Modern Slavery Statement

This statement discusses the activities of Natus Medical Incorporated and its subsidiaries (collectively, "Natus" or the "Natus group") to address forced labor, human trafficking and slavery (collectively, "modern slavery") in our business and supply chains. This statement is published pursuant to both the California Transparency in Supply Chains Act and the UK Modern Slavery Act 2015.

This statement describes the compliance activities and planned improvements of the Natus group taken as a whole, since we maintain the same modern slavery compliance measures across our business. However, only some of the entities that are part of the Natus group are subject to the California Transparency in Supply Chains Act and/or the UK Modern Slavery Act 2015.

Natus is committed to respecting the human rights of all individuals, and as such will not tolerate modern slavery in our business or supply chains. We comply with all local, state, federal, and international laws with respect to labor laws, human rights, and human trafficking.

Given the nature of our products, a significant percentage of our vendors are larger companies, including well-known large contract manufacturers. Manufacturing in the medical device industry generally takes place in a highly regulated environment. We believe that this mitigates the risk of modern slavery in the manufacture of our products at many of our vendors. In addition, we have long-standing relationships with a significant number of our larger vendors, which over time provides additional insight into their business practices and approach to compliance.

Our standard form Purchase Order terms and conditions require suppliers to warrant that all goods delivered will be in compliance with all applicable laws and regulations, which would include those relating to modern slavery. At present, Natus does not perform dedicated audits of suppliers to evaluate compliance with company standards for modern slavery in its supply chain, but should circumstances warrant it, Natus may implement such audits in the future.

Natus strives to maintain a safe and ethical working environment and our policies reflect this commitment. Our Employee Manual applies to Natus employees worldwide and provides guidance to employees to prevent misconduct in the workplace. It requires employees to comply with all applicable laws, which would include laws relating to modern slavery. The Natus group will not retaliate against employees who report suspected modern slavery in the supply chain.

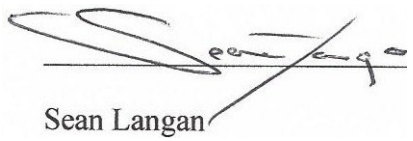
Natus has also adopted a Code of Conduct (the "Code") that applies to employees worldwide. Among other things, the Code specifies that employees are expected to act ethically and in compliance with all applicable laws. The Code encourages employees to raise ethical questions or concerns. Employees are provided with various channels to do so, including by phone and the internet. Employees are required to acknowledge the Employee Manual and Code on an annual basis.

Our standard form purchase order terms and conditions require suppliers to warrant that all goods and services delivered will be in compliance with all applicable laws and regulations, which would include those relating to modern slavery. Last, our standard form contract manufacturing agreement permits us to inspect the supplier's facility for noncompliance.

Natus maintains third party administered mechanisms for reporting unethical or illegal conduct. Violations can be reported by telephone message to Natus' external, confidential Hotline at (844) 319-1609 or through a web-based form located at natus.ethicspoint.com. These mechanisms are publicly disclosed on Natus' website.

Natus recognizes the risk of modern slavery in supply chains. Although we have limited influence over our suppliers, we are committed to further developing our accountability standards and procedures specifically to address our supplier's compliance with the California Transparency in Supply Chains Act and UK Modern Slavery Act 2015, as well as an action plan to ensure that our employees and management, particularly those who have direct responsibility for supply chain management, receive training on human trafficking and slavery.

Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the Board of Directors of Optima Medical Limited and is signed by a Director of that entity.



Sean Langan