

Brainlab Ltd. slavery and human trafficking statement

Financial Year 2019

(October 1, 2018 to September 30, 2019)

In attendance to Section 54, Part 6 of the Modern Slavery Act 2015, Brainlab Ltd., UK provides the following statement:

Business overview

Brainlab Ltd., UK markets and services software-driven medical technology that enables procedures that are more precise, less invasive, and therefore less expensive than traditional treatments. Among the core products are image-guided systems that provide highly accurate real-time information used for navigation during surgical procedures.

Together we are making medical technology and knowledge more impactful and accessible to physicians and their patients. In practice, we provide products and services that benefit every treated patient and satisfy the needs and expectations of all customers.

Brainlab is headquartered in Munich, Germany and operates offices in 18 locations across Europe, Asia, Australia, North and South America.

Relevant Standards and Requirements

As customers, we play an active role in supplier development and have adopted various means to clearly communicate our expectations to our suppliers. Brainlab's Supplier Quality Manual reinforces the Good Manufacturing Practice (GMP) as a set of regulations to assure quality in production and all other involved areas. GMP regulates fundamentals, how products shall be manufactured according to today's ethical and quality related understanding. These regulations are mandatory for manufacturers of medical devices and therefore valid for Brainlab and our suppliers of medical devices. We recommend that all of our suppliers, also those not delivering medical products, will keep with the GMP regulations as well. The strict adherence of the GMP regulations is fundamental when collaborating with Brainlab.

Brainlab complies with the following social, ethical and ecological requirements and our suppliers have to meet them as well:

- operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations
- employees must meet minimum legal age requirement

- wages and working hours have to be set following the applicable laws. Employees shall receive at least the minimum legal wage or a wage that meets the local industry standards, whichever is greater.
- no forced labor
- no discrimination of employees based on race, origin, gender, religious beliefs, disability, age, maternity or sexual preferences
- employees must be given freedom of association

Risk assessment and due diligence

We assess that there is no risk of slavery and human trafficking since we mainly source medical equipment from our headquarters in Germany and procure otherwise from businesses in the UK.

Further, we apply our employment practices in line with UK legislation.

Training and Monitoring

Mutual respectful conduct and fair treatment are part of our Code of Conduct training.

We do not have key performance indicators in relation to slavery or human trafficking as any instance would be expected to be a non-compliance and breach of employment laws, our direct employment practices, Code of Conduct, wider Group policies and / or supplier standards.

We have an Integrity & Compliance Program which is addressing legal requirements as well as supporting internal guidelines, procedures and values.

Our Integrity & Compliance Program supports and protects Brainlab and employees in their decisions and actions in challenging ethical situations and shall also promote correct and compliant behavior in order to avoid mistakes and sanctions. Compliance within Brainlab is the basis for all business related activities and is closely linked to one of the company's core values, Integrity.

Brainlab offers a Compliance Helpline for employees and external parties, like suppliers or customers, who would like to ask compliance related questions, make a suggestion or report potential or actual criminal conduct or serious non-compliant behavior.

The Compliance Helpline can be accessed, if desired anonymously, via a secure website hosted by an external third party or by phone with a live operator 24 hours a day in various languages.

Munich, October 1st, 2019.



Nils Ehrke

Managing Director