Docusign Envelope ID: 018AEC13-CBE5-433D-A544-39C991FF483C

# Modern Slavery Statement

## Introduction

At HeartFlow, we recognize the profound impact that slavery, in all its forms, has had throughout history and continues to have in various parts of the world today. We acknowledge the deep and lasting harm caused by the transatlantic slave trade, forced labor, and other systems of exploitation that have deprived millions of people of their fundamental rights, dignity, and freedom.

We are committed to understanding, addressing, and taking responsibility for any historical connections our organization may have had with slavery, whether directly or indirectly. It is our moral obligation to confront this legacy, promote education about slavery's ongoing effects, and contribute to the fight against modern forms of slavery, including human trafficking, forced labor, and exploitation.

In line with this commitment, we strive to uphold the following principles:

- **Acknowledgment of History**: We will work to fully understand and address the historical links between our institution and the practice of slavery, ensuring transparency in acknowledging past injustices.
- **Education and Advocacy**: We are dedicated to educating our community, staff, and stakeholders about the lasting consequences of slavery, including racial inequalities and socio-economic disparities. Through awareness and dialogue, we aim to foster a deeper understanding and inspire action.
- **Equity and Inclusion**: We pledge to actively promote diversity, equity, and inclusion within our institution and across our work. We are committed to removing barriers caused by racial and social inequalities rooted in slavery's legacy.
- **Support for Anti-Slavery Efforts**: We are committed to supporting efforts to end modern slavery, human trafficking, and exploitation globally. We will work with partner organizations, advocate for stronger laws and policies, and support initiatives that help victims and survivors of such practices.

This statement is not just a reflection on the past but a commitment to a more just and equitable future. We believe by addressing the legacy of slavery, we can contribute to building a society where freedom, justice, and dignity are truly available to all.

## Background

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. Heartflow have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective

Docusign Envelope ID: 018AEC13-CBE5-433D-A544-39C991FF483C

systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

## Statement

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

## Organisational Information

HeartFlow is a medical technology company revolutionizing precision heart care globally. HeartFlow's non-invasive personalized cardiac test provides unprecedented visualization of each patient's coronary arteries, enabling physicians to create more effective treatment plans for their patients.

## Our Supply Chain and Procurement

Heartflow is committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to carry out third party due diligence.

This includes:

- Robust supplier selection and policies – all suppliers are submitted to the Procurement Committee for evaluation and approval following completion of a supplier evaluation request form.
- Supplier questionnaire, audit and periodic reviews by the Procurement Committee in accordance with our company Supplier Management Procedure
- Suppliers in the US handling patient data are required to sign a business associate agreement, as applicable.

Docusign Envelope ID: 018AEC13-CBE5-433D-A544-39C991FF483C

- Mapping of the supply chain to identify geographical areas of higher risk

- We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices. Such as:
    - Aggressive pricing that doesn't consider sustainable production costs
    - Short lead times and late high-volume orders
    - Inaccurate forecasting
    - Late of extended payments
    - Withdrawing from contract at the last minute
    - Enforcing unfair penalties for not meeting orders
    - Making last minute changes to order specifications or volumes
    - Providing inaccurate specifications

Process improvements currently in process include:
- Requiring high risk suppliers, as part of the contract, to adhere to modern slavery policies and principles
- We will require our suppliers, as part of the selection process and yearly auditing, to confirm adherence to our Ethical Trading, Human Rights and Labour Standards Policies.
- Auditing of our suppliers, starting with high risk, using supplier self-assessment questionnaires

## Areas of risk identified within the business and supply chain

Our suppliers are risk assessed in terms of Quality, Information Security, and Privacy

Heartflow has an approved supplier list of around 190 suppliers.
A desktop audit of these suppliers is conducted annually using the following methodology:

**Supplier risk assessment:**
- The risk level is determined using the scale according to the global slavery index. Https://www.globalslaveryindex.org
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. Https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods · Then the sector is checked against the ILO's Global Estimates of Modern Slavery.

**Findings:**
- **15** suppliers identified as medium risk – due to either supplier providing recruitment and staffing services, where the risk of Modern Slavery increases or to geographical location.
- **0** suppliers identified as high risk

**Tier 1**
The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as overall low.

7.7% of our overall supplier list fall into medium risk categories.

Further audit and due diligence is planned in the next financial year with the medium and high risk suppliers the first priority.

Docusign Envelope ID: 018AEC13-CBE5-433D-A544-39C991FF483C

This risk level will be reviewed yearly and reported on.

**Tier 2**
We have not mapped our supply chain in tier 2 at this time. This is an area of improvement that is under management and the Procurement Committee's review.

## Policies and Processes relating to Modern Slavery

- Supplier Management Procedure
- Supplier Corrective Action Request
- Supplier Evaluation Form
- Purchasing Procedure
- Business Associate Agreement
- Data Protection Agreements

**KPIs**

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains moving forward in 2025.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

1. a. The number of modern slavery cases identified and remediated
   b. Update of the Modern Slavery Statement and completion of the MSAT yearly
2. Number of medium or high-risk suppliers completing a supplier self-assessment audit with the inclusion of modern slavery questions
3. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

## Training of employees around Modern Slavery

We recognise that training on Modern Slavery is essential within the organisation, so we plan to implement training which will be delivered through HeartFlow's Learning Management System and this will be mandatory for our employees.

Docusign Envelope ID: 018AEC13-CBE5-433D-A544-39C991FF483C

## Reporting

If a case of Modern Slavery is suspected, then the following is advised. A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If there is an immediate risk to life, then call a local emergency number (e.g. 911 in the US, 112 in Europe, 999 in the UK).

If there is no immediate risk to life, then contact the national helpline or report it online.

Helpline and On-line Reporting

| Country | Helpline | Phone | On-line |
|---|---|---|---|
| EU | Anti-trafficking hotline | See https://www.europeanfreedomnetwork.org/hotline/ | |
| UK | Modern Slavery Helpline | 08000 232 700 | https://www.modernslaveryhelpline.org/report |
| US | National Human Trafficking Hotline | 1-888-373-7888 | https://humantraffickinghotline.org/en/report-trafficking |

Employees are required to take their suspicions to their direct manager.

If there are concerns around modern slavery with any of our suppliers we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organization.

If the response from any of our suppliers, here in the UK or abroad, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected abroad, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remembering the economic influence and control which the organisation holds over those who may be committing these crimes.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions would then be included in the next statement produced.

Docusign Envelope ID: 018AEC13-CBE5-433D-A544-39C991FF483C

## Breaches

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

## Responsibility

HeartFlow staff with responsibility for this statement:

Chief Legal and Compliance Officer
Chief Human Resource Officer
Senior VP, International Sales, Marketing, and Customer Success
VP, Finance/Procurement

## Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website, and also uploaded to the following register: https://modern-slavery-statement-registry.service.gov.uk

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

## Board / Senior Management Approval

SIGNED: DocuSigned by: Francesco Jatta D6BA4D847CEC4BB...

NAME: Francesco Jatta

JOB TITLE: VP Sales & Marketing EMEA

DATE: 12/10/2024 | 3:52 AM PST