

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by B. Braun Medical Limited, its subsidiaries and B. Braun Avitum UK Limited, in compliance with Section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 January 2023 to 31 December 2023.

B. Braun Medical Limited ("B. Braun") is part of the B. Braun group of companies which is one of the world's leading healthcare groups. B. Braun Melsungen SE ("B. Braun SE") is the ultimate parent company of B. Braun. With over 63,000 employees in more than 64 countries, the B. Braun group develops high quality healthcare products, systems and services for users around the world. B. Braun (UK) had an annual turnover of £283,495,000 for the financial year ending 31 December 2023 and employs circa 1339 people (FTEs) in the UK. To find out more about what we do and our values, please go to our Company page.

B. Braun Avitum UK Limited ("B. Braun Avitum") trades in the UK and shares the same ultimate parent company as B. Braun, being B. Braun SE. B. Braun Avitum is managed and administered as part of the UK group of B. Braun companies. B. Braun Sterilog Limited is a wholly owned subsidiary of B. Braun. B. Braun Sterilog (Birmingham) Limited and B. Braun Sterilog (Yorkshire) Limited are wholly owned subsidiaries and trading companies of B. Braun Sterilog Limited.

The B. Braun Group currently operates in most countries across the world as follows:

- United Kingdom (manufacturing of aseptic products, distribution and sales of healthcare products and services).
- Germany (head office, manufacturing, distribution and sales of healthcare products and services).
- Manufacturing and/or production sites in China, Malaysia, Poland, Hungary, Italy, India, South Africa, USA, Mexico, Brazil, Switzerland, Ireland, Japan, Romania, Russia, Vietnam, Philippines, Australia, Chile, Colombia, France, Netherlands, Peru and Finland.

INITIATIVES

B. Braun SE have published the Group Human Rights Declaration which sets out the commitment to uphold and promote human rights in the course of its business activities. The declaration is a binding framework of conditions for world-wide activities and applies to all B. Braun Group companies, and its supply chain.

B. Braun SE have prepared the Group Environmental, Social and Governance (ESG) Standards for Suppliers which is based on the internationally recognised standards including the Universal Declaration of Human Rights and the ILO (International Labor Organization) Core Labor Standards. It applies to all business relations between the B. Braun worldwide Group and its Suppliers. In addition, B. Braun expects our suppliers to respect human rights, ethics, and environmental standards to their upstream supply chain.

B. Braun SE have initiated an evaluation of suppliers, by way of survey, through the external service provider IntegrityNext. This survey includes a wide range of questions encompassing the topics of environmental, sustainability, employment practices and procurement.

Our ESG Standard for Suppliers is an essential part of our supplier contracts and requires suppliers to meet the Standards. It makes it clear to our suppliers that we only want to buy products and services from responsible third parties. These requirements are monitored through performance controls such as supplier evaluations and audits. Integrated software solutions for supplier qualification and monitoring help us achieve increased transparency across our supply chains. We obtain relevant information on the sustainability efforts of our suppliers and take

specific actions when needed. We also conduct annual reviews where we can address compliance with our required Standards.

B. Braun's goal is to use a comprehensive risk management system to help identify, document, evaluate and minimize actual and potential risks that may arise in our business operations and in global supply chains early on. As a result, we implemented a supplier risk management process across our entire purchasing portfolio, which is ongoing until the end of 2024. Supplier risk is determined using real-time data from an independent service provider, which allows us to continuously monitor and control risks in our own supply chain.

OUR SUPPLY CHAIN

B. Braun distributes products in the UK mainly via B. Braun SE's distribution site which is located in Germany. Products are shipped both to B. Braun's distribution centre or partners in the UK and also directly to B. Braun's customers.

B. Braun also distributes products manufactured by other companies, for example, implants for upper limbs, for which there are distribution agreements in place.

