

FY 2025 Statement on the Prevention of Slavery and Human Trafficking

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Siemens Healthineers - Great Britain & Ireland

1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”). It sets out the steps taken by the Siemens Healthineers companies operating in Great Britain and Ireland (together, “the Companies”) during the financial year, and on an ongoing basis, to prevent modern slavery, forced labour, servitude and human trafficking within our operations and supply chains.

Siemens has been active in Great Britain and Ireland for over 170 years. This statement applies to the following legal entities:

- A. Siemens Healthineers Limited – UK
- B. Siemens Healthcare Diagnostics Limited – UK
- C. Siemens Healthcare Diagnostics Manufacturing Ltd – UK
- D. Siemens Healthcare Diagnostics Products Ltd – UK
- E. Siemens Healthcare Medical Solutions Limited – Republic of Ireland
- F. Varian Medical Systems UK Ltd – UK and Ireland

The Companies fully support the aims of the Act and maintain a zero-tolerance approach to any form of modern slavery or human trafficking. Respect for human rights is a core element of responsible business conduct at Siemens Healthineers and is embedded in our values of integrity, trust, and transparency.

We recognise that, as a global healthcare technology business, our activities can have direct and indirect impacts on people, communities and societies. We therefore acknowledge our responsibility to respect internationally recognised human rights and to seek to prevent and mitigate any adverse human rights impacts associated with our operations and value chain.

As part of Siemens Healthineers, Varian Medical Systems contributes to our shared mission to advance healthcare and improve patient outcomes, including in the field of oncology. Operating as one integrated organisation with a broad portfolio of medical technologies and services, we are committed to sustainable value creation and long-term growth that is grounded in responsible business practices. This includes ensuring that forced labour, slavery, servitude and human trafficking have no place in our business or supply chains.

Our commitment

We are committed to operating free from forced labour, slavery, servitude and human trafficking and apply a **zero-tolerance approach** to these practices across our organisation and supply chains.

To support this commitment, Siemens Healthineers fosters an inclusive and ethical corporate culture and acts with integrity and transparency in all business dealings.

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2. Organisational Structure, Operations and Supply Chains

Siemens Healthineers AG is a global provider of healthcare products, solutions, and services, with activities in numerous countries around the world. Siemens Healthineers Group (hereinafter "Siemens Healthineers AG," "we," or the "Group") comprises the parent company Siemens Healthineers AG, a stock corporation under the laws of the Federal Republic of Germany, and its subsidiaries. Siemens Healthineers AG is registered in the commercial register in Munich, Germany. As of October 1, 2024, the Siemens Group held around 75% of the shares in Siemens Healthineers AG, unchanged from the prior year. In fiscal year (FY) 2025, which ended on September 30, 2025, Siemens Healthineers had approximately 74,000 employees worldwide and generated revenue of around €23.4 billion. Further information is available at www.siemens-healthineers.com. (September 30, 2024: 72,000).

The Companies trade under the trade name "Siemens Healthineers" trading in Great Britain & Ireland, and employ nearly 3,000 across sales offices, manufacturing facilities, warehouses, and service operations. The Companies are 100% owned within the Siemens Healthineers AG group of companies. The Companies' main operations are as a supplier of medical devices, parts, consumables, and reagents and a provider of associated services for the Laboratory Diagnostics and Point of Care Diagnostics healthcare portfolios. The Companies also provide value-added services such as Customer Services including product-related services, remote services, and education & skills management.

Siemens Healthineers has a strong presence and market position in growth markets and is directly represented in more than 70 countries worldwide. The Siemens Healthineers AG operates production facilities and uses manufacturing facilities, R&D facilities, office buildings, and warehouses. As of the date of this Statement, Siemens Healthineers AG has manufacturing locations in the United States, Germany, United Kingdom, China, Canada, India, South Korea, Ireland, Brazil, Spain and Luxembourg.

