

Report on Supply Chain Due Diligence

Fiscal Year 2023 (October 01, 2022 to September 30, 2023)

In attendance to §10 (2) 1 to 4 of the German Supply Chain Due Diligence Act 2021 (Lieferkettensorgfaltspflichtengesetz), Brainlab AG provides the following statement.

Business overview and supply chain structure

Brainlab 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. As a principle, Brainlab has a centralized purchasing system. The majority of our suppliers are located in Germany and we procure most goods and services from businesses in Germany or EU.

Policy and Commitments

Brainlab complies with social, ethical and ecological standards.

These standards are embedded into our Integrity & Compliance Program which addresses legal requirements as well as covers 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.

Our commitment can be found in our Human Rights Policy.

Further, we apply our employment practices in line with EU and UK legislation. Mutual respectful conduct and fair treatment are part of our Code of Conduct training and followed throughout all our activities.

Due diligence processes

In order to comply with our due diligence duties we carry out the following measures:

- Conduct regular risk assessments across product related and non-product related supply chains, and services.
- Implemented risk management measures across relevant business operations, such as setting clear supplier requirements (see below).
- Conduct preventive measures such as: Adaptation of order and supplier approval processes, training of employees.



We have appointed internal responsibilities for monitoring human rights due diligence processes. The progress is reported regularly to top management. Measures are considered effective.

Requirements towards our suppliers

We play an active role in supplier development and have adopted various means to clearly communicate our expectations to our suppliers. Suppliers must meet the same social, ethical and ecological requirements that Brainlab commits to (see above).

Furthermore, 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.

Grievance Mechanism

Brainlab offers a Compliance Helpline for employees and external parties, like suppliers or customers, or others who would like to ask compliance related questions, make a suggestion or report potential or actual criminal conduct or serious non-compliant behavior. This explicitly includes actual or potential violation regarding human rights or environmental obligations in our supply chains.

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.

Monitoring

We do not have key performance indicators in relation to human rights obligations, 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.

Risk assessment and management

We assess that in the past fiscal year we:

- Have not identified any risk regarding human rights or environmental obligations in our supply chains.
- Have not identified any violation regarding human rights or environmental obligations in our supply chains.
- Have not received any complaint, notification or other sort of report regarding actual or potential violation of such obligations in the Brainlab supply chain or own business operations.

Further information

For further information visit www.brainlab.com/compliance, or contact us at sustainability@brainlab.com