

## **Joint Statement on Fighting Against Forced Labour and Child Labour in Supply Chains**

### **Overview**

This Joint Statement sets out the actions that Sotera Health Company (a publicly traded company listed on the NASDAQ stock exchange in the United States and its direct and indirect subsidiaries, collectively referred to as “we,” “us,” “our,” and “Sotera Health”) has taken to prevent and to reduce slavery, human trafficking, and all forms of forced labour in its supply chain, for the reporting period from January 1, 2023 to December 31, 2023.

Certain jurisdictions have implemented legislation that requires qualifying business entities to provide public statements regarding processes in place to prevent and reduce slavery, human trafficking, and all forms of forced labour in their supply chains, including the Fighting Against Forced Labour and Child Labour in Supply Chains Act in Canada (the “Canadian Act”), the United Kingdom Modern Slavery Act of 2015 in the United Kingdom (the “UK Act”), and the California Transparency in Supply Chains Act of 2010 in California, USA (the “California Act”).

This Joint Statement is made by the following reporting entities pursuant to the Canadian Act, the UK Act, and the California Act, respectively: (i) Nordion (Canada) Inc. (business number 131962086RC0006, corporate number 11152505) (“Nordion”), located in Ottawa, Ontario, Canada, including on a consolidated reporting basis Nordion’s directly held wholly owned subsidiary, Sterigenics Radiation Technologies Canada, Inc. (BC 1260035), located in British Columbia, Canada) and Nordion’s direct parent company STR 2 B.V. (based in the Netherlands, corporate number 856060094B01), (ii) REVISS Services (UK) Limited (company number 03050679) located in the United Kingdom (“REVISS”), and (iii) Sotera Health.

### **Structure and Activities**

Sotera Health is a leading global provider of mission-critical sterilization, lab testing, and advisory services for the healthcare industry. Sotera Health goes to market primarily through its three global businesses, Sterigenics, Nordion, and Nelson Labs.

Sterigenics is a leading global provider of outsourced terminal sterilization and irradiation services. We offer a globally integrated platform for our customers in the medical device, pharmaceutical, food safety, and advanced applications markets with facilities strategically located to be convenient to our customers’ manufacturing sites or distribution hubs.

Nordion is a leading global provider of Cobalt-60 used in sterilization and irradiation processes for the medical device, pharmaceutical, food safety, and high-performance materials industries, as well as in the treatment of cancer. In addition, Nordion is a leading global provider of gamma irradiation systems, which are the units that house the Cobalt-60 sources within a gamma sterilization facility.

Nelson Labs is a global leader in outsourced microbiological and analytical chemistry testing services for the medical device and pharmaceutical industries. In addition to our laboratory testing

services, our customers often call upon our experts for technical assistance, regulatory consulting, and advisory services.

### **Supply Chains**

We import goods and manufacture products from parts, components, and raw materials purchased from third-party suppliers. Tier 1 suppliers are those third-party suppliers with whom we contract directly. Our suppliers are located domestically and internationally.

Nordion's products contain Cobalt-59 (naturally occurring and mined cobalt) sourced from our Tier 1 suppliers. The Cobalt-59, in turn, is sourced by such Tier 1 suppliers from their suppliers. Cobalt-59 is used by Nordion and Nordion's suppliers to produce radioactive Cobalt-60 for sale by Nordion in Canada and elsewhere. Amongst other customers, Nordion supplies Cobalt-60 to Sterigenics, and Nordion's related company, REVISS, which in turn sells Cobalt-60 in the UK and elsewhere.

### **Policies and Procedures**

Sotera Health opposes all forms of modern slavery, human trafficking, forced labour and/or child labour in its operations and its supply chain. Its supply chains include importing, producing, manufacturing, purchasing, processing, selling and distributing goods in Canada, the United Kingdom and elsewhere. We expect that our suppliers will act in accordance with Sotera Health's Code of Conduct and Supplier Code of Business Ethics and Conduct, each of which may be found at <https://investors.soterahealth.com/governance/governance-overview> (the "Code(s)").

The Codes form part of and are integrated into company-wide policies and procedures. Our commitment to upholding human rights comes with an expectation that all employees and suppliers act lawfully, ethically, and responsibly in their business practices and comply with applicable laws, including laws regarding slavery and human trafficking in the jurisdictions in which the suppliers do business. Consistent with our values, the Codes expect commitment to fair employment practices and employment laws in all operations, and an environment where all persons and employees are treated with respect and dignity.

Pursuant to the Codes, Sotera Health expects its Tier 1 suppliers will respect human rights. Human trafficking in any form is strictly prohibited by the Codes, as well as by the U.S. Government, the Canadian Government, the U.K. Government, and the European Union. Workers are free to terminate their employment with reasonable notice. Suppliers may not use forced, bonded, compulsory, indentured, or involuntary labor; procure commercial sex acts; deny access to identity or immigration documents; charge recruitment fees to employees; charge excessive "deposits" for tools, training, or personal protective equipment necessary for employees to carry out their jobs safely; use misleading or fraudulent recruitment practices; violate the labor laws of the country in which recruiting or the work takes place; provide housing that does not comply with the housing standards of the country in which the work occurs; or fail to provide required work documents.