Our supply chain is global and complex, comprising approximately 38,000 suppliers covering areas such as medical devices, real estate, travel, externally manufactured reagents, logistics, Instruments Original Equipment Manufacturing (OEM-I), plastic parts & advisory services. Siemens Healthineers AG's procurement function is managed at headquarters level and is responsible for managing the procurement organised by material fields within commodity management. Great Britain and Ireland-specific procurement activities are managed locally in alignment with Group policies and controls.

3. Policies, Governance and Responsibilities

As part of the Siemens Healthineers group of companies, sustainable practices are firmly anchored in our corporate culture, based on our company values. We apply headquarter-developed standard principles that require employees and managers to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental, and social progress.

Siemens Healthineers AG requires that all employees and managers, suppliers, and third-party intermediaries to comply with all applicable laws and regulations based on, amongst others;

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- The Universal Declaration of Human Rights,
- International Labour Organization (ILO) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy,
- The ILO's Declaration on Fundamental Principles and Rights at Work,
- The United Nations Convention against Corruption,
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and,
- European Convention for the Protection of Human Rights and Fundamental Freedoms.

Our staff

The Companies employees in Great Britain & Ireland, including managers and the managing boards, are required to comply with Siemens Healthineers AG's Business Conduct Guidelines. These Guidelines explicitly address human rights, working conditions, prohibition of forced and child labour, non-discrimination, and freedom of association and collective bargaining. Employees are required to confirm their understanding of these Guidelines as part of the recruitment and onboarding process.

Mandatory training on supplier qualification, ethical sourcing, modern slavery risks and supply-chain resilience is provided to all employees with purchasing responsibility. Awareness of grievance mechanisms and reporting channels is reinforced through ongoing communications and training initiatives.

Our suppliers, third-party intermediaries and business partners

With respect to our supplier and business partners, Siemens Healthineers AG has applicable policies and procedures in place that ensure a uniform risk assessment of all our business partner relationships focused on human rights (including conflict minerals), corruption, conflict of interest, antitrust, confidentiality, data privacy, gifts, and hospitality.

All the Companies' suppliers, third-party intermediaries and business partners are required to adhere to the Siemens Healthineers' Group Code of Conduct for Suppliers and Third-Party Intermediaries ("Code of Conduct"), which sets out the standard of ethical, lawful, and sustainable conduct expected from our business partners. We have made responsible business practices a core element of our supplier management processes.

The Code of Conduct is based on, among others, the Ten Principles of the United Nations Global Compact, the ILO's core conventions and reflects Siemens Healthineers AG's Business Conduct Guidelines. The principles underlying our Code of Conduct are based on the UN Global Compact relating to human rights, labour standards, environmental protection, and anti-corruption initiatives and prohibit the use of forced labour and child labour by our suppliers, require our suppliers to respect the employment rights of their workers and to use reasonable efforts to promote compliance with the Code of Conduct amongst their suppliers.

Our "[Code-of-Conduct-English.pdf](#)" is also available on our implemented Compliance Management System page [Compliance](#).

Please find our relevant policies/processes here: [Sustainability in the supply chain | Siemens](#)

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- Risk Detection and Assessment
- Key pillars related to Human Rights risk: Code of Conduct, Corporate Responsibility Assessment, External Sustainability Audits, Responsible Minerals Sourcing
- Sustainability in the Supply Chain Brochure
- Code of Conduct for Siemens Suppliers and Third-Party Intermediaries Brochure
- Trainings

Our sustainability commitment

As a leading medical technology company, we understand the pivotal role we play in sustainably shaping the future of healthcare. For our journey ahead, we have raised the bar on our sustainability ambition and emphasised our commitment by embedding sustainability into everything we do. *We pioneer breakthroughs in healthcare. For everyone. Everywhere. Sustainably.*

Our [Sustainability Impact 2025 Report](#) and our [Annual Report 2025](#), published November 26, 2025, embody our ongoing commitment to transparently communicate how we are addressing sustainability challenges while creating long-term value for all of our stakeholders - patients, customers investors, employees and society.

