



## Elekta Modern Slavery and Human Trafficking Statement FY 2022/23

This is the Elekta Limited modern slavery and human trafficking statement for the financial year ending 30 April 2023, pursuant to section 54 of the Modern Slavery Act 2015. It has been approved by the board of directors.

Statement from MD Elekta Ltd:

*“We are strongly committed to human rights and employees’ rights and are supportive of the UK Government’s objective to eradicate modern slavery and human trafficking and will play our part in the furtherance of this objective. We require the same from all our business partners, including suppliers and contractors. This statement describes the steps we have already taken and propose to take going forward to help ensure that modern slavery and human trafficking does not occur in our supply chain or business. We intend to build on our policy and processes as we work to continuously deliver on our commitment and implement the steps described below.”*

### **Our business, structure and supply chains**

Elekta is a human care business pioneering significant innovation and clinical solutions for treating cancer and brain disorders. We develop state-of-the-art tools and treatment planning systems for radiation therapy including brachytherapy and radiosurgery, as well as workflow enhancing software systems across the spectrum of cancer care. Stretching the boundaries of science and technology, providing intelligent and resource-efficient solutions that offer confidence to both health care providers and patients, Elekta aims to improve, prolong and save patients’ lives.

Elekta’s solutions in oncology and neurosurgery are used by over 6,000 customers worldwide. Elekta employs more than 4,600 employees spread globally across 29 countries. Elekta’s manufacturing is located in China and in Europe. The corporate headquarters are located in Stockholm, Sweden, and the parent company, Elekta AB, is listed on NASDAQ Stockholm. Elekta Limited is a wholly owned subsidiary of Elekta AB and is predominantly responsible for Elekta’s Linac and MR-Linac portfolios, UK sales and services and management control of EMEA sales and services and the distributor network for the Linac/MR-Linac portfolios.

Elekta has a global base of nearly 940 suppliers to the Group’s manufacturing processes. Measured by spend value, suppliers in EMEA account for about 63 percent), suppliers in APAC contributing around 19 percent and Americas the remaining 18 percent.

Elekta’s Procurement Function is responsible for ensuring supply chain implementation and compliance to the Supplier Code of Conduct. Elekta’s revised Sustainable Sourcing Program is managed by the Sustainable Sourcing Forum and includes procurement directors and representation from Compliance.

Further details on Elekta can be found at our website and in our [annual report](#), which includes the annual sustainability report (p. 74-94).

### **Our policy on modern slavery and human trafficking**

Our commitment to human rights is set out in the Elekta Code of Conduct, which is applicable to everyone working for and on behalf of Elekta; employees, consultants, controlled companies as well as suppliers and business partners. The [Code of Conduct](#), available at our website, prohibits any form of forced, compulsory or child labour and proclaims the right to fair wages including time

to rest, overtime compensation and holidays. It is also outlined in our People & Human Rights policy that Elekta does not accept the use of forced labour, including debt bondage, trafficking and other forms of modern slavery or work performed under the threat of a penalty or coercion.

In addition, the Elekta Supplier Code of Conduct, includes requirements on Elekta's suppliers, as regards human rights and labour rights and the sourcing of conflict minerals. It is based on internationally established human rights enshrined in the International Bill of Human Rights, as well as fundamental rights at work and international labor standards enshrined in the Core Conventions of the International Labour Organisation, including the prohibition of forced labour, modern slavery and human trafficking. All Elekta direct suppliers must commit to adhere to the Elekta Supplier Code of Conduct and communicate these principles upstream to their suppliers. The full version of the [Elekta Supplier Code of Conduct](#) is available on our website.

### **Due diligence process**

We select suppliers through our Sourcing process that includes quantitative and qualitative assessment criteria that are governed by our Sourcing Board, commercial contracting and quality assurance processes.

A key part of our sustainability ambition is our Sustainable Sourcing Program, which is a due diligence and continuous improvement program aimed at building a win-win relationship with our suppliers to manage risk and drive value creation, while identifying opportunities for improvements in our supply chain. The program covers a range of sustainability requirements, and aims to identify and mitigate any non-conformances with Elekta's Supplier Code of Conduct.

Elekta categorizes procurement activities into either direct or indirect sourcing. In 2022/23, direct procurement performed 31 supplier ESG assessments in the SSP. The assessment process does not constitute a full audit. During the assessments, 16 observations were made. Elekta has reported the findings to the suppliers and requested corrective action. None of the findings we classified as high risk. No supplier commercial contracts have been terminated, and we continue to engage with the suppliers to build collaboration across the supply chain. (In Elekta's traditional supplier audit process, ESG questions are occasionally covered and not accounted for in this reporting.)

### **Origin of materials**

The Supplier Code of Conduct requires suppliers to make reliable determination of the origin and source of materials and minerals in products, parts and components procured by Elekta. The parts of Elekta's supply chains where there is potentially most risk of slavery and human trafficking are predominantly in extraction of metals and minerals and in transportation. Such risks are more likely further upstream and in the manufacturing stage of our supply chain.

Our membership in Responsible Minerals Initiative (RMI) membership provides us with tools and resources to further improve mineral supply chain traceability. In 2022/23, all suppliers of products with tungsten used smelters validated by the Responsible Mining Initiative. All suppliers of cobalt have signed Elekta's Suppliers Code of Conduct or equivalent. Elekta is using minor quantities of tantalum, tin and gold.

### **Training and whistleblowing**

To ensure that our staff understand and can identify modern slavery and human trafficking risks in supply chain and business, we have developed and provided appropriate training for procurement professionals. In 2022/23, selected procurement employees (around 20 people) attended ESG sessions (legislation, human rights, supplier engagement for science-based targets), around 25 hours per individual.

Our staff is informed about the government's 24-hour modern slavery public telephone helpline (+44 (0)800 0121 700). In addition, Elekta's global whistleblower tool, the "Elekta Integrity Line",

managed by an external service provider, can be used by anyone (internal or external of Elekta) for anonymous reporting of any suspected violations of the law, or concern in connection with, the Elekta Code of Conduct. Elekta Integrity Line is available 24/7, 365 days per year and enables persons to report via phone or email in all applicable languages.

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