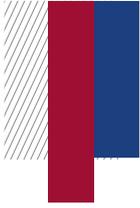


MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT





About this report – Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report is produced by Corcym UK (Holding) Ltd. and its subsidiaries (individually or collectively “Corcym”) for the financial year starting from January 1, 2023 to December 31, 2023 (the “Reporting Period”) and outlines the measures implemented to mitigate and minimize the likelihood of utilizing forced labor or child labor during the manufacturing process of goods, whether in Canada or abroad, as well as goods imported into Canada by the Corporation.

Corcym supports the principles of the California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015 and is thoroughly dedicated to eradicating human trafficking and slavery from its supply chain and business operation.

This report constitutes the first report prepared by the Corporation pursuant to Canada’s recent “Fighting Against Forced Labour and Child Labour in Supply Chains Act” (the “Act”).

Corcym corporate structure and supply chains

Corcym is an independent, global medical-device company focused on the structural heart area and dedicated to supporting cardiac surgeons with the best solutions for anatomical heart disease, with a heritage spanning more than fifty years.

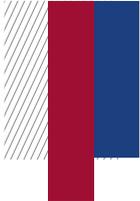
Our group has a broad portfolio of FDA/EU-approved, patented products for structural heart diseases, including Perceval®, a best-in-class surgical heart valve, that simplifies surgical implantation to deliver faster patient recovery. Corcym has two FDA and EU certified production and R&D plants in Italy and Canada and employs c.900 people worldwide.

Corcym Canada Corp., our legal entity in Canada, incorporates the second manufacturing site after the principal one in Saluggia, Italy: besides these manufacturing locations, strategic subsidiary’s locations are in the United States, United Kingdom, France, Germany, the Netherlands, Luxembourg, Belgium, Switzerland, as well as in China, Japan, Australia and New Zealand.

Our primary suppliers include raw material, component and service providers for our manufactured products. In addition, we utilize suppliers of IT and communications equipment and services; real estate and related services such as office cleaning and other facilities management services; food and beverages services, transport such as couriers; marketing such as merchandise suppliers and conference providers; office equipment and supplies; and professional services such as auditors, accountants, consultants, legal counsels, banks, insurers, recruitment agencies, education and training service providers and medical services providers.

Most of the components and systems used in our healthcare products are provided by suppliers with which Corcym has long-term contracts. Corcym seeks long-term relationships with major direct and indirect suppliers for the delivery of materials and components to build and deliver healthcare devices and support customers with related services.

Within its supply chain, Corcym has built relationships with suppliers worldwide in production, indirect goods and services.



Measures to prevent and decrease forced and child labour risks

Corcym considers the respect of human rights a fundamental corporate responsibility and a value governing all our activities and business.

We prioritize the utmost significance of upholding human rights in all our business operations across the globe and we expect the same of our business partners.

Corcym is constantly striving to further enhance our policies and practices as part of our endeavor to detect and mitigate risks related to modern slavery. We have already implemented the actions detailed further in this statement and are continuously working to improve our policies and practices.

Our procurement process at Corcym revolves around selecting suppliers who align with our steadfast commitment and dedication to upholding exceptional quality. We also have robust safeguards in place to ensure that modern slavery has no place within our internal business processes.

Policies, Governance and Due Diligence procedures

Corcym modern slavery and human rights statement restates our stance against using forced or child labor: we anticipate that every employee, regardless of level, and our business partners will act in a way that upholds this commitment. Our “Human Rights Statement” can be found on our website at this link: <https://www.corcym.com/ethics>

The purpose of this statement is to outline Corcym’s commitment and actions in support of international efforts to uphold human rights and against modern slavery and child labor.

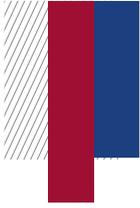
Our organization is unwavering in our commitment to fostering a safe and healthy work environment, valuing diversity as an integral part of our business philosophy. We have a zero-tolerance policy towards forced labor, child labor, and discrimination. We actively promote freedom of association and collective bargaining, and we strictly adhere to all applicable laws pertaining to wages, working hours, overtime, and benefits.

Corcym Code of Ethics

The Corcym Code of Ethics (the “Code”) applies to all Corcym community members, including the Board of Directors, management, and staff members at all levels, across all Corcym legal entities and countries.

It covers corporate procedures, connections with external stakeholders, and ethical behavior in the workplace. Corcym's conviction that honesty and integrity promote a positive work environment that increases the confidence of all stakeholders is reflected in the principles outlined in the Code.

The Code outlines the expectations for behavior in daily activities and interpersonal interactions for all those to whom it applies. It also describes the main duties of Corcym leaders, which include setting an example of high ethical standards and fostering an atmosphere at work that upholds the



letter and the spirit of the Code. In all of our international endeavors, we are obligated by our Code to support and be inspired by the UNGC's ten principles, our basic values, and our standards of behavior.

All members of the Board of Directors, all management, and all employees are always subject to the Code, without exception. Our Code can be found at this link: <https://www.corcym.com/ethics>.

Corcym Accredited Suppliers

Corcym is committed to its suppliers and strives to ensure that they align with our vision.

To achieve this, we have recently introduced a formal accreditation process that requires suppliers to provide detailed information about their economic and social structure.

Additionally, we request various data related to our expectations regarding human rights, ethics, governance, legal compliance, health and safety, environmental responsibility, and anti-corruption measures.

This accreditation process is mandatory for all our core suppliers, and it allows us to assess their suitability and ensure that they meet our standards.