B. Braun currently sells in excess of 37,000 products including the following categories:

- Surgical Instruments
- Power Tools
- Orthopaedic Implants
- Infusion Pumps
- Continence and Stoma Care Products
- Cannulation Products
- Medicines
- Nutritional Products
- Endoscopic Instruments
- Closure Products
- Hygiene Products
- Diabetes Products
- Urology, Bowel and Faecal Management Products
- Procedure Packs
- Vetcare Products
- Dialysis Machines and Consumables (Avitum)

OUR SUPPLIERS: DUE DILIGENCE PROCESSES

B. Braun understands the challenge of ensuring high social, ethical and environmental standards within its business and throughout its supply chain. As a result, B. Braun is committed to working collaboratively with its suppliers to ensure that these standards are continually improving.

In order to achieve this, B. Braun has developed an Ethical Trading Policy drawing on the internationally acknowledged ETI base code.

This Policy defines B. Braun's minimum standards and the basic principles we expect from all our suppliers and contractors. B. Braun is committed to ensuring that the standards outlined in the policy are effectively implemented, measured and monitored throughout our global supply chain and we require the support of our suppliers to achieve this goal.

Suppliers are required to complete a Vendor Questionnaire which includes the requirement that they agree to comply with B. Braun's Ethical Trading Policy, Modern Slavery and Human Trafficking Policy and Supplier Code of Conduct, prior to undertaking any trade with them.

During the course of 2023 B. Braun have continued to directly contact suppliers to confirm their annual turnover and, if applicable (over £36 million), we requested a copy of their Modern Slavery Act Transparency Statement.

RESPONSIBILITY

Responsibility for B. Braun's anti-slavery initiatives is led by UK Group Compliance Officer and supported by the Compliance Committee but ultimately sits with B. Braun's UK Board of Directors. The Compliance Committee is

made up of the Senior Managers for Legal, Regulatory Affairs, Health & Safety, Insurance, Environmental, Finance & Corporate Affairs, Sales and Marketing, Facilities, Human Resources and Central Purchasing.

The UK's anti-slavery initiatives are fully supported by B. Braun AG's Group Compliance Committee, where the Group Compliance Manager has been given responsibility for supporting all companies within the B. Braun Group in complying with the legislative requirements including Modern Slavery, European Labour Standards and the Labour Standards Assurance System in the UK.

B. Braun's Compliance Committee are responsible for:

- Writing the necessary Policies
- Conducting Risk Assessments
- Carrying out Investigations
- Monitoring ongoing Compliance

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

B. Braun is committed to legally compliant, ethical and socially responsible business and employment practices. B. Braun has a suite of relevant policies in this regard:

- **Modern Slavery and Human Trafficking Policy:** B. Braun has zero-tolerance to modern slavery. This policy applies to all employees, business partners and suppliers.
- **Code of Conduct:** B. Braun's Global Code of Conduct is mandatory worldwide and outlines the basis for the ethical behaviour of each of our employees. It not only requires compliance with laws and legal requirements but also embraces ethical values, such as integrity, fairness and sustainability.

Each country, in which there is a B. Braun company, completes a Self-Assessment Compliance Questionnaire to measure and monitor compliance with the Code of Conduct on an annual basis.

- **Whistle blowing policy:** B. Braun encourages all of its employees to report any concerns related to the direct activities of the business or the way in which the business is run, including breaches of the Global Code of Conduct. The organisation's whistle-blowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- **Recruitment/Agency workers:** B. Braun uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Equality and Diversity:** B. Braun is committed to being an equal opportunity employer and to ensure that all employees, contractors and job applicants are treated fairly and are not subjected to discrimination, bullying, harassment or victimisation in the workplace.

In 2023 we rolled out Diversity and Inclusion meetings/webinars, hosted by external specialists. These specialists had previously carried out internal assessments with many members of staff in varying positions to ascertain our situation and understanding of this subject. Further work with all levels of roles & responsibility will be carried out to better our D&I understanding and improve inclusion within our businesses.

