Anti-Slavery and Human Trafficking Policy

SCHMITZ medical GmbH

1. Purpose

Modern slavery is a serious violation of human rights. It encompasses slavery, servitude, forced and compulsory labour, and human trafficking.

This policy sets out the principles by which we prevent modern slavery. It also serves as our policy statement on respect for human rights in our company and in our supply chains.

It is guided by the UK Modern Slavery Act 2015, the core labour standards of the International Labour Organization (ILO) and the UN Guiding Principles on Business and Human Rights.

2. Scope

This policy applies to SCHMITZ medical GmbH and its subsidiaries.

It applies to all persons working for us or on our behalf: management, employees, contractors, consultants and business partners.

3. Principle

We do not tolerate any form of modern slavery, either in our own company or in our supply chains.

We act ethically, with integrity and transparently in all business relationships.

For our employees in Germany, key protective rights are laid down by law, including in the German Criminal Code (Sections 232–233a StGB), the Young Persons Protection of Employment Act (JArbSchG), the Minimum Wage Act (MiLoG), the Working Hours Act (ArbZG), the General Equal Treatment Act (AGG) and the Residence Act (AufenthG). We comply with these requirements. In addition, the principles in Section 4 apply.

4. Principles for workers

The following principles apply to our own workers. We expect the same of our suppliers and business partners.

Principle	Description
Compliance with laws	We comply with applicable local and national laws, in particular regarding working conditions, pay and working hours.
Freely chosen employment	Workers may terminate their employment subject to the statutory, collectively agreed or contractual notice periods.
Freedom of movement	Workers' freedom of movement is not restricted.
Freedom of association	Workers have the right to organise and to represent their interests collectively, e.g. through trade unions and the works council.
No violence or intimidation	The threat or use of violence, harassment and intimidation are prohibited.
No recruitment fees	Workers do not pay any fees for their recruitment, either to us or to recruitment agencies engaged by us.

Principle	Description
Prohibition of child labour	Child labour is prohibited. We employ young people only within the framework of the Young Persons Protection of Employment Act, e.g. as apprentices.
No discrimination	No one is disadvantaged on the basis of personal characteristics.
No retention of documents	Workers' identity cards, passports or other original documents are not retained.
Access to remedy	Affected persons are given access to remedy (see Section 8).

5. Expectations of suppliers and business partners

We expect the same standards of our suppliers and business partners. They should also pass these standards on to their own suppliers.

We take this expectation into account when selecting, evaluating and reviewing our suppliers.

We make this policy available to our suppliers. We assess the risk of modern slavery on a risk-based approach, in particular according to country of origin and type of activity.

6. Responsibilities

Role	Responsibility
Management	Overall responsibility. Approves the policy and decides on measures in the event of violations.
Quality Management	Maintenance and regular review of the policy, monitoring of its implementation
Internal reporting office under HinSchG	Confidential receipt and handling of reports
Managers	Ensure that their staff are aware of and comply with the policy.
All employees	Compliance with the policy and reporting of suspected cases

7. Reporting suspected cases

Anyone who suspects a violation of this policy shall report it to their manager or to the internal reporting office under the German Whistleblower Protection Act (HinSchG).

The reporting office can be contacted at **hinweis@schmitz-medical.com**.

The reporting office is also open to employees of suppliers and other third parties.

This also applies if there is uncertainty as to whether a matter falls within the scope of this policy at all. Anyone who makes a report in good faith need not fear any disadvantage, even if the suspicion is not confirmed. We follow up on every report.

8. Handling of suspected cases and remediation

The reporting office acknowledges receipt of a report within seven days. The whistleblower receives feedback on the measures taken within three months at the latest.

The protection of affected persons is our priority. Where necessary, we involve the competent authorities and support affected persons in accessing support services and appropriate remedy.

If a suspected case is identified at a supplier, we do not automatically terminate the business relationship. If the supplier is not involved and cooperates in the investigation, it submits an action plan setting out the root causes, the gaps in its processes and the corrective actions. We monitor implementation. This expectation also applies to the supplier's own suppliers.

9. Communication and training

We inform our employees about this policy. It is accessible to all employees.

We train employees in purchasing and human resources on the risks of modern slavery.

10. Violations

Violations of this policy will have consequences. For suppliers and business partners, this may extend to termination of the business relationship, in particular if they are involved or do not cooperate in the investigation.

11. Review

We review this policy annually and amend it as necessary.

As part of the annual management review, the management considers the following key performance indicators: the number of reports, the proportion of suppliers evaluated and the number of employees trained.

Wickede (Ruhr), 09/11/2026

Matthias Schmitz, Managing Director