The reports not only reflect our strategic sustainability priorities but showcases our global and local initiatives. Our sustainability strategy has been developed in closed collaboration with our stakeholders and reflect the shared understanding of our opportunities to advance healthcare toward a more resilient and sustainable future. By expanding access to healthcare, preserving our planet's resources, developing an engaged workforce and working with our partners and customers globally, we are contributing to a resilient future for healthcare.

Collective Action

We fight corruption collectively, working together with various interest groups to build an alliance against corruption. We approach and resolve the problem from multiple angles with the ultimate goal of creating fair and equal market conditions – a "level playing field" – for all market players and eliminating the temptations of corruption for all.

Collective Action at Siemens Healthineers aims to bring more opportunities to cooperate with alliances in the healthcare industry, to improve the compliance environment, and to benefit all, not only market players but also healthcare professionals and patients. We do this for example by being a member of the trade association MedTech Europe [Members - MedTech Europe, from diagnosis to cure](#) and actively working on the [MedTech Europe Code of Ethical Business Practice - MedTech Europe](#).

4. Modern Slavery Risk Assessment & Due Diligence

Global risk approach

Globally, Siemens Healthineers has a substantial and complex supply chain. With such a large and geographically dispersed supplier network, Siemens Healthineers ensures a higher priority is given to those Suppliers deemed as high risk and has implemented a system of interconnected processes and tools to stay on top of this complexity under the governance of our Global Services Supply Chain

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Management (“SCM”) function. Transparency and awareness of supply chain risks is ensured via a three-step process:

- (i) Definition of sustainability risks and categories;
- (ii) Identification of the relevant suppliers;
- (iii) Development and implementation of necessary procurement processes to cover these risks.

While Siemens Healthineers AG’s group of companies have robust processes in place to manage workplace relations, within our own organisation, we understand that the potential exposure to modern slavery increases when purchasing goods and services from third-party suppliers.

We support all our suppliers through our “Sustainability in the Supply Chain” and “Code of Conduct for Siemens Suppliers and Third-Party Intermediaries” brochures. The basis of all our supplier relationships is the commitment of our suppliers to observe the principles of the Code of Conduct. We also explicitly request them to extend these values further into their supply chain to create a network of interactions and business relations that are built on trust. Suppliers commit to the Code of Conduct by signing the relevant Corporate Responsibility contract clause as part of the onboarding and qualification process, or via the purchase order process and for all new and extended procurement contracts.

To ensure the Companies minimise the risk of modern slavery and the potential exposure to geopolitical risks including human rights, we utilise a risk-based methodology, including global scores based on the most recent Organization for Economic Cooperation and Development (OECD) and Transparency International/Corruption Perception Index (TI/CP).

Prior to selection, all higher-risk suppliers according to the risk-assessment methodology at a country level, undergo various due diligence checks including a relevant Modern Slavery compliance questionnaire. This questionnaire enables suppliers to assess whether they meet the requirements of our Code of Conduct and Modern Slavery Act statement. This process raises awareness of these requirements and ensures that appropriate compliance steps are undertaken.

Following selection, relevant high-risk suppliers are continually monitored according to a risk-based approach, and relevant suppliers are selected to conduct External Sustainability Audits.

Great Britain and Ireland-specific risk focus

Within the United Kingdom and Ireland, we have implemented the requirements of the Modern Slavery Act 2015 through our supply chain due diligence processes. In the United Kingdom and Ireland we are working on improving our risk-based supply chain mapping, informed by Siemens Healthineers’ global values and human rights principles, to identify higher-risk regions, activities and supply chain segments. Due to the nature of our products and services, potential sources of modern slavery risks include labour intensive services such as logistics, cleaning, facilities management, construction activities, and the use of temporary or agency labour by third party service providers.