- **Corporate Social Responsibility:** B. Braun is committed to minimising the impact the business has on the environment. The B. Braun Group was the first medical products manufacturer to participate in the European Community Ecology Audit. Many of B. Braun's locations conform to the European Environmental Management and Audit Scheme (EMAS III) and also hold the Environmental Management Standard ISO 14001:2015.
- **ISO 9001:2015 Accreditation:** B. Braun is committed to total quality management; customer focus, a continually improving process approach implemented throughout the organisation, critical processes

and their interactions are understood and documented, and a strong management commitment to all these facets of the ISO 9001 Quality Management System. B. Braun continually assesses compliance to ISO 9001 within the business through an internal audit process.

- **ISO 13485:2016 Accreditation:** Additional to ISO 9001, we also have certification to Medical Devices Quality Management Systems, since we also manufacture medical devices in Sheffield. Again, this management system shows B. Braun is committed to total quality management; customer focus, a continually improving process approach implemented throughout the organisation, critical processes and their interactions are understood and documented, and a strong management commitment. B. Braun continually assesses compliance to ISO 13485 within the business through an internal audit process.
- **Anti-Bribery and Corruption:** B. Braun is committed to carrying out its business fairly, honestly and openly in the UK and overseas. The organisation will not tolerate bribery of any type, at any level, or for any purpose, within the business. B. Braun will not conduct business with customers, suppliers or other third parties who do not also conduct their business in compliance with the Bribery Act 2010.
- **Health & Well-Being Strategy:** B. Braun provides a working environment that promotes the physical and mental health and wellbeing of its workforce.
- **Investors in People Champion:** Investors in People (IiP) is a prestigious accolade. It is only granted to companies that can prove their commitment to the very best practices in the development of their employees.

B. Braun is proud to have held the Investors in People Award continuously since December 2001. In 2009 we achieved the Bronze award, in 2010 we were awarded with Silver, in 2012 we were presented with Gold and our journey through the IiP ranks culminated in our Champion award in July 2013. In 2015 B. Braun Medical Ltd was reaccredited for the second time against the Investors in People standard as a gold organization along with retaining our Champion status. In October 2018 and October 2021 B. Braun Medical Ltd retained the GOLD award and our assessment reported on the exceptionally high levels of commitment with employees who have the right knowledge, skills and motivation to make an outstanding contribution towards the success of our organisation. Continuing in our journey as an IiP CHAMPION is a major accolade for our company and its employees – it demonstrates that B. Braun Medical is placed significantly above the IiP and industry average in this national quality Standard.

RISK ASSESSMENT PROCESSES

B. Braun is dependent on a large and diverse range of suppliers, who form an integral part of B. Braun's ability to provide quality products and services. The supply chain at Tier 1, Tier 2 and Tier 3 level is extremely complicated, given that B. Braun sells over 37,000 products in the UK alone.

B. Braun annually reviews part of its supply chain for the purposes of its Labour Standards Assurance System ("LSAS"), as per our 3-year rolling schedule of assessment (year 1 – Full Questionnaire/assessment, year 2 – Review, year 3 – Review). The review years do involve engagement with the supplier, who has to fully review and update any previous answers.

Desktop ethical risk assessments are carried out with Tier 1 suppliers and Tier 2 suppliers based in ethically high risk countries, based upon a Country Profile document for where that supplier operates..

In 2023 we analysed supply chains for 20 contracts and found 139 suppliers in tier 1, 2 or 3, mapping back to manufacturers of the products. This identified 3 countries that required a new Country Profile. We also reviewed over 20 existing country profiles.

Country Profiles are used to inform the person carrying out the risk assessment. Information within these profiles includes minimum wage levels, minimum working age(s), country demographics/economy, specific ethical risk areas and how many of the ten fundamental ILO (United Nations agency – International Labour Organisation)

conventions the country has ratified, enforced or denounced. From these country profiles a level of ethical risk is attributed (low/high).

