



Elekta Modern Slavery and Human Trafficking Statement FY 2019/2020

This is the Elekta Limited modern slavery and human trafficking statement for the financial year ending 30 April 2020, 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 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 4 000 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 nearly 500 suppliers to the Group's manufacturing processes. Measured by spend value, suppliers in Asia account for about 17 percent (the majority located in China) with suppliers in Europe contributing around 69 percent and North America the remaining 14 percent.

Further details on Elekta can be found at our website and in our [annual report](#), which includes the annual sustainability report (p. 36-62).

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, 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. It is also outlined in our People & Human Rights policy 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.

In addition, the Elekta Supplier Code of Conduct, includes more targeted and detailed requirements on Elekta's suppliers, as regards human rights and labour rights and the sourcing of conflict minerals. It 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 labour, modern slavery and human trafficking. All Elekta suppliers must commit to adhere to the Elekta Supplier Code of Conduct and deploy it upstream to their suppliers. The full version of the Supplier Code of Conduct is available on [our website](#). Elekta monitors compliance with the Supplier Code of Conduct through its Sustainable Sourcing Program (see below).

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

The parts of Elekta's supply chains where there is a potential risk of slavery and human trafficking taking place are predominantly in extraction of metals and minerals and in transportation, even if we assess these risks are more likely further upstream. The manufacturing stage of our supply chain is also at risk.

As part of the Sustainable Sourcing Program, Elekta implements a 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 of our suppliers under the Sustainable Sourcing Program is an ongoing, continuous process. Initial focus has been on direct material suppliers, then moving on to include indirect material suppliers, with the aim of putting attention further upstream in the supply chain. Under the Supplier Code of Conduct all Elekta suppliers are requested to impose the same requirements for their suppliers.

Based on factors such as location in high-risk countries, internal and external risk assessments and materials sourced for the products etc., suppliers are being risk categorized and identified for either on-site (high-risk suppliers) or desktop audits (medium-risk suppliers). We engage a third party (with a dash more correct) auditor (Intertek) to inspect the identified high-risk suppliers based on the requirements in the Supplier Code of Conduct. Non-compliance with the Supplier Code of Conduct on slavery and/or trafficking is considered one of the most severe types of supplier non-conformances, requiring immediate corrective action plans to remediate identified non-conformance. Elekta works with suppliers until the non-compliance is resolved, which is confirmed by a follow-up assessment. Ending a business relationship is a last resort, but the option if the supplier is not willing to improve. During the whole process, we engage with our suppliers and provide guidance when necessary to close potential non-conformities and improve results.

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. During FY 19/20, six suppliers were identified as high-risk. These included risks relating to health and safety at the workplace, working hours, compensation and benefits, freedom of association and social compliance supply chain due diligence. Elekta, through Intertek, conducted on-site audits with these suppliers. These audits resulted in a few non-conformities with the Elekta Supplier Code of Conduct, that have all been corrected within reasonable time. There has been no findings or indications of slavery or trafficking. No supplier relationships have needed to be terminated. There were no suppliers classified as medium risk during the year.

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
- Global 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. Now that Elekta is a member of the Responsible Minerals Initiative (RMI), we have tools and resources to further improve mineral supply chain traceability, including the Responsible Minerals Assurance Process (RMAP) which Elekta can make use of during communications with the supplier, sourcing choices and contract development. Elekta has set the ambitious target of making sure that 100 % of our suppliers of products containing minerals like tungsten, tin, tantalum, gold or cobalt, to guarantee that their minerals are sourced from validated smelters.

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 global whistleblower tool, the "Elekta Integrity Line", managed by an external service provider, can be used by anyone (internal or external of Elekta) for anonymous reporting of any suspected violations of the law, or concern in connection with, the Elekta Code of Conduct. Elekta Integrity Line is available 24/7, 365 days per year and enables persons to report via phone or email in all applicable languages.

Managing Director, Elekta Limited

Date: 9th December 2020

Name: Denise Mathieson



