

Human Rights Policy

We, Brainlab, are committed to respecting human rights and environmental obligations within our supply chain and consider the protection of human rights as a core element. We implement applicable law, respect internationally recognized human rights and environmental standards and take all necessary care to prevent human rights abuses and environmental pollution in our business activities. In particular, we condemn all forms of child and forced labor, all forms of slavery and (modern) human trafficking, and all forms of discrimination. We are also committed to complying with the labor protection laws applicable at the respective place of employment, the payment of adequate wages and the protection of our employees' freedom of association.

Procedure for implementing the due diligence obligations according to the German Supply Chain Due Diligence Act

Responsibility with regard to the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) has been delegated by the Executive Board to the Compliance and Purchasing departments.

In order to comply with our due diligence obligations under the German Supply Chain Due Diligence Act, we have established the following processes within our own business unit and, where necessary, towards our direct and indirect suppliers:

- We have established a human rights-related risk management system and anchored it in all relevant business processes, especially in purchasing, supplier selection and management, and in the distribution of our products and services.
- As part of the risk management, we conduct an annual and event-related risk analysis to identify human rights and environmental risks affecting human rights along our supply chain. This involves looking at risks by country and material used, and assessing them based on our experience in the medical device sector. If necessary (e.g. in the case of a supplier with an increased risk), further relevant processes and measures are initiated. The following preventive measures have been established or strengthened:
 - In our own business unit: Adjustment of order and supplier approval processes, staff training.
 - For direct suppliers: Expansion of the existing audit questionnaire to include questions on human rights risks.
 - For indirect suppliers: None.

If our risk analysis shows that a violation of a human right or environmental obligation affecting human rights has already occurred or is imminent, we immediately take the following remedial measures:

- In our own business unit: In the event that we ourselves have directly caused the violation, we work quickly to stop the business activities causing the violation or to make them compliant with human rights or environmental law.
- In the case of direct and indirect suppliers who supply product-relevant articles or materials have caused the violation: Development of an action plan with the direct supplier to remedy the



violation, monitoring of the implementation of the measures, termination of the business relationship if the breach of duty is not remedied. Depending on the severity of the violation, we reserve the right to further appropriate response options.

- For other direct suppliers: Immediately block the order release of the supplier concerned.

Irrespective of the risk analysis and the risks discovered there, we have set up a compliance helpline that enables all affected persons to point out human rights and environment-related risks as well as violations of human rights and environment-related obligations. The complaints procedure and helpline is publicly accessible via our [homepage](#) or phone.

Incoming tips or complaints are examined by Brainlab's Compliance Department. Anonymous reporting is possible; protection of identity is ensured by the reporting office's external service provider. We regularly monitor the effectiveness of the complaints procedure.

Starting on January 1, 2024, we will publish an annual report on the fulfilment of our due diligence obligations according to the German Supply Chain Due Diligence Act. It will be published on our website no later than four months after the end of our financial year (September 30th) and will be available free of charge for a period of seven years.

In addition to this policy statement, human rights and environmental requirements can also be found in other internal standards, e.g. in our Code of Conduct, the Environment, Health and Safety Policy, or the Occupational Health and Safety Program. These are regularly reviewed as part of external audits.

Our human rights and environmental priorities

As part of our risk analysis, we did not identify any risks for human rights and environment-related issues affecting human rights that we consider to be priorities due to their nature and scope, as well as their potential significance for our company.

Our expectations towards our own staff and our suppliers

The principles outlined in this policy statement apply both to our own business, i.e. our employees, and to our suppliers in the supply chain.

Our employees comply with these principles within the framework of existing business processes, and a code of conduct is part of our training program.

We expect our suppliers and business partners to also commit to our principles and to develop and embed appropriate and effective processes to both address and prevent risks and violations, and to detect further potential risks.

This policy statement of Brainlab AG was adopted by the company management on October 01, 2023.