



## **Report Under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act**

For the Year Ended December 31, 2023.

This report (the "Report") for the year ended December 31, 2023, is prepared in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") and is made on behalf of Boston Scientific Corporation ("BSC"), Boston Scientific Limited ("BSL") and Baylis Medical Company Inc. ("Baylis", collectively, "Boston Scientific", "us", "we" or "our"). BSL and Baylis are Canadian wholly owned subsidiaries of BSC, with headquarters in Marlborough, Massachusetts.

The Act requires us to state actions we took to prevent and reduce the risk of forced labour or child labour with our operations and supply chain. This report incorporates by reference the 2023 UK Modern Slavery Statement ("**2023 Modern Slavery Statement**") already published by Boston Scientific Corporation, which is appended below (Annex A).

### ***Structure, activities and supply chain.***

Boston Scientific is dedicated to transforming lives through innovative medical solutions that improve the health of patients around the world. We are a worldwide developer, manufacturer and marketer of medical devices that are used in a broad range of medical specialties. These products are generally sold directly or through distributors and agents to hospitals or physicians, making Boston Scientific the final step in the

supply chain prior to these products reaching the end customer. Additional details about the operations of the Entities (as defined in the Act) in Canada follows below:

- BSL is engaged in the import and distribution of medical devices in Canada, in the fields of Endoscopy, Urology, Neuromodulation, Cardiology (including Interventional Cardiology Therapies, Watchman, Cardiac Rhythm Management, and Electrophysiology), and Peripheral Interventions. BSL currently employs 241 people in Canada and is headquartered in Brampton, Ontario. BSL's supply chain primarily reflects procurement of medical devices (finished goods) from affiliated entities within Boston Scientific's group.
- Baylis was acquired by BSC in February 2022. Baylis operates in the fields of Cardiology and Electrophysiology, primarily researching, designing, and manufacturing medical devices to enable transeptal access to the left side of the heart, with such products manufactured by Baylis in Canada and at an affiliated Boston Scientific's manufacturing site in Costa Rica. Baylis previously sold its medical devices directly to health care providers in Canada, United States of America, France, Germany, and the UK and through channel partners to Japan and other parts of the world, though in February 2023, the sale of Baylis's products transitioned to Boston Scientific's global distribution network of direct sales subsidiaries and channel partners. Baylis employs around 708 people and is headquartered in Mississauga, Ontario.

Baylis' supply chain includes the procurement of metals, electronics, plastics, resins, chemicals, packaging and finished medical goods from component and sub-component manufacturers and distributors. Baylis is in the process of

integrating its operations and procurement activities with the broader Boston Scientific group. Therefore, in 2023, Baylis continued to procure some goods and services based on its previously existing procedures while continuing to integrate its supply chain into Boston Scientific's. Baylis expects its operations to be fully integrated within Boston Scientific's global supply chain by the end of 2025.

***Policies, due diligence processes, risk assessment, training, and assessing effectiveness.***

Our regional operations in Canada are structured to align with Boston Scientific's global ethics and compliance policies. We procure goods and services in alignment with Boston Scientific's global supply chain framework, which includes our Supplier Code of Conduct, supplier risk assessment, audits, due diligence procedures and employee training.

See the attached **2023 Modern Slavery Statement** (included in Annex A) for detailed information regarding our global policies, due diligence, risk assessment process for suppliers, employee training, and how we assess our effectiveness in relation to the risk of forced and child labour in our supply chains.

***Remediation***

In 2023, we have not identified any forced or child labour in our activities or supply chains. Therefore, no measures were taken to remediate any instances of forced or child labour, and there has been no resulting loss of income to the most vulnerable families.

**APPROVAL AND ATTESTATION**

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, by the board of directors of Boston Scientific Corporation.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind **Boston Scientific Corporation**.



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Full name: Vance R. Brown  
Title: Senior Vice President, General Counsel and Corporate Secretary  
Date: May 9, 2024

I have the authority to bind **Boston Scientific Limited**.



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Full name: Kenneth Spears  
Title: Director  
Date:

I have the authority to bind **Baylis Medical Company Inc.**



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Full name: Laura Conquergood  
Title: Vice President  
Date:

## “Annex A” U.K. Modern Slavery Act Statement

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### **For the Year Ended December 31, 2023**

This statement (the “Statement”) of Boston Scientific Corporation for the year ended December 31, 2023 is prepared in accordance with the United Kingdom Modern Slavery Act 2015 (the “Act”) and is made on behalf of the group companies listed below which met the reporting criteria of the Act during 2023\*.

