

## **2024 Statement on the Prevention of Slavery and Human Trafficking by the Siemens Healthineers companies in Great Britain & Ireland**

### **1. Introduction**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (“the Act”). It sets out the steps the Siemens Healthineers companies in Great Britain & Ireland set out in the bullets A to F below (the “Companies”) have taken and are continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain. Siemens has been active in Great Britain & 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 are committed to operating free from forced labour, slavery, servitude, and/or human trafficking. We have a zero-tolerance approach to these practices in any form, in any part of our business or supply chain.

As a Siemens Healthineers company, Varian has long been on a mission to help create a world without fear of cancer. We are working as one, based on a more expansive perspective of the patient's journey than ever before. As a result, our vision for the future – and what we can achieve on behalf of patients – has expanded and become much more comprehensive.

Given the broad portfolio of imaging and cancer care technologies and services we offer as one unified company, we are working together to create an oncology ecosystem that enables us to support care providers along the entire cancer care continuum. Sustainable value creation is the path we choose to achieve our goal of profit-driven, long-term growth. As a global business, Siemens Healthineers with its innovative power and investment strength, assumes joint responsibility for worldwide sustainable development. We create added value for the societies, in which we operate. At the same time, our business activities (both directly and indirectly) impact the lives of many. Siemens Healthineers is aware of its responsibility to ensure respect for human rights. For us, this responsibility is a core element of responsible business conduct. Building on our Business Conduct Guidelines, we have defined the respect of human rights in additional guidelines and principles.

To unleash the power and potential of every single one of us, we're building a more inclusive culture. Guided by our values; integrity, trust, and transparency that have shaped the Siemens Healthineers culture for over 170 years, we embrace diversity in all its forms, at every level of our company.

We are committed to acting ethically, with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery occurring within the business or our supply chain.

Siemens Healthineers is committed to operating free from forced labour, slavery, servitude, and human trafficking. We have a zero-tolerance approach to these practices.

### **2. The Companies' structure, operations and supply chains**

Siemens Healthineers is a global provider of healthcare products, solutions, and services, with activities in numerous countries around the world. Siemens Healthineers Group (hereinafter “Siemens Healthineers,” “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 September 30, 2023, the Siemens Group held just over 75% of the shares in Siemens Healthineers AG, unchanged

from the prior year. In fiscal year (FY) 2024, which ended on September 30, 2024, Siemens Healthineers had approximately 72,000 employees worldwide and generated revenue of around €22.4 billion. Further information is available at [www.siemens-healthineers.com](http://www.siemens-healthineers.com). (September 30, 2023: 71,000).

The Companies trade under the trade name “Siemens Healthineers” trading in Great Britain & Ireland, and employ nearly 2800 staff, located in various locations including sales offices, manufacturing plants and warehouses and has a global network of approximately 40,000 suppliers. 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.

Globally, Siemens Healthineers AG is present in over 70 countries. The Siemens Healthineers group 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 (14), Germany (5), United Kingdom (4), China (3), Canada (2), India (2), South Korea (2), Ireland (1), Brazil (1), Spain (1) and Luxembourg (1). The Siemens Healthineers group of companies’ supply chains include the manufacture, supply and distribution, installation, service, and support of medical devices and related products and services. In this context, the Companies’ supply chain includes its overseas related companies where medical products are manufactured or produced, imported into the UK and Ireland, and subsequently sold and distributed by the Companies. Delivering high-quality, affordable healthcare requires scalable solutions to meet the needs of a broad spectrum of healthcare providers and related organizations. Siemens Healthineers is strongly positioned relative to this spectrum, which ranges from public and private healthcare providers, including hospitals and hospital systems, public and private clinics and laboratories, universities, physicians/joint medical practices, public health agencies, public and private health insurers, through to pharmaceutical companies and clinical research institutes. We offer different solutions tailored to the customers’ needs in all our markets.

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. UK and Ireland specific aspects and local procurement are handled by the Companies. The main commodities being sourced are medical devices, real estate, travel, externally manufactured reagents, logistics, Instruments Original Equipment Manufacturing (OEM-I), plastic parts & advisory services.

### **3. Risk of modern slavery practices in the operation and supply chains of the Companies**

#### **Policies and governance**

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. Our fourth Sustainability Report provides a comprehensive overview of the progress we made on environmental, social, and governance (ESG) performance in FY 2024 and highlights the key initiatives we drive to realize our high ambition. This year, we set new commitments to expand patient impact through healthcare access, made significant progress in decarbonization in our operations, and engaged our employees and strategic partners in creating transformative outcomes that are scalable.

Our FY 2024 Sustainability Report, ‘[Annual Report 2024](#)’ published November 26, 2024, embodies our ongoing commitment to transparently communicate how we are addressing sustainability challenges while creating long-term value for our stakeholders. It provides a comprehensive overview of our environmental, social, and governance (ESG) performance for FY 2024, and highlights key initiatives and progress toward the high ambition that we set for areas in our sustainability materiality assessment.

This will be our last sustainability report prepared in reference to the Global Reporting Initiative (GRI) Standards. Beginning in FY 2025, as required under European Union law, our future sustainability reporting will comply with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). The CSRD defines a broader scope of requirements

for companies to provide non-financial public disclosures on ESG topics and mandates that companies report on sustainability-related impacts, opportunities, and risks, including relevant ESG disclosures as defined by the ESRS.

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 – the Universal Declaration of Human Rights, International Labour Organization (ILO) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, and its 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.

