



## Elekta Modern Slavery and Human Trafficking Statement FY 2024/25

This is Elekta's modern slavery and human trafficking statement for the financial year ending 30 April 2025, pursuant to section 54 of the UK's Modern Slavery Act 2015 and to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9. This is a joint statement by Elekta Limited and Elekta, Ltd., that has been approved by the board of directors of Elekta Limited and by the Sole Shareholder of Elekta, Ltd.

Statement from Elekta:

*"We are strongly committed to human rights and employees' rights and we support international efforts, including those of the governments of the UK and Canada, to eradicate modern slavery and human trafficking. We 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 those we will take 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 as we work to continuously 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 more than 4,600 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, Ltd. also is a wholly owned subsidiary of Elekta AB. While Elekta, Ltd. does not manufacture products, it is responsible for sales of Elekta products and services and for providing services in Canada.

Elekta has a global base of over 900 suppliers to the Group's manufacturing processes. Supplier locations are in EMEA, APAC and the Americas.

Elekta's Procurement Function is responsible for ensuring supply chain implementation and compliance to our Supplier Code of Conduct. Elekta's revised Sustainable Sourcing Program is managed via standing agenda item on sustainable sourcing, in the regular Procurement Steering Group (PSG) meetings which includes Procurement Leaders from across Elekta's Business Lines.

Further details on Elekta's global operations can be found at our website and in our [annual report](#), which includes the annual sustainability report.

### Our policy on modern slavery and human trafficking

Our commitment to human rights is set out in the Elekta Code of Conduct, which applies to everyone working for and on behalf of Elekta: employees, consultants, controlled companies as well as suppliers and business partners. The [Code of Conduct](#), available at our website, prohibits any form of forced, compulsory or child labour and proclaims the right to fair wages, including time

to rest, overtime compensation and holidays. Our People & Human Rights policy reiterates that Elekta does not accept the use of forced labour, including debt bondage, trafficking and other forms of modern slavery or work performed under the threat of a penalty or coercion. The Elekta organizations in the UK and Canada have Human Resource professionals who oversee compliance with local labour laws and Elekta policies.

In addition, the Elekta Supplier Code of Conduct, places requirements on Elekta's suppliers concerning human rights and labour rights and the sourcing of conflict minerals. It is based on internationally established human rights enshrined in the International Bill of Human Rights, as well as fundamental rights at work and international labor standards enshrined in the Core Conventions of the International Labour Organisation, including the prohibition of forced labour, modern slavery and human trafficking. All Elekta direct suppliers must commit to adhere to the Elekta Supplier Code of Conduct and communicate these principles upstream to their suppliers. The full version of the [Elekta Supplier Code of Conduct](#) is available on our website.

### **Due diligence process**

We select suppliers through our Sourcing process that includes quantitative and qualitative assessment criteria that are governed by our Sourcing Board, commercial contracting and quality assurance processes.

A key part of our sustainability ambition is our Sustainable Sourcing Program (SSP), which is a due diligence and continuous improvement program aimed at building a win-win relationship with our suppliers to manage risk and drive value creation, while identifying opportunities for improvements in our supply chain. The program covers a range of sustainability requirements, and aims to identify and mitigate any non-conformances with Elekta's Supplier Code of Conduct.

Elekta categorizes procurement activities into either direct or indirect sourcing. In 2024/25 Elekta has adopted the D&B ESG Risk Assessment Tool for its suppliers. As per the related Elekta policy, we will do a review no less than annually and contact any suppliers with a very poor rating. None of the findings were classified as high risk. No supplier commercial contracts have been terminated based on these assessments, and we continue to engage with the suppliers to build collaboration across the supply chain.

### **Origin of materials**

The Supplier Code of Conduct requires suppliers to make reliable determinations of the origin and source of materials and minerals in products, parts and components procured by Elekta. The parts of Elekta's supply chains where there is potentially the most risk of slavery and human trafficking are in extraction of metals and minerals and in transportation. Such risks are more likely further upstream and in the manufacturing stage of our supply chain.

Our membership in the Responsible Minerals Initiative (RMI) provides us with tools and resources to further improve mineral supply chain traceability. In 2024/2025, all suppliers of products with tungsten used smelters validated by the Responsible Mining Initiative. All suppliers of cobalt have signed Elekta's Suppliers Code of Conduct or equivalent. Elekta is using minor quantities of tantalum, tin and gold.

### **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 procurement professionals. In the prior fiscal year, procurement employees attended ESG training sessions (legislation, human rights, supplier engagement for science-based targets), This fiscal year, we delivered science-based target initiatives training webinars to the majority of our top suppliers by emissions, with Elekta procurement managers in attendance.

Our staff is informed about the UK government's 24-hour modern slavery public telephone helpline (+44 (0)800 0121 700). In addition, Elekta's global whistleblower tool, the "Elekta Integrity Line", managed by an external service provider, can be used by anyone (internal or external of Elekta) to anonymously report any suspected violations of the law, or a concern in connection with the Elekta Code of Conduct. The Elekta Integrity Line is available 24/7, 365 days per year and enables persons to report via phone or email in all applicable languages.

We believe that the above-described efforts have been and remain effective in eliminating the use of child labour or human trafficking in Elekta's supply chain.

In accordance with the requirements of the applicable Act, and in particular section 11 of Canada's Act, I attest that I have reviewed the information contained in this report for the 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 applicable law, for the reporting year listed above. Further, I attest that I have authority to bind the Elekta legal entity listed above my signature.

SVP and Head of Business Line Linac Solutions, Elekta Limited

Date: May 21, 2025



Bridie Norman (May 21, 2025 12:51 GMT+2)

Name: Bridie Norman

President, Elekta Ltd. / Elekta Ltée

Date:



Name: Ardie Ermers