

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

### **Overview**

This Joint Statement on Fighting Against Forced Labour and Child Labour in Supply Chains (“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 undertaken to prevent and to reduce slavery, human trafficking, and all forms of forced labour and child labour in its supply chain, for the reporting period from January 1, 2024 to December 31, 2024.

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 and child labour in their supply chains, including the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Canadian Act”), the United Kingdom Modern Slavery Act of 2015 (United Kingdom) (the “UK Act”), and the California Transparency in Supply Chains Act of 2010 (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, (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**

In 2024, we continued to 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.

As previously reported, 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 in 2024, Nordion continued to supply Cobalt-60 to Sterigenics and REVISS, the latter of which in turn marketed Cobalt-60 in the UK and elsewhere.

## **Policies and Procedures**

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

The Codes form part of and are integrated into enterprise-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 and require commitment to fair employment practices and compliance with employment laws in all operations, in an environment where all persons and employees are treated with respect and dignity.

Consistent with the Codes, Sotera Health expects its Tier 1 suppliers to 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 commitment and mission of "Safeguarding Global Health®" is grounded in the principles of human rights, as affirmed in our Statement on Human Rights. This statement reinforces our support for international human rights standards and underscores our opposition to human trafficking and slavery, child labour and forced labour. 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 24/7 as a confidential channel through which employees, suppliers, or third parties may report concerns related to our supply chain or Code violations, either online or by phone: <https://www.soterahealth.ethicspoint.com>.

### **Steps Taken in 2024 to Prevent and Reduce the Risks of Forced Labour and Child Labour**

As part of our onboarding process for new Tier 1 suppliers and for our ongoing active monitoring of our existing Tier 1 supply chain partners, we continued to use a third-party screening service to verify supplier compliance. This service continuously monitors against restricted lists, including denied party lists, embargoed countries, and international sanctions. We also continue to engage a third-party advisor to assist our ongoing assessment of the risks of forced and child labour within our supply chains. Nordion's risk-based approach prioritized suppliers for monitoring, based on commodity type and geographic risk factors associated with forced labour and child labour.

Throughout 2024, we expanded our engagement with Tier 1 suppliers and enhanced the scope of our third-party risk monitoring activities. This broader and more robust monitoring has strengthened our visibility across the supply chain. As part of our ongoing due diligence, we are actively evaluating mitigation strategies where appropriate, consistent with our commitment to responsible sourcing and continuous improvement.

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. In 2024, Nordion continued to identify additional suppliers to provide written affirmation of their adherence to the Supplier Code of Business Ethics and Conduct. Currently, SoteraHealth does not audit its Tier 1 suppliers' compliance with the Code.

In early 2024, Nordion formally integrated requirements into its procurement contracting processes, mandating that all suppliers comply with applicable laws and regulations related to anti-slavery, forced labor, child labour and human trafficking laws. These contractual obligations reinforce our stance on human rights violations and reflect our ongoing commitment to ethical and responsible sourcing across our global supply chain.

## **Training**

Our annual compliance training program requires all employees to complete mandatory awareness training aligned with our Global Code of Conduct. This training includes content on human trafficking, slavery, and supply chain risks, and more broadly incorporates guidance from our Supplier Code of Business Ethics and Conduct. In 2024, we enhanced this program by launching a companywide, mandatory online training module, focused on identifying, preventing and addressing forced labor. Completion is tracked through our training platform, and each employee must annually certify their understanding of the Global Code of Conduct and our policies on modern slavery, child labour and human trafficking.

## **Remediation Measures and Loss of Income**

Sotera Health has not identified any remediation measures required by its business activities. 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**

Throughout 2024, we worked with our third-party advisor to review our due diligence process. The scope of the review was focused on certain Nordion Tier 1 suppliers with which Nordion has a significant business relationship and/or which operate in high-risk regions or industries with respect to child and/or forced labour. The assessment, as in the previous reporting year, also included 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 Nordion (Canada) Inc. on the 16<sup>th</sup> day of May, 2025.***

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

*Name: Riaz Bandali*

*Title: President and Director*

*Date: May 16, 2025*

*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 16th day of May, 2025.***

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

*Name: Corby Nicholson*

*Title: Director*

*Date: May 16, 2025*

*Signature:* 

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

***[Signature Page to Joint Statement on Fighting Against Forced Labour and Child Labour in Supply Chains]***