improving practices.
- Suspend or terminate relationships where serious or unresolved breaches occur.

4.4 INTEGRATION WITH GROUP STANDARDS

Medacta Australia's supply chain due diligence is aligned with Medacta Group's global approach, which incorporates the principles of the Universal Declaration of Human Rights and International Labour Organisation Conventions. This integration ensures consistent standards across all markets while allowing for regional considerations.

5 ASSESSING AND ADDRESSING OUR RISKS

We recognise that certain industries and materials in its supply chain are associated with elevated risks of modern slavery. Our approach to addressing these risks is rooted in a commitment to ethical practices, transparency, and continuous improvement.

5.1 KEY RISKS IDENTIFIED

Manufacturing Risks: Modern slavery risks are often linked to working conditions in manufacturing facilities, particularly where raw materials or components are sourced from high-risk regions.

Material-Specific Risks: External studies and industry research highlight that materials such as metals, plastics, electronics, and textiles are often associated with elevated risks of modern slavery. These risks arise from the extended and often opaque nature of their supply chains, where oversight can be challenging.

Geographic Risks: Certain regions are identified as higher risk due to weaker labour protections, prevalence of informal labour markets, or lack of enforcement mechanisms.

5.2 INTEGRATION WITH RISK MANAGEMENT

The issues identified are incorporated into our risk management framework, helping to ensure that modern slavery risks are assessed and addressed across the organisation. This approach allows us to prioritise high-risk areas and allocate resources effectively to mitigate potential impacts.

5.3 TRAINING, AWARENESS, AND CONTINUOUS IMPROVEMENT

At Medacta Australia, training and education are integral to fostering a culture of ethical business practices and addressing modern slavery risks. Our programmes equip employees with the knowledge and tools to understand human rights, legal compliance, and their role in mitigating risks within the workplace and supply chains. These initiatives underscore our commitment to upholding human rights and ethical standards at all levels of the organisation.

5.4 LOCALISED CONTEXT IN TRAINING

While Medacta Group's training programmes are global in scope, they are tailored to ensure relevance across various regions, including Australia. This localised approach ensures that employees are prepared to address region-specific challenges in their roles, including those that may relate to modern slavery risks. Training content is aligned with local legal and operational requirements, ensuring compliance and effectiveness in diverse contexts.

5.5 CONTINUOUS IMPROVEMENT

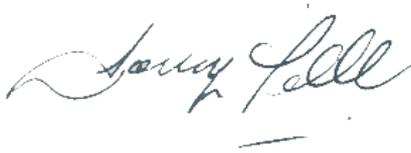
Medacta Australia is committed to continuous improvement in its training and awareness initiatives. We regularly review and update our training programmes to reflect emerging risks, regulatory changes, and industry best practices. By integrating lessons learned and adapting content, we ensure that our workforce remains informed and prepared to address human rights challenges, including those related to modern slavery.

6 CONSULTATION

In preparing this statement, Medacta Australia engaged with key stakeholders across its Australian offices, including teams from Human Resources, Finance, Sales, and Operations. These consultations provided valuable insights into operational practices and supply chain processes, supporting the organisation's approach to addressing modern slavery risks. In addition, Medacta Australia consults with Medacta Group SA to align modern slavery prevention efforts, including risk assessments and supplier engagement strategies.

7 APPROVAL

This Modern Slavery Statement has been approved by the Board of Directors of Medacta Australia Pty Ltd, on 20 October 2025.

A handwritten signature in black ink, appearing to read 'Tony Pelle', with a horizontal line underneath.

Tony Pelle

Managing Director

Medacta Australia Pty Ltd