

# California Supply Chains Act Statement

Convatec Group Plc

13 May 2025

Convatec is committed to fair employment practices and to following applicable employment law wherever it has operations. This includes complying with laws that prohibit child or forced labour. Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Incidents of modern slavery can occur in any sector, industry, and geographic region.

Convatec has zero tolerance for any form of modern slavery in our operations and supply chain.

Our approach to protecting human and labour rights within our operations and supply chain includes the following. Additional information on approach can be found in our Modern Slavery Act Statement, available at [www.convatecgroup.com](http://www.convatecgroup.com).

## 1. Verification

To help protect against the risk of a third party acting unethically, our teams conduct a range of due diligence and related activities.

To ensure best in class human rights and labour practices throughout the supply chain, all of our suppliers are initially screened by a third-party platform, EcoVadis IQ. Suppliers identified as high risk of modern slavery are required to complete a Sedex self-assessment questionnaire (SAQ) at locations that manufacture Convatec products, provide raw materials or store our goods. Through the SAQ, suppliers with risks identified that have potential to conflict with our Code of Conduct are expected to complete a Sedex Members Ethical Trade Audit (SMETA). We operate processes that are designed to facilitate corrective actions after SMETAs, to ensure vendors are engaged promptly when a risk event occurs and that these events are tracked through to satisfactory closure of the potential risk. Our key suppliers are audited by a Sedex inherent risk assessment, with some also completing a voluntary audit.

To drive sustainability improvements through our supply chain, we also require our key suppliers to complete an EcoVadis assessment with the expectation that they score above our minimum accepted threshold. Key suppliers are defined through our supplier relationship management programme, these suppliers are our most important with high spend, strong levels of collaboration and are involved in driving innovation projects with Convatec. 94% of our key suppliers completed their EcoVadis assessment, with the average score across our key suppliers being 60. We aim to grow the average EcoVadis score of our key suppliers with the ambition for our key supplier to match our own silver rating. Any key supplier scoring below 'Committed' on their EcoVadis assessment by the end of 2025 will be required to complete a Sedex SMETA. Our process of reviewing scorecards and driving corrective actions through EcoVadis enables suppliers to improve their own sustainability performance. Further detail on the scoring can be [viewed here](#).

We require that new suppliers agree to adhere to our third-party compliance manual, or demonstrate adherence to the principles stated therein, which may derive from their own codes of conduct. We include an assessment of potential new suppliers' ability to participate in the EcoVadis assessment or Sedex process as part of our new sourcing process. This assessment is part of the Request for Information (RFI) and Request for Proposal (RFP) phases. In order to supply Convatec, all new suppliers must specify whether they have already been assessed by EcoVadis and Sedex, or are willing to do so. The new RFP process encourages all suppliers that we potentially do business with to assess their own sustainability performance, focussing on labour standards.

## 2. Audits

In accordance with the terms of our Manual, we are entitled to perform various types of audit assessments to verify the current state of supplier compliance and undertake routine monitoring

of the supplier's on-going compliance. If a supplier fails to comply with our Manual, we can either put in place a remediation plan or, in cases of severe non-compliance, refuse to pursue or terminate an existing relationship.

At the end of 2024, these processes did not reveal any issues that warrant an 'onsite' audit focused on trafficking and modern slavery to be conducted.

In 2024 we continued our work with Sedex to obtain additional information on suppliers identified as high risk of modern slavery by EcoVadis IQ. Based on their SAQ, those identified as having a potential conflict with our Code of Conduct, as well as suppliers who do not complete the SAQ within required timescales are expected to complete a Sedex Members Ethical Trade Audit (SMETA).

If suppliers refuse audits, or do not close non-compliances, Convatec completes a non-compliant supplier review form. This form is elevated for review by the VP of Supply Chain or VP Global Procurement, and Human Rights Committee and General Counsel for a final decision, including exit strategy if required. This process is detailed in our Sustainable Procurement Policy.