As manufacturers of medical devices and in vitro diagnostics, the Companies hold the responsibility for ensuring the finished product’s conformity with applicable quality and regulatory

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requirements. Siemens Healthineers operates a structured supplier due-diligence framework aligned to ISO 13485 requirements and Group sustainability principles. This framework covers:

- **Supplier Qualification:** our supplier management processes ensure that all our third-party suppliers are onboarded following the same process.
- **Supplier Evaluation:** our third-party supplier monitoring is based on a harmonised risk management framework that depends on the specific scope of delivery and product impact. This process describes how we ensure that feedback is provided to the supplier about any deficiencies with the products or processes.
- **Supplier Development:** activities aimed at sustainable cooperation between Siemens Healthineers and our suppliers as well as the continuous identification and realisation of optimisation opportunities.

5. Measuring Effectiveness

Siemens Healthineers AG continuously develops our compliance system to adapt it to changing requirements according to our business. Detection Modules (as explained below) monitor adherence to the requirements and principles of the Code of Conduct. The Companies are required to comply with the Siemens Healthineers AG compliance system through its chain of command and business management.

Corporate Responsibility Detection Modules

We use a risk-based approach to identify sustainability-related risks in our supply chain, considering both internal and external information sources. Actions may include a development plan, a sustainability audit, or termination of the relationship with the business partner/supplier.

Internal - The internal approach is based primarily on our supplier qualification process and on supplier audits, which include an assessment of any change to modern slavery risk. These processes are designed to systematically identify potential risks in our supply chain that relate to corporate responsibility. Suppliers that perform below a certain threshold are evaluated individually to determine the next steps.

External - To identify risk we also make use of external sources. Examples of such sources are Non-Governmental Organisation databases, media reports or whistle-blower information channelled through an independent ombudswoman. In addition, attorney-at-law from the Duesseldorf-based law firm HEUKING·VON COELLN has been appointed as our external ombudswoman. Employees and third parties can confidentially and anonymously confide in this impartial professional should they observe improper business practices in the companies. 'Let Us Know' is a confidential reporting hotline which provides a secure channel for reporting non-compliant or otherwise problematic actions 24 hours a day: online, anonymously if desired, and in several languages. We protect the identity of whistleblowers and follow up on these reports. A report of a suspected case of any breach against the requirements of the Code of Conduct is kept confidential and put through a clearing process to determine the next steps e.g. an Incident Driven Inspection. Our whistle-blower hotline can also be accessed by employees and management as well as customers, suppliers, and other stakeholders.

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The following risk-based Detection Modules exist within Siemens Healthineers AG which are also applied by the Companies:

- Corporate Responsibility Self-Assessment (CRSA): a company-wide standardized online questionnaire to evaluate suppliers' compliance with the Code of Conduct. The CRSA is repeated at defined intervals on suppliers based in high-risk countries.
- Supplier Quality Audits: used to verify and continuously improve the quality and capabilities of suppliers. They may be conducted on a scheduled or 'as needed' basis.
- External Sustainability Audits: Siemens Healthineers AG has appointed internationally recognised auditing companies that conduct these on-site audits based on the principles outlined in the Code of Conduct.
- Incident Driven Inspections: carried out in cases where a suspected violation of the requirements of the Code of Conduct has occurred.

The ideal outcome of the above Detection Modules is an ongoing development of the supplier that, after the agreed implementation time, corrects all deviations from the requirements of the Code of Conduct. Should the Detection Modules demonstrate irreparable conditions, or should the proposed actions not be implemented by the supplier, the Companies have the right to terminate the relationship.

