

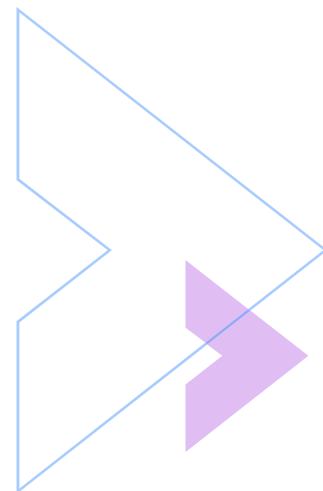
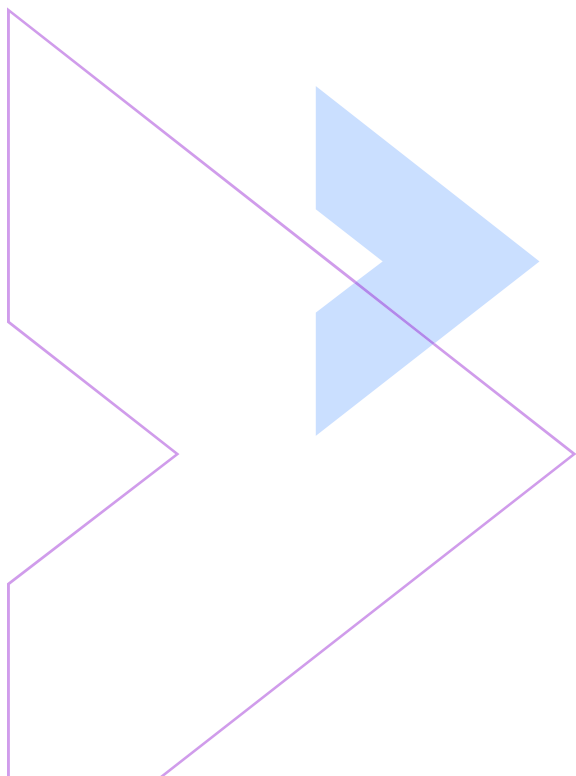


**Boston
Scientific**
Advancing science for life™



Modern Slavery Statement

For the Year Ended December 31, 2024



Introduction and reporting entities

In this statement, “Boston Scientific” refers to Boston Scientific Corporation and its subsidiaries.

This statement is provided to comply with reporting requirements under:

- the Australian Modern Slavery Act 2018 (“Australian Modern Slavery Act”);
- the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 (“Canadian Modern Slavery Act”); and
- the United Kingdom’s Modern Slavery Act 2015 (“UK Modern Slavery Act”).

With United Kingdom, Australia and Canada being the jurisdictions relevant to this statement, together the “Reporting Countries.”

This statement is provided by Boston Scientific Corporation to comply with the reporting requirements of the following reporting entities:

- Boston Scientific Limited and British Technology Group Limited (as UK entities reporting under the UK Modern Slavery Act);
- Boston Scientific Pty Ltd (Australian entity reporting under the Australian Modern Slavery Act); and
- Boston Scientific Limited and Baylis Medical Company Inc. (as Canadian entities reporting under the Canadian Modern Slavery Act).

This statement relates to the reporting period of 1 January 2024–31 December 2024.

We have prepared this statement as a joint statement of the actions taken by Boston Scientific to address modern slavery risk as Boston Scientific globally operates across the same sector and product lines, manufactures, and distributes products from Boston Scientific owned and operated manufacturing facilities and operates under similar policies, procedures and risk mitigation measures across all relevant geographies.

This statement has been prepared in consultation with our supply chain, compliance, global business resiliency, and environmental, social and governance (ESG) teams.

1. Our structure, operations and supply chain

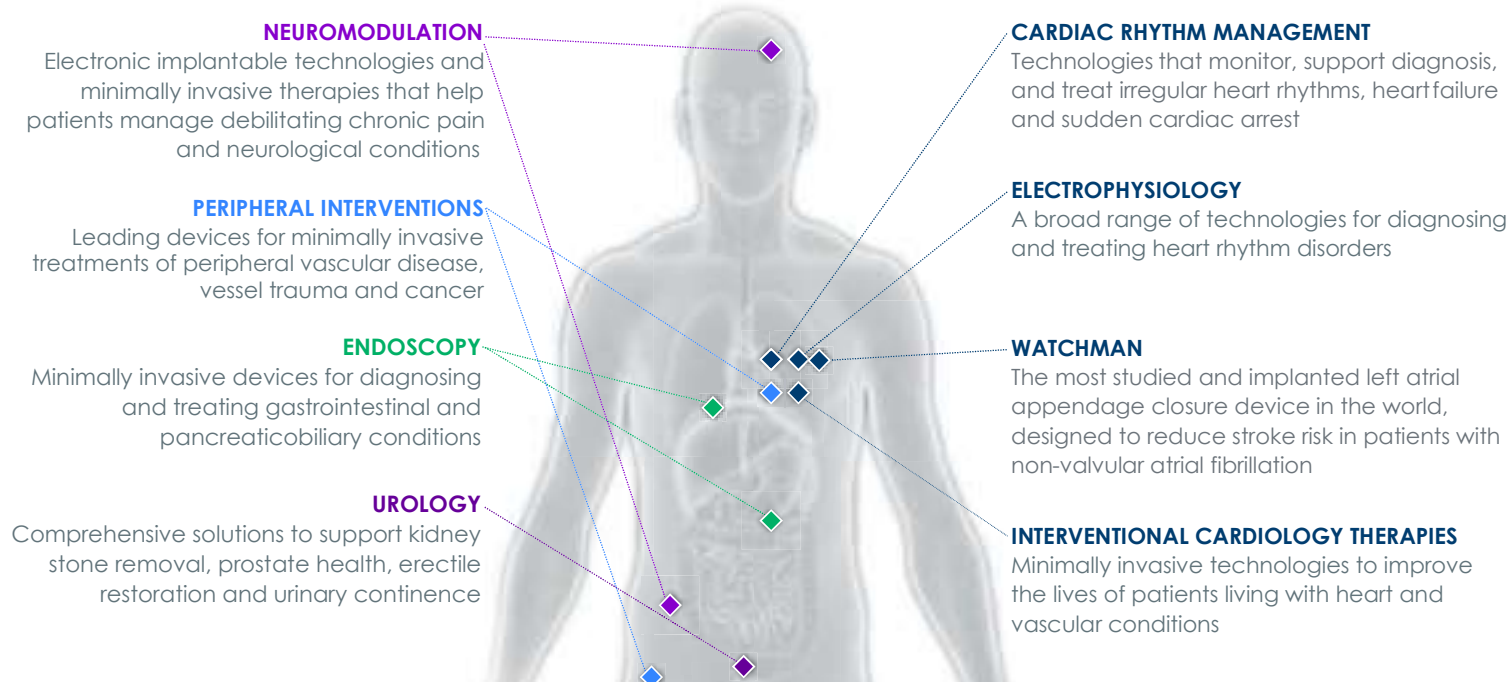
Boston Scientific is dedicated to transforming lives through innovative medical solutions that improve the health of patients around the world. We are a global developer, manufacturer and marketer of medical devices that are used in a broad range of interventional medical specialties.

