

Hamilton Medical AG's Modern Slavery Statement

This is Hamilton Medical AG's slavery and human trafficking statement under the UK Modern Slavery Act 2015 for the financial year 2024. It provides an overview of the measures that Hamilton Medical AG took during the financial year ending 30 November 2024 to prevent modern slavery in its own business and its supply chains.

Introduction to Hamilton Medical AG

Hamilton Medical AG was founded in Bonaduz (Switzerland) in 1983 and is still headquartered there today. The company has subsidiaries in six countries with over 900 employees and is represented by exclusive distribution partners in over 100 countries around the world. Its UK subsidiary, Hamilton Medical UK Ltd., was established in 2009. All subsidiaries exclusively purchase their products from Hamilton Medical AG and then directly sell them to our end customers.

In this statement, unless otherwise specified, "Hamilton Medical" shall mean Hamilton Medical AG including Hamilton Medical UK Ltd.

Hamilton Medical has made it its mission to make the jobs of medical teams easier, and their workflow even more effective. Hamilton Medical wants to help its fellow humans – with ventilation technologies that are safe, effective, and lung-protective. Hamilton Medical is reliable, experienced, and dedicated to respiratory care, and creates ventilation solutions, from mechanical ventilators to accessories, consumables, and everything in between.

At Hamilton Medical we are committed to upholding high ethical standards and complying with all applicable local, national and international laws, regardless of where we operate. For Hamilton Medical, integrity in business is the foundation for fair and responsible cooperation. We have therefore established processes to ensure that our employees and suppliers comply with the relevant laws, regulations, and industry-specific codes of conduct.

Modern Slavery

Hamilton Medical fully endorses the Modern Slavery Act 2015 in order to end all forms of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). We recognize the importance of companies working together to effectively address these global challenges. We are aware of our responsibility to identify and counteract such abuses. We therefore expressly encourage our employees and business partners to report to us any suspected cases where they believe that such misconduct has occurred, is occurring, or is likely to occur.

Policies and Business Conduct

Hamilton Medical respects and promotes human rights throughout our entire supply chain, and recognizes, supports, and respects the UN Guiding Principles on Business and Human Rights (UNGPs) with its “Protect, respect, and ensure legal protection” approach. We are committed to complying with the Ten Principles of the UN Global Compact; the Universal Declaration of Human Rights; and the Fundamental Labour Rights stipulated by the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. Our commitment is firmly anchored in the Hamilton Code of Conduct and the Hamilton Supplier Code of Conduct. These guidelines clearly define the behavior we expect in the business environment.

Hamilton Medical requires its suppliers to strictly adhere to all relevant laws, regulations, and standards as well as general integrity standards in the countries in which they operate.

In business conduct with Hamilton Medical we oblige all our suppliers to base their actions on generally applicable ethical values and principles and we require our suppliers to acknowledge and adhere to the principles embodied in our Supplier Code of Conduct and to ensure that their own suppliers will also comply with these principles. Our suppliers are also expressly required to inform us of any possible violations of applicable rights and laws or of our Supplier Code of Conduct. The Hamilton Supplier Code of Conduct comprises the following principles:

- **Ethics:** Suppliers are committed to fairness, professionalism, and respect in their business dealings.
- **Labor and human rights:** Suppliers undertake to guarantee the labor and human rights of employees and to treat them with dignity and respect.
- **Health, safety, and environmental protection:** Suppliers undertake to ensure a safe and healthy working environment, to act in an environmentally friendly and resource-saving manner, to conserve natural resources in procurement and to minimize the use of hazardous materials.
- **Governance:** Suppliers undertake to comply with and continuously improve compliance with the principles and values contained in the Supplier Code of Conduct.

Due Diligence Processes for Labor and Human Rights

At Hamilton Medical we understand that we may cause or contribute to risks for human rights, including risks of Modern Slavery, in our own operations or by purchasing goods and services from third parties. We continue to focus on labour and human rights within our global operations, including reviewing the suppliers that we work with and ensuring that their ethics and approach to labour and human rights including Modern Slavery are integrated into our framework agreements with them. We

continue our due diligence process of our supply chain and, where appropriate, request information from existing suppliers regarding their businesses, their position on the Modern Slavery Act 2015 and how they intend to eliminate risks to labour and human rights within their business and their own supply chains.

Assessment of Modern Slavery Risk

Our management approach is based on the Hamilton Supplier Code of Conduct, which obliges our suppliers to uphold internationally recognized labor and human rights. We conduct systematic risk assessments using a “Supplier Management Risk Index” that maps country-specific risks. Based on this index, we formulate specific compliance requirements for specific suppliers.

Suppliers that operate from or provide products from high-risk countries are required to undertake to fully comply with our Supplier Code of Conduct. If they fail to comply, we reserve the right to take appropriate action, which may, as a last resort, mean to exclude these suppliers from our portfolio.

In order to ensure traceability in the relevant risk areas in the long term, we are continuously working to integrate the relevant data from our procurement into our system. The information collected and documented by our procurement department is supplemented and updated on an ongoing basis. The aim of this is to systematically improve the database for traceability in our supply chains.

Our Supplier Code of Conduct also obliges suppliers to actively support us in our due diligence processes if necessary and to ensure the necessary transparency with regard to potential human rights risks.

Since the end of 2023, Hamilton Medical has had a structured reporting system in place that gives all individuals the opportunity to report actual or suspected misconduct, including actual or potential violations of human rights, which includes cases of Modern Slavery.

Concerns can be submitted by any person, either anonymously or in the reporter’s name, via Hamilton’s whistleblower reporting system (<https://hamilton.integrityline.io/>). All information reported is checked carefully and investigated. When assessing Modern Slavery risks on the basis of a report, we involve external service providers where necessary. Relevant findings are forwarded to the Executive Board in an appropriate manner.

No reports or complaints relating to Modern Slavery have been received since the reporting system was introduced at the end of 2023.

Training

All employees at Hamilton Medical are trained on the Hamilton Code of Conduct which covers topics such as labour and human rights, ethics and integrity.

Further Steps Taken by Hamilton Medical to Prevent Modern Slavery in Our Supply Chain

As a signatory to the UN Global Compact, we are committed to integrating the universal principles in the areas of human rights, labor standards, the environment, and anti-corruption into our corporate strategy, corporate culture, and daily business processes, and to report on the results achieved each year.

Looking ahead, it is essential for us to continuously develop and expand our human rights requirements and guidelines in order to meet the highest standards.

To better identify and minimize risks related to human rights violations, including modern slavery, we are currently examining how we can raise awareness of these issues among our employees through targeted training and development measures. Appropriate training programs are currently being developed and rolled out across the company.

Hamilton Medical will continue to review its policies and processes, further raise awareness of this important issue, and evaluate measures to combat modern slavery within the company and along its supply chain. We remain committed to maintaining effective safeguards against any form of exploitation or abuse of people in our business operations and supply chain.

For and on behalf of Hamilton Medical AG

Bonaduz in July 2025

Bob Hamilton
CEO Hamilton Medical AG