DISCLOSURE STATEMENT UNDER THE UK MODERN SLAVERY ACT 2015

Introduction

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

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.

Statement

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

HistoSonics, Inc. is a medical device company with a mission to advance the novel science of histotripsy and its powerful benefits, bringing meaningful and transformational change to physicians and their patients. Our passion is to deliver solutions to patients with some of the most significant diseases, without the use of knives or needles, and without the side effects of many of the common surgical and interventional procedures that exist today.

The Head office is in Plymouth, MN USA and we conduct our business and sell our product Worldwide. We are a Medium Enterprise, as defined by the UK Companies Act 2006.

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Our Supply Chain and Procurement

We have over 290 suppliers on our Approved Supplier List (ASL) 91% of whom are based in the USA. The remaining suppliers are based in Belgium, Canada, China, Denmark, Estonia, France, Germany, Ireland, Netherlands, Philippines, Serbia, Singapore, Spain, Sweden, UAE, and UK.

All potential suppliers go through a qualification process as part of our quality management system requirements before being added to the ASL, which includes:

- Supplier questionnaire that includes a section requesting supplier to list all sites at which manufacturing of the products we procure may be performed
- Change notification agreements in which suppliers ensure they will notify us if these change
- Contract requirement with high-risk suppliers, which includes adherence to modern slavery policies and principles

HistoSonics, Inc. 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. We are supporting this commitment by partnering with GreenSoft Technology, Inc. to actively assess our supply chain, and conduct risk analyses.

Areas of risk identified within the business and supply chain

We have conducted a risk assessment on our approved supplier list as detailed below.

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

Assessment Criteria:

0 or 1 Risk factors – Low Risk
2 Risk factors – Medium Risk
3 Risk factors – High Risk

Findings:

Risk Statistic	Number of Suppliers	Percentage of Approved Supplier List
High Risk	1*	0.34%
Prevalence Risk Rating > 50%	2	0.68%
Provide "High-Risk" Goods	3	1.03%
Perform manufacturing in China	3	1.03%
Medium Risk	4	1.37%
Vulnerability rating ≥ 40%	5	1.71%
Vulnerability rating > 33%	7	2.40%
Non-USA Suppliers in Manufacturing Sector	11	3.77%

*This supplier has published their own statement linked here: Slavery and Human Trafficking Statement.

Tier 1

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as Low, as 98% of our suppliers are categorised as low risk.

Tier 2

We have not currently mapped our supply chain further than Tier 1

Policies and Processes relating to Modern Slavery

Our approach to Modern Slavery and the identification and mitigation of it within our supply chain is supported by the following policies:

- Ethical Trading, Human Rights and Labour Standards Policy
- Employee Handbook - This outlines the commitment and expectation of all employees to lawful and ethical behaviour in all activities; domestically and internationally
- QSM1000 - Quality Manual
- QSP1015 - Supplier Qualification and Management

Reporting

As detailed in our Employee Handbook,

> *Every employee is required as a condition of continued employment to report any known or suspected violation of any applicable law, regulation, or Company policy, or raise an ethical concern or question to his or her immediate manager, Human Resources, the Compliance Officer or the Chief Financial Officer.*
> *Failure to meet or comply with these expectations will result in discipline up to and including termination.*

No employee will be subjected to retaliation, intimidation, or disciplinary action as a result of reporting a potential violation of the law, compliance program, or company policy, even if the report is found to be inaccurate.

Additional Guidance

If a case of Modern Slavery is suspected, the following is advised. A suspected victim of modern slavery is not to be confronted directly as this may endanger them. If an immediate risk to life, then call local emergency (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.

Helplines 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

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 organisation.

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.

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

The following have responsibility for this statement:

- VP of Global Market Access
- Compliance Officer
- VP of Operations

Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website, and uploaded to the following register:

- https://modern-slavery-statement-registry.service.gov.uk

Board / Senior Management Approval

SIGNED: 

NAME: Eric Clyse

JOB TITLE: Vice President - Operations

DATE: June 25, 2025