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 categorized as low/low-medium risk by Global Slavery Index.²

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 2024, our products were offered for sale by five core segments, Neuromodulation, Peripheral Intervention, Endoscopy, Urology, and Cardiology (composed on four respective business units as shown below).

Whilst the Boston Scientific product portfolio is broad in scope, Boston Scientific does not import into the Reporting Countries any of the top ten high-risk products for modern slavery and human trafficking for use in our final products.³



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.

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

1.1 Operations and people



1.2 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 or other designated committees 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. The Global Compliance team continues to focus on and implement enhanced program metrics to measure its effectiveness and has invested in resources to capitalize on data analytics in this effort.

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 ask a question, obtain guidance, and/or report a concern related to compliance, ethics and/or integrity at Boston Scientific. It is operated by a third-party vendor, and reports may be made anonymously except where local law restricts, 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 policy" to ensure employees feel comfortable raising questions and concerns. In 2024, 73% of concerns reported were made directly by an employee to a resource designated in the Code of Conduct (e.g., Compliance, Human Resources, 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.

In each of the Reporting Countries there are employment laws which Boston Scientific adheres to, whether through direct employment or via agencies that provide contractors, and we ensure due diligence on each employee is performed to mitigate risks of modern slavery in our direct workforce.

1.3 Our supply chain

Direct sourcing:

Boston Scientific distributes products sourced from manufacturing and distribution facilities owned and operated by Boston Scientific around the world.

During 2024, the majority of products distributed in the Reporting Countries as finished products were manufactured and/or distributed by Boston Scientific facilities located in the United States of America, the Netherlands, Ireland, Costa Rica and Malaysia.

Boston Scientific's direct supply chain is primarily related to the following operations:

- Product manufacturing
- Product distribution
- Other activities to support the above.

Indirect sourcing and support functions:

Boston Scientific entities also procure/consume a number of goods and services for use in its everyday local operations. These goods and services include logistics, transportation, warehousing, telecommunications and IT services, professional services, travel and accommodation, facilities management and cleaning, among others.

2. Our risks

To assess modern slavery risks, Boston Scientific carries out monitoring and consults with external third parties as part of its supply chain resilience. As outlined below, we have assessed the risks of modern slavery and human trafficking for Boston Scientific'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 globally is low due to Boston Scientific's global policies as well as employment laws in each of the Reporting Countries. While the global nature of Boston Scientific's operations inherently brings higher risks, we consider the risk of modern slavery to be low due to the local and global controls currently in place.

Direct Supply Chain

As Boston Scientific controls and operates manufacturing and distribution centres and taking into account the geographical locations of the facilities that supply to the Reporting Countries (predominantly United States of America, the Netherlands, Ireland, Costa Rica and Malaysia) we consider the risk of modern slavery in our direct sourcing activities to be low.

Indirect sourcing

As indirect sourcing activities occur in each of the Reporting Countries, 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. We recognize activities such as corporate cleaning and maintenance of office buildings, which are typically carried out by third parties via arrangements with property owners, are sectors with known modern slavery risks, and we are actively monitoring and evaluating these activities.

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. We also offer 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

Boston Scientific has responsible sourcing and supplier selection, and management processes in place 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 may include 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 supplier agreements, quality agreements and/or purchase order terms and conditions. These agreements require compliance 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 our suppliers understand what is required to meet Boston Scientific's quality standards.

We have a Supplier Resiliency and Risk program in place which uses internal systems as well as a third-party platform to monitor risks. The system leverages publicly available information to alert us to potential supply issues, 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 we continue to expand our training program.

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 actively engage with external stakeholders, including industry groups, supply chain partners and customers, to benchmark our program's practice and identify ways to improve effectiveness. 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, and strive 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

Representatives of each of the Reporting Countries were consulted and engaged in the development of this statement.

This statement has been approved by the Board of Directors of Boston Scientific Corporation on 7 May 2025.

Michael Mahoney

Chairman and CEO

Boston Scientific Corporation

Emily Collins

Director of all the above-listed UK entities

Kenneth J. Spears

Vice President & Country Director, Canada

Troy Burke

Vice President & Managing Director, Australia and New Zealand

Troy Burke

[Troy Burke \(May 29, 2025 14:02 GMT+10\)](#)