Grievances and Remediation Processes

All allegations of possible compliance violations are responded to by formal company-wide processes. The Companies will:

- Examine all reports, investigate the relevant facts, and take appropriate measures
- Not tolerate any retaliation against complainants or whistle-blowers
- Maintain confidentiality and provide whistle-blower protection in accordance with applicable legislation
- Take appropriate action in the event of demonstrable violations, including disciplinary consequences
- Apply the same principles to allegations of wrongdoings brought by suppliers and other third parties, to the extent legally permissible

6. Continuous Improvement and FY 2026 Outlook in Great Britain and Ireland

During FY 2026, Siemens Healthineers, in Great Britain and Ireland, will continue to strengthen its approach to modern-slavery risk management by enhancing supplier engagement, improving data-driven monitoring of effectiveness, and aligning GB & I practices with evolving regulatory expectations and international standards. Our focus will be on;

- (i) Continued assessment of our supply chain using risk based human rights and labour practice indicators, to help inform the identification and prioritisation of potential modern slavery risks through ongoing improved risk assessment, supply chain mapping, due diligence, remediation and monitoring processes.
- (ii) Continued implementation and enhancement of Siemens Healthineers supplier qualification management program, including periodic review of due diligence assessment procedures to help promote greater consistency, and further integration of risk assessment methodologies within new supplier onboarding process by integrating

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our risk-assessment methodology informed by OECD and Transparency International country-risk indicators where relevant and appropriate.

- (iii) Greater focus on strengthening our internal and external stakeholder engagement and targeted awareness raising activities for relevant personnel, intended to support the identification and prevention of modern slavery risks within our supply chain, including awareness of available grievance mechanisms. The Companies continue to explore opportunities to expand training coverage in line with requirements.

To further strengthen transparency and management oversight, Siemens Healthineers will enhance effectiveness monitoring during FY 2026 through selected indicators, including:

- the proportion of suppliers subject to sustainability and corporate-responsibility risk screening;
- the scope of supplier assessments and audits conducted under the risk-based framework;
- the tracking of remediation actions arising from identified findings.


These indicators support continuous improvement and informed governance, rather than reliance on static compliance assurances.

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7. Approval

This statement has been approved and signed by the board of directors of each of the Companies, with respect to the financial year ending in September 2025.


Signed by **Eric Kreuzer** the authorised representative of **Siemens Healthineers Limited**

Name	Eric Kreuzer	Signature	 <small>Electronically signed by: Eric Kreuzer Reason: I am approving this document Date: Apr 23, 2026 18:05:58 GMT+1</small>
Position	Finance Director	Date	04/23/2026


Signed by **Russell Challis** the authorised representative of **Siemens Healthcare Diagnostics Limited**

Name	Russell Challis	Signature	 <small>Electronically signed by: Russell Challis Reason: I am approving this document Date: May 1, 2026 06:46:45 GMT+1</small>
Position	Finance Director	Date	04/23/2026


Signed by **Joaquin Perez Alarcon** the authorised representative of **Siemens Healthcare Diagnostics Manufacturing Ltd**

Name	Joaquin Perez Alarcon	Signature	 <small>Electronically signed by: Joaquin Perez Alarcon Reason: I am approving this document Date: Apr 27, 2026 10:41:11 GMT+1</small>
Position	Finance Director	Date	04/23/2026


Signed by **Manish Kabra** the authorised representative of **Siemens Healthcare Diagnostics Products Ltd**

Name	Manish Kabra	Signature	 <small>Electronically signed by: Manish Kabra Reason: I am approving this document Date: Apr 24, 2026 12:21:12 GMT+1</small>
Position	Finance Director	Date	04/23/2026

Signed by **Grania Heal** the authorised representative of **Siemens Healthcare Medical Solutions Ltd**

Name	Grania Heal	Signature	 <small>Electronically signed by: GRANIA Heal Reason: I am approving this document Date: May 11, 2026 16:49:04 GMT+1</small>
Position	Country Head - Ireland	Date	04/23/2026

Signed by **Erik Garcia** the authorised representative of **Varian Medical Systems UK Ltd**

Name	Erik Garcia	Signature	 <small>Electronically signed by: Erik Garcia Reason: I am approving this document Date: May 6, 2026 12:10:33 GMT+1</small>
Position	Finance Director	Date	04/23/2026