In our continuous efforts to enhance operational efficiency, we consistently strengthen our protocols to mitigate the risks associated with child and forced labor. Prior to engaging with new suppliers, our supply chain team follows a meticulous risk assessment procedure and conducts evaluations using their operational risk framework.

Overall, our commitment to enhancing operational efficiency goes hand in hand with our dedication to eradicating child and forced labor from our supply chain. Through our rigorous risk assessment processes, supplier collaboration, monitoring and auditing systems, and transparent reporting, we strive to create a responsible and ethical supply chain that respects the rights and dignity of all workers.

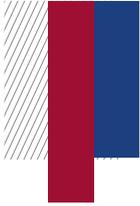
Corcym's Whistleblowing System

Reporting any suspicions of forced or child labor, as well as any possible violations of human rights is a fundamental obligation for all Corcym employees and suppliers.

Corcym has implemented diverse channels, such as the reporting "whistleblowing process", to facilitate the confidential and discreet reporting of any potential infractions or concerns, with a commitment to conducting thorough investigations into every allegation.

This procedure ensures that any concerns, as well as forced or child labor cases, can be addressed promptly and effectively analyzed.

The main reporting platform in our corporate structure is "**SpeakUp!**", a confidential and anonymous digital ethics line accessible and addressed to coworkers, supervisors, HR representatives, legal services representatives, internal audit representatives, suppliers or higher management. This platform encourages employees and business partners to report any suspected



misconduct, such as breaches of laws, regulations, our internal code of conduct, and corporate policies and procedures, in good faith. Our reporting platform is accessible at the following link: [SpeakUp](#).

Due Diligence Policy

As we strive to enhance operational efficiency, we continuously bolster our protocols to mitigate the hazards associated with child and forced labor. Prior to establishing partnerships with new suppliers, our supply chain organization diligently conducts a risk assessment process and evaluates them using their operational risk framework.

Corcym retains the right to examine suppliers to ensure they are adhering to its specified specifications: as a matter of fact, at Corcym, we scrutinize suppliers who have an impact on our quality system on a regular basis to make sure the goods or services meet the standards.

Corcym conducts specific audits, as do qualified outside parties that are hired especially for this reason.

Identifying and managing forced labour and child labour risks

Our group uses a risk-based approach to assess and manage its risk of forced labour and child labour.

To enhance the efficiency of this process, we have established a valid compliance framework to effectively manage and assess the risk of non-compliance in both our internal operations and external supply chain. This framework encompasses the identification and mitigation of modern slavery risks and obviously deters incidents of child labor or slavery, ensuring that we uphold our commitment to ethical conduct.

Corcym compliance framework operates on a cycle of continuous improvement. We utilize risk assessment criteria to consistently evaluate and categorize the risk level associated with our operations and suppliers: this enables us to prioritize our efforts and allocate resources accordingly.

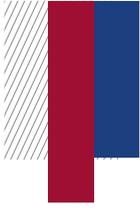
In addition, we regularly review and refine our policies and procedures to ensure they align with our values and reflect our dedication to ethical business practices and compliance. This includes a strong emphasis on human rights and modern slavery compliance, as we are deeply committed to upholding these principles and continuously expanding our focus in this area.

Remedial and corrective measures implemented

At Corcym, we prioritize the well-being and integrity of our employees and suppliers.

We extend the opportunity to individuals to report any ethical or legal violations, as well as any other concerns they may have, through our Code.

In the unfortunate event that non-compliance is discovered, Corcym is fully committed to taking immediate action by developing and implementing a comprehensive corrective plan, designed to not only resolve the issue at hand, but also to improve our policies and procedures to prevent similar incidents in the future.



We believe in transparency and accountability, and we work diligently to address and rectify any ethical or legal violations that may arise.

Training program and process

Training on the “Code of Conduct and Ethics” is and will be provided to Corcym employees annually: this training includes ethical decision-making, an overview of the applicable laws and regulations, and the process for reporting potential compliance concerns.

Corcym’s compliance program also includes written policies and procedures, monitoring, auditing, and the investigation into potential violations with the potential for disciplinary action to be taken when necessary.

In 2024, specific and tailored online training on the main principles of the Modern Slavery international regulations will be provided to Corcym employees who are directly involved with sourcing and purchasing activities.

In addition, targeted training sessions will be conducted for groups of employees who are involved in overseeing and interacting with our supply chains, with a specific focus on the risks associated with forced labor and child labor.

The purpose of these trainings will be to provide to targeted audiences an increased awareness of child and forced labour, and identify risks and assess how we can further improve the program moving forward.

Assessing efficiency and effectiveness at Corcym

Respect for human rights is one of the Corcym’s fundamental values. By means of our deeds and policies, we have executed and will implement several procedures aimed at preventing and mitigating the possibility of using child labor or forced labor in our supply chains and operations, as well as to be committed to maintain a work environment which promotes and protects fundamental human rights.

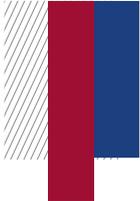
In our interactions with our employees, suppliers, and other business partners, we adhere to internationally recognized standards of business and human rights, ensuring that we consistently meet the highest benchmarks.

Corcym's plans to evaluate the efficacy of these steps to determine how well it has prevented and reduced the hazards of child and forced labor in its operations and supply chains.

Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Corcym UK (Holding) Limited.

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 Corcym UK (Holding) Ltd.

Christian P. Mazzi

CEO Corcym Group

Date: 29 May 2024