



Modern Slavery Statement

Effective Date 24th November 2024

Introduction

Section 54 of the UK Modern Slavery Act 2015 provides information regarding organisations' efforts to address the issue of slavery and human trafficking

This statement constitutes the slavery and human trafficking statement of Corza Medical, Inc. ("Corza", including Corza's corporate affiliates) and the steps that we have taken to help ensure modern slavery is not occurring in our business or its supply chains.

We believe that all people should be treated with dignity and respect and as such have a zero- tolerance approach to modern slavery, human trafficking and forced labour.

Company Overview

Corza is a leading global manufacturer of innovative surgical technologies. With a global team of over 1,800 employees supporting clinicians, distributors and medical device companies worldwide, Corza provides healthcare professionals a platform of surgical technologies with industry-leading brands.

Our policies

Corza is committed to ensure there is no modern slavery or human trafficking in any part of our business, which includes the supply chains servicing us.

Our Code of Conduct, underpins our commitment to strive for the highest standards of ethics and integrity in all of our business relationships.

In particular, Corza is committed in ensuring the following minimum labour standards are observed:

- **Child Labour** - Corza does not engage in or support the use of child labour. If Corza engages any younger workers (e.g., on work experience), Corza will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.
- **Forced & Compulsory Labour** - Corza shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.
- **Health & Safety** - Corza provides a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimizing, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during their employment. Employees shall have access to clean, sanitary facilities and drinking water. Responsibility for implementing the Health & Safety elements of this statement is assigned to responsible managerial personnel.
- **Freedom of Association** - The freedom of association is respected, and the company will comply with local labour relations legislation in this regard.

- Discrimination – Corza shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination. The Company has appropriate policies to provide protection from discriminatory practices, which are available to all employees at induction.
- Disciplinary Practices - Corza shall treat all employees with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.
- Working Hours - Corza shall comply with applicable local laws and industry standards on working hours and holiday entitlements.
- Remuneration - Corza shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

Supply Chain and Procurement

Globally we conduct appropriate, risk-adjusted due diligence activities on all suppliers before allowing them to become an approved supplier.

There are several legal entities within the Corza group, and they are all covered within this overarching statement and each will then have a separate Appendix to cover their specific supply chain.

We are committed to ensuring transparency in our own business and our supply chains and expect similar due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks.

We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk

We require our suppliers, as part of the selection process and auditing, to confirm adherence to our Code of Conduct.

We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices.

Such as:

- Aggressive pricing that doesn't consider sustainable production costs
- Short lead times and late high-volume orders
- Inaccurate forecasting
- Late or extended payments
- Withdrawing from contract at the last minute
- Enforcing unfair penalties for not meeting orders
- Making last minute changes to order specifications or volumes
- Providing inaccurate specifications

Areas of risk identified within the business and supply chain

We conduct supplier risk assessments using the criteria below and these are reported within the specific entities appendix.

Modern Slavery Compliance KPI

Purpose

To establish and monitor a measurable key performance indicator (KPI) to ensure compliance with the UK Modern Slavery Act and demonstrate the company's commitment to ethical sourcing and operations.

Scope

This policy applies to all procurement, supply chain, and vendor management activities within the company.

KPI Definition

KPI Name: Percentage of Suppliers Screened for Modern Slavery Risk

Objective:

- Ensure that all suppliers undergo due diligence to identify and mitigate modern slavery risks in the supply chain.

Target:

- **Year 1:** 50% of suppliers screened using a standard risk assessment
- **Year 2:** 75% of suppliers screened using a standard risk assessment.
- **Year 3 and beyond:** 100% of suppliers screened annually.

Risk Assessment Procedure

1. Determine Risk Level Using the Global Slavery Index:

- Assess the supplier's country risk level using the **Global Slavery Index** (<https://www.globalslaveryindex.org>).
- Assign a risk level (Low, Medium, or High) based on the index rankings.

2. Cross-reference Goods with the U.S. Department of Labor List:

- Review whether the goods or services provided by the supplier appear on the **U.S. Department of Labor's List of Goods Produced by Child or Forced Labor** (<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>).
- Flag suppliers providing high-risk goods or services for further assessment.

3. Check Against ILO's Global Estimates of Modern Slavery:

- Evaluate the supplier's industry sector against the **ILO's Global Estimates of Modern Slavery** to identify whether it falls within a high-risk category.

4. Apply Assessment Criteria to Determine Overall Risk Level:

- Risk is categorized based on the following criteria:
 - **0 or 1 Risk Factor Identified** – Low Risk
 - **2 Risk Factors Identified** – Medium Risk
 - **3 Risk Factors Identified** – High Risk

5. Document Risk Assessment Findings:

- Maintain detailed records of assessments, including country risk, goods risk, and sector risk, to provide evidence of compliance.

6. Develop and Implement Corrective Actions:

- For Medium and High Risk suppliers, initiate Corrective Action Plans (CAPs) to mitigate risks and ensure alignment with ethical labor practices.

7. Annual Reassessment:

- Conduct annual risk assessments or reassess suppliers when significant changes occur in operations, location, or sector.

KPI Definition

KPI Name: Updates of the Modern Slavery Statement and completion of the UK Modern Slavery Assessment Tool (MSAT)

Objective:

- Ensure compliance, due diligence and transparency

Target:

- Update and publish the Modern Slavery Statement annually and complete the MSAT yearly

KPI Definition

KPI Name: Employee training on Modern Slavery

Objective:

- Ensure awareness of Modern Slavery within the organisation

Target:

- **Year 1:** 50% of employees trained on Modern Slavery
- **Year 2:** 75% of employees trained on Modern Slavery
- **Year 3 and beyond:** 100% of employees trained on Modern Slavery

Training of employees around Modern Slavery

Corza Medical provides training and awareness-raising activities to employees to help them understand the risks of modern slavery and human trafficking and how to prevent it.

Reporting

If a case of Modern Slavery is suspected, then 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.

Helpline 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

Employees and suppliers are encouraged to speak up and report ethical concerns. To facilitate this Corza has an independently managed secure and confidential online and telephone whistleblowing facility, this is available to all employees 24 hours a day, 7 days a week in multiple languages.

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 organization.

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 remember 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

This document is maintained and is the responsibility of the Chief Compliance Officer, with support from appropriate personnel who are responsible for Corza's supply chain across its business units.

Review and Communication

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

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

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

SIGNED: /s/  Signed by:
NAME: Jason Abair 84F3A81BA61F4E3...
JOB TITLE: VP, Legal and Chief Compliance Officer
DATE: 25/11/2024