

**ZOLL Medical Corporation and ZOLL Medical UK Ltd.
Modern Slavery and Human Trafficking Statement**

Financial Year 1 April 2025 – 31 March 2026

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps ZOLL Medical Corporation (“ZMC”) and its subsidiary, ZOLL Medical UK Ltd. (“ZOLL UK”), have taken during the financial year ended 31 March 2026 to prevent modern slavery and human trafficking in our business operations and supply chains. ZMC and ZOLL UK together are referred to collectively herein as “ZOLL.”

At ZOLL, we are committed to upholding the highest standards of fairness, integrity, and transparency in all third-party engagements, including suppliers, consultants, distributors, contractors, healthcare professionals, and others. Our fair procurement practices ensure that every relationship is selected, evaluated, and managed ethically, in compliance with legal and regulatory standards. We expect our third party partners to implement their own internal controls, ensuring that both they and their respective third-party partners maintain similar standards of fairness, integrity, and transparency in all business practices.

ZOLL is committed to upholding human rights and fair labor practices. We strictly prohibit forced labor, child labor, and any form of unlawful discrimination, including discrimination based on race, color, religion, sex, gender identify, sexual orientation, national origin, disability, or any other protected characteristic. ZOLL adheres to applicable local labor laws and does not tolerate child or forced labor among our third-party partners. Our goal is to foster a positive, inclusive work environment that respects individual rights and is free from unlawful discrimination and harassment. As a third-party partner, we expect you to share this commitment by avoiding any practices that constitute modern slavery, including:

- Human trafficking
- Slavery
- Servitude (coercing individuals to work under threat or penalty)
- Forced labor
- Debt bondage (forcing individuals to work to repay debts under unfair conditions)
- Forced marriage
- Child labor

By upholding these values, we promote respect for human dignity and fairness in the workplace.

1. Our Business, Structure and Supply Chains

ZMC is a private corporation organized in Massachusetts, USA, and is part of the Asahi Kasei Group in Japan. ZOLL UK is a private limited company registered in England and Wales (Company No. 02823225) and a wholly owned subsidiary of ZMC.

- **ZOLL core activities:** marketing, distribution and technical support for medical devices (including defibrillators, ventilation and temperature-management systems) and related software solutions globally, including within the United Kingdom and Republic of Ireland. The volume of devices placed annually in the UK market is approximately 10,000.
- **Employees:** ZMC operates worldwide, with entities in Europe, ASIAPAC, LATAM and North America and has approximately 7,000 employees. ZOLL UK has approximately 142 employees (permanent and temporary), based in our Runcorn headquarters and field service roles across the UK.
- **Turnover:** ZOLL UK's turnover in fiscal year 2025-26 was approximately £42 million.
- **Supply chain:** ZMC serves as the manufacturer of ZOLL products. ZOLL UK is a sales, distribution and business arm for ZMC in the UK. ZMC's first-tier suppliers include OEM and contract manufacturers of components, parts and electronic assemblies. These suppliers are located in several countries, including the United States, EU, Malaysia, Thailand and China. Both ZMC and ZOLL UK utilize a variety of logistics partners, vendors, and professional service providers. ZOLL products are sold globally, either directly to end-customers or through distributors.

ZOLL conducts due diligence screening on our distributors to ensure that they are ethical and responsible business partners. As part of this effort, distributors are required to complete a questionnaire that evaluates their labor practices, recruitment methods, and overall exposure to human-trafficking risks. Following this assessment, distributors are reviewed through a compliance-monitoring platform that identifies potential problems, including entities with histories of forced labor, trafficking-related violations, unethical recruitment practices, or other indicators of exploitation. If a possible issue arises, a compliance team within ZMC conducts further research and evaluates how to proceed. ZMC intends to expand this due diligence screening program to suppliers of goods that are used in ZMC's manufacturing processes.

In parallel, ZMC has transitioned to a new cloud-based ERP system that embeds these safeguards directly into our daily operations. The system will automatically screen transactions in real time, helping ensure that no vendor, subcontractor, or intermediary involved in our supply chain is associated with trafficking, forced labor, or other prohibited practices. This integrated approach strengthens our ability to detect risks early, maintain compliance, and

uphold the highest ethical standards across our global supply chain. ZOLL UK will be brought under the new ERP system in due course.