This resulted in supply chains containing 12396 individual product codes. There were 23 Tier1, 113 Tier 2 and 3 Tier 3.

We risk assess all Tier1 suppliers, and for other tiers only those based in High Risk countries as concluded within Country Profiles. We use a Questionnaire based directly on the requirements of our Ethical Trading Policy.

The questionnaire also asks for company names and their location of their suppliers for these products. Answers are not just accepted. They must be supported with accompanying supplier policies or information..

CONTRACT CLAUSES

B. Braun has a modern slavery clause in our standard agreements and terms and conditions for procuring goods and services from our suppliers.

EDUCATION AND TRAINING TO RAISE AWARENESS OF MODERN SLAVERY AND HUMAN TRAFFICKING

The Compliance Committee has responsibility for ensuring that all employees are aware of B. Braun's statement of compliance with the Modern Slavery Act 2015, B. Braun's Modern Slavery Policy and its on-going commitments. The Compliance Committee shall ensure that this statement is displayed on the company intranet and B. Braun Knowledge Centre (BKC).

Training continues to be delivered to employees and management who have direct responsibility for supply chain management, particularly with respect to mitigation of modern slavery risks within the supply chain.

In 2021, B. Braun launched a new digital training platform for employees which includes the delivery of an interactive training module on the Modern Slavery Act. This training module will be refreshed and delivered to employees every 2 years. This training module sets a KPI which is measured via an in-course test, with a pass rate set at 80% and B. Braun requires a minimum of 85% of employees to have completed the training at any point in time, of the rolling training programme, to mitigate modern slavery in the organisation. In 2023 this KPI was achieved with 86% of employees having completed and passed the training module.

In addition to the above, B. Braun employees in roles that are directly involved in the selection of suppliers; Procurement, Purchasing, Tenders, Product Managers and the Labour Standards Working Group receive training on Labour Standards and Ethics which includes raising awareness of the risks of forced labour, slavery and human trafficking. This training was delivered during 2023 and is reviewed on an annual basis. B. Braun have an internal key performance indicator (KPI) for this training module that 70% of those employees selected to undertake the training must complete the training and achieve a pass score. The selected employees must repeat the training every 2 years. Those employees that do not achieve the pass score must repeat the training. The 2023 KPI set for this training was achieved for 5 of the 6 teams/department (39 out of 41 people) and not for one dept/team of 4 people. This was brought to attention of senior management through the Management Review process.

MEASURING EFFECTIVENESS

B. Braun have identified there are different existing supply chains and continue to review the policies and processes in these supply chains for compliance with the Modern Slavery Act 2015.

During the course of analysing and risk assessing the supply chain, where it is identified that corrective action is required by a supplier a Corrective and Preventive Action Plan will be issued to the supplier. B. Braun will work collaboratively with its suppliers to ensure that any CAPA is effectively implemented.

In 2020 the B. Braun Group launched the Group Strategy for the Next Decade. One of the primary tenets of the strategy is the 'Joint Commitment' which includes a Group Commitment to sustainability, on environmental, social and economic grounds and embracing diversity and inclusion on a global basis. The Group Strategy incorporates technological and digital initiatives, monitoring goal achievements, and measuring the effectiveness of the sustainability and diversity management plans.

B. Braun is also incorporating the NHS Social Value Model themes into its procurement and supply:

- Fighting climate change
- Wellbeing
- Equal Opportunity
- Tackling economic inequality
- COVID-19 recovery

BOARD APPROVAL

This statement was approved by the Board pursuant to Section 54(1) of the UK Modern Slavery Act by B. Braun Medical Limited's Board of Directors on 13th May 2024.

A handwritten signature in black ink, appearing to read 'M. Parden', written in a cursive style.

Michael Parden
Managing Director
B. Braun Medical Limited