Within the UK and Ireland, we fully deployed Modern Slavery Act 2015 and through our supply chain processes, which includes risk-based supply chain mapping and we have used Siemens Healthineers global values to determine our risk regions and activities. Due to the nature of our products and services, potential sources of modern slavery risks include manufacturing sites in high-risk countries; mineral sourcing deep in our supply chain; and the use of low-skilled and/or migrant workers by our subcontractors.

### Our staff

The Companies employees in Great Britain & Ireland, including managers and the managing boards are required to agree to comply with Siemens Healthineers AG's Business Conduct Guidelines. These Guidelines mandate how we conduct business, and act within our companies about external business partners on various topics that include basic working conditions and human rights, the elimination of child labour, abolition of forced labour, prohibition of discrimination, and rights to freedom of association and collective bargaining. Employees are required to sign a statement that they have read and understood the Business Conduct Guidelines as part of our recruitment process.

Siemens Healthineers has online training modules entitled "Supplier Qualification: Ready for Business". This training is mandatory for all employees with purchasing responsibility and highlights the importance of the Siemens Healthineers' Group Code of Conduct for Suppliers and Third-Party Intermediaries, Great Britain & Ireland Sales/Services, Modern Slavery and Supply Chain Resilience.

### **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](#)

### Our business partners

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

All of the Companies' 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 but also 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](#).

### **Due Diligence of suppliers in the Companies' supply chain**

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 requirements. The relevant Company from the Companies is the UK and Ireland importer and sponsor of Siemens Healthineers AG medical devices. Regulatory and quality system requirements such as the International Standards Organisation's ISO 13485 – Medical Devices, to which Siemens Healthineers AG is certified, require the manufacturer to establish appropriate controls for all products and services obtained from both "external" and "internal" suppliers. A key part of this is ensuring that our suppliers agree contractually to abide by the Code of Conduct.

The Companies maintain appropriate supplier quality management processes that meet applicable local legal and regulatory requirements as well as the requirements established by Siemens Healthineers AG. We evaluate and review our sustainability principles as part of the overall supplier quality management process at the following levels:

- **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.

For further information in relation to our process for selection, risk assessment, and monitoring of suppliers, please refer to section four below.

## **4. Actions taken to assess and address risks, including due diligence and remediation processes**

### **Assessment and mitigation of modern slavery risk**

Siemens Healthineers globally 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 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 suppliers 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, and risk assessed. Suppliers are asked to sign up for a sustainability portal that reviews relevant issues such as the environment, labour and human rights, ethics, and sustainable procurement. If the process reveals infringements of our requirements, they must be remedied by the suppliers in question within a reasonable period. We reserve the right to end the supplier relationship in the event of serious infringements, such as evidence of slavery, servitude, human trafficking and forced labour.

## **5. How the Companies assess the effectiveness of its actions**

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.

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

- 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. Our Approach and Progress to Date**

- A. Continued assessment of our supply chain using a human rights risk and labour practices index to reduce our exposure to modern slavery risk through improved risk assessment, supply chain mapping, due diligence, remediation and monitoring processes.
- B. Continued implementation and enhancement of Siemens Healthineers supplier quality management program by reviewing our due diligence assessment procedures to ensure standardization, including improving our new supplier onboarding process by integrating additional risk-assessment methodology (which allows us to categorise suppliers from lower / higher risk countries based on OECD and TI/CP Indexes as a determining factor).
- C. Greater focus on broadening our internal and external stakeholder engagement and development training for key personnel to raise awareness of how to detect and prevent modern slavery risks in our business and supply chain, including available grievance mechanisms. The Companies continue with the investigation of further training provisions to capture additional employees and new requirements.

### **Other information – Our sustainability commitment**

As a leading medical technology company, we understand the pivotal role we play in sustainably shaping the future of healthcare. With our Sustainability Report, we not only look back at our progress and key achievements, but we also look forward. For our journey ahead, we have raised the bar on our sustainability ambition and emphasized our commitment by embedding sustainability into everything we do. We pioneer breakthroughs in healthcare. For everyone. Everywhere. Sustainably.

In our fourth Sustainability Report, we present our achievements in FY 2024 and describe how we are living up to our purpose. It highlights our key sustainability challenges and opportunities and the many ways in which we are responding to them. Throughout the fiscal year, we focused on elevating our sustainability ambitions to the next level, taking into account the valuable input from our stakeholders since the beginning of our sustainability journey. In FY 2024, we took action to boost our efforts for a sustainable future to drive greater business and societal impact. We listened to our employees, investors, customers, and other stakeholders and raised the bar on our sustainability commitment:

[Our Sustainability Report \(siemens-healthineers.com\)](https://www.siemens-healthineers.com)


### **Our commitment**

We will continue to apply a zero-tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.


This statement has been approved by the board of directors of each of the Companies, with respect to the financial year ending in September 2024.

## Signature Page


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: Mar 29, 2025 08:27 GMT</small>
Position	Finance Director	Date	Mar 29, 2025


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: Mar 31, 2025 09:14 GMT+1</small>
Position	Finance Director	Date	Mar 31, 2025


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: Mar 31, 2025 09:22 GMT+1</small>
Position	FD	Date	Mar 31, 2025


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: Mar 31, 2025 09:27 GMT+1</small>
Position	Finance Director	Date	Mar 31, 2025

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: Mar 31, 2025 12:37 GMT+1</small>
Position	Country Head	Date	Mar 31, 2025

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: Mar 31, 2025 13:44 GMT+1</small>
Position	Finance Director	Date	Mar 31, 2025