



Elekta Modern Slavery and Human Trafficking Statement FY 2018/2019

This is the Elekta Limited modern slavery and human trafficking statement for the financial year ending 30 April 2019, pursuant to section 54 of the Modern Slavery Act 2015. It has been approved by the board of directors.

Statement from MD Elekta Ltd:

"We are strongly committed to human rights and employees' rights and are supportive of the UK Government's objective to eradicate modern slavery and human trafficking and will play our part in the furtherance of this objective. We require the same from all our business partners, including suppliers and contractors. This statement describes the steps we have already taken and propose to take going forward to help ensure that modern slavery and human trafficking does not occur in our supply chain or business. We intend to build on our policy and processes in the coming years as we work to deliver on our commitment and implement the steps described below."

Our business, structure and supply chains

Elekta is a human care business pioneering significant innovation and clinical solutions for treating cancer and brain disorders. We develop state-of-the-art tools and treatment planning systems for radiation therapy including brachytherapy and radiosurgery, as well as workflow enhancing software systems across the spectrum of cancer care. Stretching the boundaries of science and technology, providing intelligent and resource-efficient solutions that offer confidence to both health care providers and patients, Elekta aims to improve, prolong and save patients' lives.

Elekta's solutions in oncology and neurosurgery are used by over 6,000 customers worldwide. Elekta employs about 3,900 employees spread globally across 29 countries. Elekta's manufacturing is located in China and in Europe. The corporate headquarters are located in Stockholm, Sweden, and the parent company, Elekta AB, is listed on NASDAQ Stockholm. Elekta limited is a wholly owned subsidiary of Elekta AB and is predominantly responsible for Elekta's Linac and MR-Linac portfolios, UK sales and services and management control of EMEA sales and services and the distributor network for the Linac/MR-Linac portfolios.

Elekta has a global base of more than 600 active suppliers to the Group's manufacturing processes. Measured by value, suppliers in Asia account for about 19 percent (the majority located in China) with suppliers in Europe contributing around 66 percent and North America the remaining 15 percent by value.

Further details on Elekta can be found at our website and in our annual report.

The parts of Elekta's supply chains where there is a risk of slavery and human trafficking taking place are predominantly in extraction of metals and minerals and in transportation. The manufacturing stage of our supply chain is also at risk.

As part of the Sustainable Sourcing Program we will aim at mapping our supply chain and identifying actors further upstream from our direct suppliers. Risks of slavery and human trafficking are more likely further upstream, and we therefore request our direct suppliers to in turn ask their suppliers to adhere to the same standards.

Our policy on modern slavery and human trafficking

Our commitment to human rights is set out in the Elekta Code of Conduct, which is applicable to everyone working for and on behalf of Elekta; employees, consultants, controlled companies as well as suppliers and business partners. The Code of Conduct is available at our website. The Code of Conduct prohibits any form of forced, compulsory or child labor and proclaims the right to fair wages including time to rest, overtime compensation and holidays.

In 2017 we implemented a new Sustainable Sourcing Program and developed a new Supplier Code of Conduct setting specific requirements on Elekta suppliers. The Supplier Code of Conduct (also available at our website) is based on internationally proclaimed human rights enshrined in the Bill of Human Rights, as well as fundamental rights at work and international labor standards enshrined in the ILO Core Conventions, including the prohibition of forced labor, modern slavery and human trafficking. All of our suppliers have committed to follow the Elekta Supplier Code of Conduct. Under the Supplier Code of Conduct all Elekta suppliers are requested to impose the same requirements for their suppliers.

We will ensure consistent messaging of these policies is distributed throughout our business and management at all levels, and our supply chains.

Due diligence process

As part of the Sustainable Sourcing Program, Elekta has implemented a robust due diligence program in order to identify and mitigate modern slavery and human trafficking risks in our business and in our supply chain.

The due diligence procedure is an ongoing, continuous process, with initial focus on direct material suppliers and moving forward also further upstream in the supply chain. Based on factors such as location in high-risk countries, internal and external risk assessments and materials sourced for the products, suppliers are being identified for on-site audits based on the requirements in the Supplier Code of Conduct. During FY 2018/19, all our direct strategic suppliers have taken the Onboarding Supplier Assessment Questionnaire (consisting of 90 questions) and have been risk categorized (as either low-, medium- or high risk) based on the indications from the questionnaire supplemented by the other risk factors mentioned above. At time of writing, a small number of suppliers have been flagged as high risk, and these are followed up with on-site audits. The suppliers with identified non-conformities from audits receives corrective action plans with time frames for follow up depending on the severity of the non-conformity. We will engage with suppliers and provide guidance when necessary to close potential non-conformities and improve results. Our approach is always cooperation and continuous improvement.

In order to effectively implement the Sustainable Sourcing Program throughout our organization and our supply chain, we have a dedicated team comprised of representatives from the following group functions:

- Compliance & Sustainability
- Procurement
- Legal
- Human Resources
- Supplier Quality Assurance

The Supplier Code of Conduct requires suppliers to make reliable determination of the origin and source of materials and minerals in products, parts and components procured by Elekta. A sub-activity of the Sustainable Sourcing Program will focus on addressing responsible sourcing of

conflict minerals (e.g. tin, tantalum, tungsten and gold) and cobalt. During 2018 / 19, Elekta made the significant step of becoming a member of the Responsible Minerals Initiative (RMI), working towards improving mineral supply chain traceability. In doing so, Elekta now have access to tools and resources, including the Responsible Minerals Assurance Process (RMAP) which Elekta can make use of during communications with the supplier, sourcing choices and contract development.

Training and whistleblowing

To ensure that our staff understand and can identify modern slavery and human trafficking risks in supply chain and business, we have developed and provided appropriate training for all procurement functions in all our regions.

Our staff is informed about the government's 24-hour modern slavery public telephone helpline (+44 (0)800 0121 700). In addition, Elekta's whistleblower tool, the Elekta Integrity Line, managed by an external service provider, can be used by employees for reporting of alleged violations of, or concern in connection with, the Code of Conduct that are conducted by Group or local management and relate to for example personal health and safety. Elekta Integrity Line is available 24/7, 365 days per year and enables persons to report via phone or email.

Managing Director, Elekta Limited

Date: 18th October 2019

Name: STEVEN WORT