### 3. Certification

Like many medical device companies, in many countries our products are sold by third parties, such as distributors. We evaluate third party distributors prior to engagement (see above) and require that our distributors comply with all applicable laws and regulations and our Global Third Party Compliance Manual (Manual). We also require that the Manual is cascaded with any parties in their value chain that are involved in Convatec business. We also reserve the right to undertake audits of distributors to ensure compliance with the Manual.

Our Manual addresses issues of human rights and the prohibition of child labour, compulsory labour and human trafficking. Each third party that goes through our due diligence process will receive online Anti-Bribery and Anti-Corruption training that requires the third party to certify adherence to the Manual. All new suppliers, and existing suppliers when their contracts are renewed, are also required to comply with the Manual.

In 2024 we published our Sustainable Procurement Policy, which sets out the requirements that should be applied throughout the procurement lifecycle, from sourcing to supplier relationship management with respect to human rights and the environment. It lays out our expectations of suppliers and the remediation and governance process if issues are detected.

We require our direct material and contract manufacturing suppliers to comply with the laws of the country in which they operate. To help ensure our suppliers respect and enforce our standards regarding anti-slavery and human trafficking, our template supplier agreements contain contractual representations, warranties, and undertakings in relation to compliance with employment and working time laws and rights, freedom from discrimination and harassment, manufacture under appropriate conditions and absence of child labour.

Each third party that goes through our due diligence process receives online Anti-Bribery and Anti-Corruption training that requires the third party to certify adherence to the Manual. Our Manual addresses issues of human rights and the prohibition of child labour, compulsory labour and human trafficking.

### 4. Internal accountability

'Do what's right' and 'Own it' are two of our core values that represent who we are at Convatec. We recognise that we need to make sure that our business decisions at all levels embody these values and that we embed ethical behaviour in everything we do. By doing so, we earn trust, build stakeholder confidence and ensure that, at all times, we act with integrity and do what we say we will do. This is essential if we are to achieve our vision and create value for our stakeholders.

All colleagues are involved in ensuring that modern slavery is not tolerated. To ensure that awareness around detecting and preventing modern slavery remains high, Convatec maintains a

cross-functional Human Rights Committee that keeps our structures and processes current to global dynamics.

We implement a number of policies and codes which are relevant to slavery, people trafficking, and human rights and ethical behaviour more broadly. We publish these policies and codes on our website, and they can be [viewed here](#).

Our Human Rights and Labour Standards Policy (Policy), applies to our own operations and employees, specifically addresses the United Nations Universal Declaration on Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact. The Policy, which underpins the way we work with each other, with partners, and with customers and suppliers, was updated to include: explanation of our process for evaluating suppliers to ensure they align with our principles and practices; articulation of our approach to labour standards, including compliance with relevant laws and regulations in the countries in which we operate; and explanation of the Convatec Human Rights Committee and its role in monitoring implementation of the policy and leading any additional steps required. The Policy clearly states that "Convatec does not accept nor condone any form of modern slavery whether forced, compulsory or trafficked labour. Without limitation, Convatec does not engage sweatshop labour, convict labour or indentured labour under penal sanction."

The Policy is referenced in our Code of Ethics and Business Conduct (Code) which defines our core principles of ethical business practice and our standards for professional and personal behaviour. The Code includes sections on human rights, discrimination and harassment.

Every Convatec employee is required to report any actual or potential violation of either the Policy or the Code and communication channels are in place within the Group to facilitate and encourage such reporting, including an independently-managed confidential Compliance Helpline.

## 5. Training

Convatec requires mandatory training in relation to our Code for all new and existing employees (which also extends to all Board members) on an annual basis. This training is delivered through online training, via Townhall meetings and in virtual or face-to-face sessions. As part of our management induction process, new members of our management team participate in training in relation to our Policy.

To hold ourselves accountable to monitoring and tracking this requirement, in 2021, we set a target to ensure at least 95% of employees are trained on our Code annually. We achieved that target in 2024, with 98% completion.

We developed and launched a Global Human Rights e-learning module to all Convatec employees in 2023, and in 2024 set a target of at least 95% of employees trained annually. The interactive module guides all employees through important subjects such as human trafficking prevention, speaking up and environmental issues.