

MEDARTIS LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Purpose of this policy

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”) and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Medartis Limited is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners, and as such we work only with certified suppliers. We have products of a high technical level and work only with *ISO 13485* certified suppliers. Our supply chains include approximately 30 certified suppliers from Switzerland, Germany and the USA. For the raw material which we use, Titanium, we have a certificate that it is mined in Japan or the USA.

We have zero tolerance to slavery and human trafficking.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The General Manager and Global Compliance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and

regular training on it and the issue of modern slavery and human trafficking in supply chains.

- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the General Manager of Medartis Ltd.

3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery or human trafficking in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify the General Manager of Medartis Ltd as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. Our Whistleblowing Procedure within the Code of Conduct allows employees to report concerns about suspected modern slavery or human trafficking.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery or human trafficking in any parts of our business or supply chains at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the General Manager of Medartis Ltd or report it in accordance with our Whistleblowing Procedure as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery or human trafficking, raise it with General Manager of Medartis Ltd.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any retaliation as a result of reporting in good faith their suspicion that modern slavery of whatever form or human trafficking is or may be taking place in any part of our own business or in any of our supply chains.

Retaliation includes dismissal, disciplinary action, threats or other unfavourable or detrimental treatment connected with raising a concern.

4. Communication and awareness of this policy

- 4.1 We provide training to all staff on this policy to ensure a high level of understanding of the risks of modern slavery and human trafficking in our

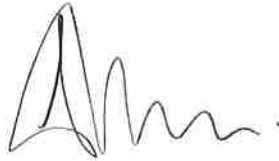
supply chains and our business, with detailed training for our procurement staff so that they are aware of what to do if they suspect that modern slavery or human trafficking is taking place within our supply chain.

- 4.2 Our commitment to addressing the issue of modern slavery and human trafficking in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them by the sharing of this policy with them, and reinforced as appropriate thereafter.

5. Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for serious misconduct or gross negligence.
- 5.2 If any member of our supply chain is found to be using modern slavery or be party to human trafficking either directly or indirectly we will immediately cease working with them and report them to the appropriate authorities.
- 5.3 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

First Adopted: September 1st 2017



GENERAL MANAGER

Medartis Ltd

Date: 11th June 2018