The Act requires us to set forth the steps taken to ensure modern slavery, as such term is defined in the Act, is not taking place in our business or supply chains. Generally, modern slavery is defined as offenses of slavery, servitude and forced or compulsory labour and human trafficking. When used in this Statement, the terms “we,” “us,” “our,” “Boston Scientific,” “BSC” and “the Company” mean Boston Scientific Corporation and its divisions and subsidiaries in the UK.

Information on or connected to our website (or the website of any third party) referenced in this Statement is in addition to and not a part of or incorporated by reference into this Statement. Such additional information speaks as of the date thereof and is not intended to be confirmed or updated by reference herein. Boston Scientific disclaims any liability or responsibility for or endorsement of the information on or connected to the website of a third party.

### **Company Overview**

Boston Scientific is dedicated to transforming lives through innovative medical solutions that improve the health of patients around the world. We are a global developer, manufacturer and marketer of medical devices that are used in a broad range of interventional medical specialties. Our Global Supply Chain team supports more than 20 key locations around the world with our principal manufacturing facilities and distribution centres<sup>1</sup> located in countries where the prevalence of modern slavery is categorized as low/low-medium risk by Global Slavery Index<sup>2</sup>.

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<sup>1</sup>Malaysia, Brazil, Israel, United States of America (including Puerto Rico), Costa Rica, United Kingdom, The Netherlands, Canada, Japan and Ireland.

<sup>2</sup>Global Slavery Index is generated through the work of Walk Free, an international human rights group working to accelerate the end of all forms of modern slavery. The Global Slavery Index, the world's most comprehensive data set on modern slavery.

Our products are generally sold directly or through distributors and agents to hospitals or physicians, making Boston Scientific the final step in the supply chain prior to these products reaching the end customer. During 2023, our products were offered for sale by five core businesses:

- **Endoscopy:** Our Endoscopy business develops and manufactures devices to treat a broad range of gastrointestinal and pulmonary conditions with innovative, less invasive technologies.
- **Urology:** Our Urology business develops and manufactures devices to treat various urological conditions for both male and female anatomies, including kidney stones, benign prostatic hyperplasia, prostate cancer, erectile dysfunction and incontinence.
- **Neuromodulation:** Our neuromodulation business develops and manufactures devices to treat various neurological movement disorders and manage chronic pain.
- **Peripheral Interventions (PI):** Our PI business develops and manufactures products to diagnose and treat peripheral arterial and venous diseases, as well as products to diagnose treat and ease various forms of cancer.
- **Cardiology:**
  - **Interventional Cardiology Therapies (ICTx):** Our ICTx business develops and manufactures technologies for diagnosing and treating coronary artery disease and aortic valve conditions.
  - **Watchman:** Our WATCHMAN FLX™ Left Atrial Appendage Closure (LAAC) Devices are designed to close the left atrial appendage in patients with non-valvular atrial fibrillation who are at risk for ischemic stroke.
  - **Cardiac Rhythm Management (CRM):** Our CRM business develops and manufactures a variety of implantable devices that monitor the heart and deliver electricity to treat cardiac abnormalities.

**Electrophysiology (EP):** Our EP business develops and manufactures less-invasive medical technologies used in the diagnosis and treatment of rate and rhythm disorders of the heart, including a broad portfolio of therapeutic and diagnostic catheters and a variety of equipment used in the Electrophysiology lab.

Whilst the Boston Scientific product portfolio is broad in scope, Boston Scientific does not import into the UK any of the top ten high-risk products for modern slavery and human trafficking for use in our final products.<sup>3</sup>

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<sup>3</sup> Walk Free Global Slavery Index 2023 Report pg. 4 and 94

## **Boston Scientific Employee Compliance and Ethics**

We are committed to act ethically and with integrity in all our working relationships, inside and outside the company and in compliance with all applicable laws. We support this commitment through our robust global compliance program. People and partners across our brands and supply chain trust our ethics and our track record of responsibility.

The Boston Scientific Global Compliance team provides employee training and resources for conducting business responsibly, treating customers and suppliers fairly and reporting any ethics concerns. The team is led by our chief compliance officer, who reports to the full Board of Directors annually, the Risk Committee quarterly and to the Audit Committee as warranted. Our compliance experts collaborate with teams across the business to monitor the company's compliance with Boston Scientific policies and applicable laws. In 2023, we allocated additional data analytics resources to strengthen the effectiveness of our Global Compliance team.