Suppliers may not employ children below the local legal minimum working age. The employment of young workers who have reached the legal minimum working age, but who are below the age

of 18, must only occur in non-hazardous work. Suppliers may participate in legitimate workplace apprenticeship programs that comply with applicable laws and regulations. To ensure compliance, Tier 1 suppliers must keep a record of their employees' ages.

Sotera Health expects adherence to all applicable wage and hour laws and regulations and the upholding of fundamental human rights. We take steps to ensure that our goods are made, and materials sourced in a legal and ethical manner. The Codes expressly provide that suppliers may not use child, forced, bonded, compulsory, or involuntary labour, impose recruitment fees or violate labour laws, and our Tier 1 suppliers are requested to formally certify their compliance with the Codes.

Sotera Health's mission of "Safeguarding Global Health®" dovetails with the principles of human rights. In 2023, Sotera Health developed, and in early 2024 implemented, a Statement on Human Rights ("Human Rights Statement"), in which it has reaffirmed the application and endorsement of the Codes, and denounced human trafficking and slavery, with the goals of ensuring there is no child labour or forced labour applied at any step in our production of goods or services. The statement can be found at <https://investors.soterahealth.com/governance/governance-overview>.

Suppliers must promptly report to us any known breaches of the Codes. Action, as appropriate, will be taken against suppliers that violate this policy, including, but not limited to, possible termination of the supplier agreement. Tier 1 suppliers and their employees have a duty to report human trafficking violations using any appropriate disclosure channel, including but not limited to Sotera Health's Global Ethics Line. Employees and other parties are encouraged, without retribution, to report any violations of the Codes. Our Global Ethics line is available to anyone to report a concern about the business conduct of our suppliers or employees, 24 hours a day, 7 days a week, via a toll-free number or online. The Sotera Health Global Ethics Line has been designated as a grievance mechanism through which anyone can report concerns or ask questions about our supply chain. Reports may also be made online at <https://www.soterahealth.ethicspoint.com> or via telephone.

### **Steps Taken to Prevent and Reduce the Risks of Forced Labour and Child Labour**

When onboarding new Tier 1 suppliers and for continuous active monitoring of our existing Tier 1 supply chain, we use a third-party screening service as verification of product supply chains. The screening service monitors, for example, restricted lists including denied party lists, country embargoes, and sanctions.

We are currently assessing the expansion of our screening program. The framework for assessment includes the engagement of another third-party advisor to assist with assessment of the risks of forced and/or child labour in our supply chains. Nordion is applying a supplier risk-based approach, based on spend, commodity and geographical risk related to forced labour and child labour to identify Tier 1 suppliers to be included in the risk assessment.

Sotera Health provides its Tier 1 suppliers with its Supplier Code of Business Ethics and Conduct, and further requests that the Tier 1 suppliers certify their adherence to it. Currently, Sotera Health does not audit its Tier 1 suppliers' compliance with the Code.

## **Training**

Our annual compliance training program includes mandatory awareness training required of all employees (including supply chain) with respect to our Global Code of Conduct, which includes training on human trafficking, slavery, and supply chain risks, and more generally, references the Supplier Code of Business Ethics and Conduct. An online training system tracks our employees' completion of training, and each employee must annually certify and acknowledge their understanding of the Global Code of Conduct.

## **Remediation Measures**

Sotera Health has not been made aware of any forced labour or child labour in our business activities and supply chain and thus there have been no remediation measures.

## **Remediation of Loss of Income**

Sotera Health has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our business activities and supply chain and thus there have been no remediation measures accordingly.

## **Assessing Our Effectiveness**

In late 2023, arrangements were made with a third-party advisor to conduct in 2024, a good faith reasonable inquiry to assist with our supplier engagement and due diligence. The scope of inquiry is focused on Nordion's Tier 1 suppliers with which it has a significant business relationship and/or which operate in high-risk regions or industries with respect to child and/or forced labour. The current assessment also includes ongoing risk surveillance of various restricted/denied party screening lists and media platforms.

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act in Canada, and in particular section 11 thereof (and other referenced Acts), 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(s), for the reporting year listed above.*

***This Joint Statement was approved by the board of directors of STR 2 B.V. on the 28<sup>th</sup> day of May, 2024.***

***STR 2 B.V.***


Name: Eric Meyers  
Title: Director  
Date May 28, 2024

Signature:  (I have the authority to bind STR 2 B.V.)

***This Joint Statement was approved by the board of directors of Nordion (Canada) Inc. on the 28<sup>th</sup> day of May, 2024.***

***Nordion (Canada) Inc.***


Name: Don Lim  
Title: Director  
Date: May 28, 2024

Signature:  (I have the authority to bind Nordion (Canada) Inc.)

***This Joint Statement was approved by the board of directors of REVISS Services (UK) Limited on the 28th day of May, 2024.***

***REVISS Services (UK) Limited***

Name: Corby Nicholson  
Title: Director  
Date: May 28, 2024

Signature:  (I have the authority to bind REVISS Services (UK) Limited)

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