Additionally, ZMC conducts an annual compliance review of all suppliers of parts and components for ZOLL products that are available for sale to the United States Government (which products are the same as those available for sale in the UK). Each such supplier is manually screened through the United States System for Award Management (SAM) database, which identifies entities that have been debarred, suspended, or excluded from U.S. Government contracting. While SAM covers a broad range of compliance issues, it also flags organizations with trafficking-related violations or fraudulent labor practices. Incorporating SAM into our annual review provides an added layer of assurance that none of our partners are implicated in trafficking-related activities.

Together, these measures reinforce our commitment to ethical sourcing, responsible stewardship, and the protection of vulnerable populations across all tiers of our supply chain.

2. Policies Relevant to Slavery and Human Trafficking

Policy	Scope	Latest revision
ZOLL Medical UK Anti-Slavery & Human Trafficking Policy (anti-slavery_and_-human_trafficking_policy--july-1-2026.ashx)	All ZOLL UK employees, customers, suppliers, and contractors	July 2026
ZOLL Medical Corporation Global Human Rights Statement (zoll-human-rights-policy-statement-5925.ashx)	All ZOLL employees, customers, suppliers, and contractors	May 2025
ZOLL Third Party Code of Ethics and Business Conduct (zoll_codeofconduct_3rd_042025.ashx)	All parties that do business with ZOLL	Jun 2025
Responsible Sourcing & Conflict Minerals Policy (conflict-minerals-statement-june-2025.ashx)	Hardware components and materials	Aug 2024
Ethics (Whistle-blower) Policy & Hotline (EthicsPoint - ZOLL Medical Corporation)	All workers and third parties	Apr 2023

All policies are available to employees via ZMC's intranet and to external stakeholders through <https://www.ZOLL.com>.

3. Due-Diligence Processes

1. **Supplier onboarding:** ZMC requires distributors to complete a due diligence questionnaire and ZMC runs the distributor through a third party compliance platform. ZMC will be rolling out a program to cover suppliers of goods and components used in ZOLL products, as well.
2. **Contractual controls:** All new distribution and supply contracts include language that prohibits the use of modern-slavery. They also include a requirement that the counterparty comply with all applicable laws, ZOLL's Third Party Code of Ethics and Business Conduct, and the Advamed Code of Ethics.
3. **Whistle-blower mechanisms:** ZMC and ZOLL UK have an Ethics Hotline available on the ZMC intranet and our website. Reports received through the hotline are investigated by a neutral external service provider.

4. Risk Assessment & Management

During FY 2025/26 we refreshed our risk analysis and identified the following elevated-risk areas:

- **Electronics component manufacturing** in Malaysia and mainland China (risk: forced labor, excessive overtime).
- **Raw-material smelting** for tin, tungsten, tantalum and gold (3TG) in certain conflict-affected regions.
- **Third-party logistics (warehouse handling)** in the UK (risk: temporary-labor exploitation).

Mitigation measures for each risk are embedded in our due-diligence program.

4. Measuring Effectiveness

<u>KPI</u>	<u>FY 2025/26 Result</u>	<u>FY 2025/26 Target</u>
Completion rate – Human Rights e-learning (employees)	98.5 %	≥ 99 %
Number of distributor due diligence audits conducted	Approx. 400	
Confirmed instances of modern slavery in our operations	0	0

Following the review of our business and supply chain this year, we have determined that ZMC, ZOLL UK and, to the best of our knowledge, our supply chain, do not make use of forced labour. We remain committed to improving our practices to combat modern slavery by enhancing our due diligence program to ensure that our supply chains are free from slavery and human trafficking.

5. Training and Capacity-Building

- Mandatory e-learning on human rights for all employees, offered in multiple languages and carried out annually.

6. Looking Ahead (FY 2026/27 Commitments)

- Continue to conduct due diligence screening on distributors and extend screening to supplier base.
- Remain informed about industry-wide guidance on responsible electronics sourcing

In order to assess and manage risk, in the upcoming year, we will continue to evaluate the efficacy of our processes and procedures. We will continue to use indicators to assess how effective we have been.

7. Approval and Signature

This statement was approved by the Board of Directors of ZOLL Medical UK Ltd. on 1st **July 2026** and is signed on its behalf by:

Richard Knell-Moore

Signature: _____

Title: Vice President, EMS & Hospital Sales - EMEA, ZOLL Medical UK Ltd.

Date: 9th July 2026

For further information regarding this statement, please contact the Compliance Team at ZOLL Medical UK Ltd., 9 Seymour Court, Tudor Road, Runcorn, WA7 1SY.