

Modern Slavery and Human Trafficking Statement 2023

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 of the United Kingdom. It sets out the steps, we have taken to ensure transparency in our business activities and combat modern slavery and human trafficking in our business and supply chain.

Modern Slavery is a term used to describe both offences in the Modern Slavery Act, such as slavery, servitude and forced or compulsory labor, child labor and human trafficking.

According to the latest global estimates on modern slavery, 50 million people were living in forms of modern slavery in 2021. Of these, 28 million were trapped in forced labor and 22 million in forced marriages. The number of people living in modern slavery has increased significantly over the last five years. In 2021, ten million more people were in modern slavery than in 2016, with women and children remaining particularly vulnerable.

While Modern Slavery and human trafficking is generally not considered a concern among our direct suppliers, no company or sector is completely immune to forms of Modern Slavery.

We are committed to improving its practices to address the risks regarding Modern Slavery and human trafficking and to take appropriate measures to prevent any incidents of such kind within the organization and the supply chain.

This statement applies to all subsidiaries of Nihon Kohden Europe until the end of the financial year of 2022.

Organization

Nihon Kohden is one of Japan`s leading suppliers in advanced medical technology with more than 5000 employees worldwide. Nihon Kohden Europe GmbH with headquarters in Rosbach v.d.H. is responsible for the European market since 1985, along with the European subsidiaries Nihon Kohden Italia, Nihon Kohden Iberica, Nihon Kohden France, Nihon Kohden Germany, and Nihon Kohden United Kingdom.

Nihon Kohden's products are manufactured in its four international manufacturing bases, the main factory being the Tomioka Production Center in Tomioka, Japan.

Applying the corporate philosophy - *Improving Healthcare with Advanced Technology* – to all business activities, Nihon Kohden is committed to overcome diseases with high quality healthcare products and solutions, considering the best interest of patients, and society at all times.

Due Diligence

We take the global risk of Modern Slavery with regards to its distributors, suppliers, logistic or financial intermediaries, end customers and other types of business partners very seriously.

In 2021, we pioneered in the field of a digitized and thoroughly organized Compliance process with a new Due Diligence IT-tool, that involves every business partner.

We take a risk-based approach, using a “State of the Art” scoring system, that ranks every business partner from low risk to high risk. Higher risk business partners are subjected to a detailed Due

Diligence process that includes a thorough screening for illegal activities of the business partner and the individuals acting on behalf of the business partner.

Wrongdoing in the field of Modern Slavery give reason to terminate the business relationship with immediate effect.

Risk Assessment

In the process of achieving an exceptional Compliance Management System, Risk Assessments are performed systematically and periodically. To mitigate risks of Modern Slavery, we continuously assess the measures taken and seeks to take global and social responsibility to protect human rights.

Corporate Values

As a company in the healthcare sector, responsible business practices with high ethical standards and integrity are the foundation of every business relationship and action within the organization.

We have recently revised our corporate values, which we will live internally and externally in the future and pay increased attention to their enforcement. Our actions align with our values. We implement these actions through effective management systems.

Every employee is expected to align with the Code of Ethics and Conduct, which sets out the basic Compliance rules and regulations and must be carefully read, understood and considered in all aspects. The respect of human rights is the most important imperative of this policy.

Reporting

In 2022, we have introduced a fully digitized, easily accessible and independent Whistleblowing System.

The Whistleblowing Policy allows employees to raise concerns about any kind of wrongdoing in a safe and anonymous way. As a company, we are committed to create a safe work environment of open dialogue and to encourage employees to report any illegal or unethical behavior.

Employees are trained with regards to their obligation to report breaches.

Violations of human rights are considered among the most severe offences and lead to immediate action. We pursue a zero-tolerance policy when it comes offences against human rights.

Transparency in supply chains

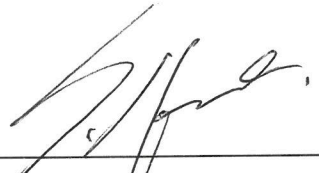
We constantly strive to improve the measures taken, to ensure that Modern Slavery is not taking place in the organization or supply chains.

Our goal in 2023 is to take even stronger action to prevent all forms of forced and compulsory labor in our supply chain. For this reason, we are currently working to require all our suppliers to sign our own Code of Conduct. This Statement will be reviewed and published annually.

Board Approval

This Modern Slavery Statement has been approved by the Board of Directors of Nihon Kohden Europe.

Signed:



Shinya Hama, President and Managing Director



Heinrich Raisch, Local Compliance Officer