Every Boston Scientific employee is required to read, understand and follow the Boston Scientific Code of Conduct, the foundation for all of our business practices and relationships. Annual Code of Conduct training is mandatory for all employees and available in 19 languages. We regularly refresh training content based on updates to company policies, processes and compliance-related risks.

Our Advice Line allows anyone to confidentially ask a question and/or report a concern related to compliance, ethics and/or integrity at Boston Scientific. It is operated by a third-party vendor and available 24 hours a day, seven days a week in 61 languages. Information about Boston Scientific's Advice Line is communicated to employees as part of on-boarding and reinforced through annual Code of Conduct refresh training and global Integrity Week campaigns plus other compliance campaigns, such as encouraging Managers to have an "Open Door" to ensure employees feel comfortable raising questions and concerns. In 2023, 80% of concerns reported were made directly by an employee to a resource designated in the Code of Conduct (e.g., Compliance, HR, Manager, etc.), highlighting the success of the "Open Door" initiative.

Further, Boston Scientific has a strict non-retaliation policy whether direct or indirect, against an individual who raises a concern in good faith. This protection extends to anyone who assists with, or cooperates in, an investigation of such a report.

## **Boston Scientific Supply Chain**

We are committed to conducting business with suppliers who adhere to the highest ethical standards and comply with laws and regulations applicable to their business, including laws related to human trafficking and slavery. We work to advance principles of human rights as recognized and understood by the international community, which include freely chosen employment, avoidance of child labour, reasonable working hours, fair wages and benefits, and humane treatment. Due to the technical complexity of many of our products, our supply chain requires skilled full-time workers, reducing the risk of modern slavery in our business. Despite this we remain vigilant throughout our supply chain to identify and eliminate modern slavery risk. Boston Scientific has developed data analytic capabilities to map third party manufacturers throughout our supply chain to further assess the risk of modern slavery. In 2023, we expanded our use of artificial intelligence to assess risks throughout our value chain.

Prior to engagement of a supplier, we evaluate the supplier through a risk-based assessment, which may include supplier questionnaires and audits of supplier facilities. Our expectations for compliance with ethical and quality standards are communicated to each potential supplier ahead of any engagement. Our Supplier Code of Conduct sets forth Boston Scientific's expectations for its suppliers regarding corporate responsibility in the supply chain and provides information and guidance on how to conduct business with ethics and integrity.

Evaluating potential partnerships against our strict criteria takes time, but partnerships with responsible suppliers are a fundamental component of our commitment to human rights and environmentally sustainable practices, as well as to our business continuity and risk mitigation strategies. Potential suppliers are evaluated based on their commitment to responsible business practices, sustainability, and social responsibility, among other areas. This includes a review of the supplier's corporate principles, core values, and code of conduct policies to assess commitment and adherence to responsible business practices, including upholding human rights and vigilance against human trafficking and slavery.

We have strong engagement with our suppliers through supply agreements, quality agreements and/or purchase order terms and conditions. These contracts include agreement to comply with all laws and regulations applicable to the supply of the service or material in all relevant jurisdictions. Our Supplier Quality team is responsible for ensuring that our vendors understand what is required to meet Boston Scientific's quality standards.

We monitor our supplier performance through desktop and on-site audits, while continually monitoring incoming material key performance indicators to confirm




compliance with performance and quality standards. Additionally, we have in place a Supplier Resiliency and Risk program which uses internal systems as well as a third-party platform to monitor risk. This system alerts us to supply issues throughout our supply chain based on publicly available information, including those presenting risks related to corporate responsibility.

Boston Scientific provides internal training on supply chain risks to over 850 global sourcing employees who manage these risks and continues to develop its training programme to meet business needs.

As noted above, we maintain an [Advice Line](#) whereby employees and third parties, including suppliers, may ask questions, obtain guidance, or report concerns. Employees and business partners are encouraged to raise questions when they need guidance or clarification and to report any concerns or suspected violations of the Code of Conduct, other Company policies, procedures and/or applicable laws.

**This Statement has been approved by the Board of Directors of Boston Scientific Corporation on 9 May 2024.**



**Michael Mahoney**  
Chairman and CEO  
Boston Scientific Corporation



**Vance R. Brown**  
Director of all the above-listed UK entities

*\*This statement is made on behalf of the following group entities in the UK: Boston Scientific Limited, BTG Limited, and BTG International Limited.*

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