



umano**medical**

UMANO MEDICAL S-211 / MODERN SLAVERY ACT REPORT 2026

General Information

Entity name: Umano Medical Inc., including its Canadian, US and Australian operations

Report date: May 6, 2026

Reporting period: Fiscal year ended September 30, 2025

Report owner: France Lavalliere, Director of Procurement

Legal framework

This report is prepared in accordance with:

- Canada: Fighting Against Forced Labor and Child Labor in Supply Chains Act (S-211).
- Australia: Modern Slavery Act 2018 (Commonwealth).

Consultation (Australia specific)

The Australian operations were consulted during the preparation and validation of this report through management review and procurement leadership alignment.



Corporate Structure

Umano Medical Inc., a corporation incorporated under the **Canada Business Corporations Act** (R.S.C. 1985, c. C-44), is engaged in the design, manufacturing, and distribution of medical equipment. The company's head office is located in the Province of Quebec, Canada.

Approximately 500 employees work primarily across three manufacturing facilities located in Québec, as well as in the United States and Australia, where a small number of sales and after-sales service employees support U.S. and Australian customers.

Our Activities

Design and Development

Our engineers and designers develop proprietary (OEM) medical products in Canada.

Manufacturing

Our manufacturing facilities are in Canada. We work closely with material and component suppliers, primarily based in North America, to ensure the quality and safety of our products. We ensure that our employees benefit from fair and safe working conditions.

Distribution

We distribute our products to hospitals, clinics, and healthcare professionals in Canada and internationally.

Supply Chain

We are proud of our transparent supply chain and our commitment to combating **forced labour and child labour**. Many of our suppliers of goods and services are local partners who have supported us for many years. The raw materials we process

are sourced entirely from Canadian suppliers. Certain components may be sourced internationally.

We collaborate with local logistics partners to deliver our products throughout North America, and with international logistics partners for overseas shipments.

Policies and Processes

Umano Medical has implemented a **Responsible Procurement Policy** and a **Supplier Code of Conduct** that explicitly prohibit the use of forced labour and child labour. These requirements are integrated into supplier qualification, audit, and periodic reassessment processes.

As part of the supplier qualification process, the use of forced labour and child labour is directly addressed. Any affirmative response to this question results in the immediate disqualification of the supplier. At this stage, we conduct a risk analysis, including ethical risks, to identify potential supplier related risks as early as possible. This topic is also an integral part of our **on-site supplier qualification audits**.

We have incorporated an ethical assessment into our periodic supplier quality evaluations to identify potential risks of non-compliance, including the classification of non-conformities (minor or major) related to forced labour and child labour.

In addition, we conduct **on-site follow-up audits** during which we visit production facilities and interview employees regarding their working conditions.

In the event of an ethical non-compliance, a corrective action plan must be submitted by the supplier, approved, and implemented within a reasonable timeframe.



Umano Medical Program to prevent forced labor in its Supply Chain



Governance Tools and Program Implementation

We are proud of our commitment to responsible and ethical practices within our supply chain.

The primary tool supporting our forced labour and child labour prevention program is our Responsible Procurement Policy, which states that Umano Medical will not do business with suppliers or subcontractors who use forced labour or child labour, or who fail to provide decent working

conditions to their employees in accordance with local standards. Umano Medical requires its suppliers to impose the same standards throughout their own supply chains. Failure to comply may result in the termination of the business relationship.

We have also implemented a Supplier Code of Conduct, compliance with which is mandatory in order to be included on our approved supplier list. This Code explicitly prohibits forced labour and child labour. Each supplier must verify compliance within its own

supply chain and is subject to audit accordingly.

A mandatory training program of approximately four hours is provided to employees in Procurement and Human Resources. A condensed version of this training is provided to all employees upon hiring, with refresher training conducted every five years.

Our purchasing terms and conditions also reflect our position, and a specific contractual clause is now included upon the renewal of supplier contracts.

Our Employee Handbook formally commits Umano Medical to refraining from the use of forced labour and child labour in any of its operations. No employee is permitted to employ or

Risk Assessment and Mitigation

To date, no known incidents or substantiated cases of forced labor or child labor have been identified in our operations or supply chains. Consequently, no corrective measures have been required. We remain vigilant to maintain these high standards.

Umano Medical conducts a structured assessment of forced labour and child labour risks within its operations and supply chain. This assessment considers:

- the geographical location of suppliers,
- the nature of goods and services purchased,
- the criticality of components,
- supplier performance history and audit results.

The raw materials processed by Umano Medical are sourced from Canadian suppliers and are considered low risk. Certain internationally sourced components may originate from regions classified as presenting moderate risk. No supplier has been identified as presenting a high risk.

Suppliers located in regions assessed as moderate risk are subject to enhanced due diligence, including strengthened ethical audits and periodic monitoring.

engage child labour, and we ensure that all employees are hired voluntarily and freely. This policy applies to all employees, regardless of location or country of operation.

We actively promote awareness of forced labour and child labour risks within our organization and among our partners. Umano Medical is committed to promoting this policy across all sites globally.

To ensure compliance, we have implemented confidential reporting mechanisms that allow employees to report potential violations without fear of retaliation.

When a risk of ethical non-compliance is identified, Umano Medical requires the implementation of a documented corrective action plan, including appropriate remediation measures.

If a supplier is found to be using forced labour or child labour, Umano Medical reserves the right to suspend or terminate the business relationship. Where possible and appropriate, mitigating actions aimed at reducing negative impacts on affected workers, including the prevention of sudden income loss for vulnerable families, will be implemented in collaboration with the supplier.

Effectiveness and Continuous Improvement

Umano Medical's measures are recent and form part of a continuous improvement program. Their effectiveness will be evaluated using qualitative and quantitative indicators, including:

- the proportion of suppliers subject to ethical assessments,
- the proportion of suppliers audited on-site,
- the completion rate of mandatory training programs,
- the monitoring and handling of reports received through confidential reporting mechanisms.

This approach will enable Umano Medical to continuously refine its processes and progressively strengthen the effectiveness of its program

Effectiveness is assessed through KPIs including supplier audit coverage, ethical risk assessments completed, training completion rates, and corrective action closure.

These indicators will be reviewed annually to ensure continuous alignment with evolving regulatory expectations and best practices.

Commitment

We are building a sustainable procurement program that ensures regulatory compliance. Umano Medical is committed to maintaining a transparent and ethical supply chain and will continue to take measures to ensure that its products are manufactured without the use of forced labour or child labour.

Umano Medical commits to strengthening supplier traceability, increasing audit depth in moderate-risk regions, and enhancing employee training frequency.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, attest that I have reviewed the information contained in this report for Umano Medical Inc. To the best of my knowledge, and after exercising due diligence, confirm that the information contained in this report is true, accurate, and complete in all material respects for the purposes of the application of the Act for the reporting year indicated above.

This report was approved by the Board of Directors of Umano Medical Inc., being the governing body with authority to bind the entity

I have the authority to bind Umano Medical Inc.

Signature: 

Name: Robert Dion
Title: Co-president
Date: May 6, 2026

