

# Statement on Human Trafficking and Slavery for 2024

This Statement sets out the actions that STERIS plc and its subsidiaries (the "Company" or "STERIS"), has taken to prevent human trafficking and slavery in its businesses and supply chain in fiscal 2024. The Company opposes and prohibits all forms of slavery, servitude, forced labor, child labor and human trafficking in its operations, supply chain and by our business partners. The Company recognizes that human trafficking and slavery can occur in many forms. References in this Statement to "human trafficking and slavery" are intended to encompass any form of coerced labor.

## About the Company

STERIS is a leading global provider of products and services that support patient care with an emphasis on infection prevention. WE HELP OUR CUSTOMERS CREATE A HEALTHIER AND SAFER WORLD by providing innovative healthcare, life sciences and dental products and services.

We offer our Customers a unique mix of innovative consumable products, such as detergents, endoscopy accessories, barrier products, and other products and services, including equipment installation and maintenance, microbial reduction of medical devices, dental instruments and tools, instrument and scope repair, laboratory testing services, outsourced reprocessing, and capital equipment products, such as sterilizers and surgical tables, automated endoscope reprocessors, and connectivity solutions such as operating room integration.

## Overview of the Company Supply Chain

The Company manufactures, sources, and provides products and services to its Customers globally. The Company's supply chains include thousands of suppliers and are extensive and complex.

## STERIS Systems, Policies and Processes

The Company has implemented and maintains systems and processes to avoid complicity in human trafficking and slavery related to our operations as well as any such activity occurring in our supply chains.

The Company maintains a Code of Business Conduct ("Code"). The Code reinforces the Company's commitment to upholding human rights and requires all Associates, among other obligations, to act lawfully, ethically, and responsibly in their business practices, and to

comply with applicable laws. Associates are trained on the Code and must commit to adhering to the Code's policies. The Company requires all Associates to attest to their understanding of, and adherence to, the Code at the time of hire and on a regular basis thereafter.

The Company also maintains a [Supplier Code of Conduct \("Supplier Code"\)](#) defining requirements and expectations for ethical behavior by the Company's suppliers and business partners, and requiring compliance with applicable laws, including human trafficking and slavery laws. The Supplier Code appears prominently on the Company website for viewing by the Company's suppliers. The Company suppliers determined to be in violation of the Supplier Code are subject to disciplinary action, up to and including termination of the business relationship.

The Company's Code and Supplier Code are integrated into policies and procedures which are designed to provide an understanding of our program and responsibilities. The Company has adopted a Policy on Human Trafficking and Slavery ("Policy") which expressly prohibits human trafficking or slavery in any form. The Policy includes examples of specific practices that are prohibited and can be found by Associates on the STERIS intranet. In addition, the [STERIS Human Rights and Labor Rights Policy](#), which is accessible via the STERIS website, communicates the Company's recognition and appreciation of its responsibility to Associates health and safety, freedom of association, labor standards, equal employment, security, and privacy.

### **Risk Assessment, Verification and Monitoring**

The Company continues to take active steps to detect and prevent any violations of applicable human trafficking and slavery laws or conditions that may give rise to a violation. The Company does not have reason to believe that any human trafficking or slavery is occurring in any of the Company's businesses and continues to monitor for potential risks. To its knowledge, the Company's efforts to eliminate the use of forced labor or child labor in its supply chain has not resulted in a loss of income for the most vulnerable families, and no specific measures have been implemented in this regard. The Company has a dedicated Compliance team responsible for conducting an annual due diligence exercise to examine supplier risk.

The Company surveys its suppliers for risk of human trafficking and slavery via an online portal. This portal engages suppliers in the risk assessment process and, in doing so, helps the Company foster constructive dialogue and raise supplier awareness of its commitment to mitigating human trafficking and slavery risk.

Communications focusing on human trafficking and slavery, including stated obligations of both the Company and its supply chain partners, have been made available to suppliers in conjunction with the surveys. Those suppliers whose responses to the survey indicated a

higher risk of human trafficking and slavery were notified of their risk rating and were investigated further.

The Company assessed its internal labor practices in 2023 by surveying Human Resource operations to assess compliance with our internal policies. Responses received from Human Resources indicated no issues or cause of concern. As described in our Human Rights and Labor Rights Policy, STERIS is committed to upholding human rights. We oppose and prohibit all forms of slavery, forced labor, child labor or any other form of coerced labor in our own operations, our supply chain and by our business partners.

In December 2021, the United States passed the Uyghur Forced Labor Prevention Act ("UFLPA") which imposes a rebuttable presumption that goods produced or manufactured wholly or in part in the Xinjiang Uyghur Autonomous Region (XUAR) of the People's Republic of China, or by certain entities, are produced with forced labor and are not entitled to entry to the United States. In response, STERIS completed additional due diligence on this topic via research on our suppliers with operations located in China. Responses received from our suppliers and our subsequent research did not reveal any links to our supply chain in this region.

### **Supplier Audits**

The Company audits its supply chain as appropriate. Under the terms of the Supplier Code, the Company is permitted to audit its suppliers' compliance with the Supplier Code and standard terms and conditions. The Company regularly audits its suppliers for a variety of reasons, and if the Company deems it necessary, may choose to engage a third-party to evaluate compliance with our Code or Supplier Code.

The Company is committed to promptly investigating any claims or indications that a supplier may be engaging in conduct that does not comply with our Code or Supplier Code. Such matters are reviewed by the Company's Ethics Committee. Investigations are reviewed each quarter by the Compliance Committee of STERIS plc's Board of Directors. STERIS has not received any reports with respect to our businesses regarding human trafficking or slavery.

The Company's continued and increasingly vigilant engagement with its supply base will continue to enhance transparency and assist in compliance with the applicable human trafficking and slavery laws.

### **Certification**

The Company expects direct suppliers to comply with our Supplier Code and to comply with all applicable laws, rules, and regulations.

## **Accountability**

The Company will not work with any organization it finds to be knowingly involved with human trafficking or slavery. The Company encourages everyone, including Associates, contractors, and suppliers, to report in good faith any issues or concerns regarding human trafficking or slavery.

The Company Code sets forth communication channels to address questions or concerns that may arise or report violations. To further encourage compliance and the reporting of violations, the Company maintains an Integrity Helpline (reporting system) and website, available to Associates, Customers, suppliers, and all other business partners of STERIS. A strict anti-retaliation policy is followed, and reports may be made anonymously, where allowed by local law. All reports are promptly investigated.

Violations of the Company's Code, Supplier Code, laws, and regulations governing the Company's business, or Company policy may result in disciplinary action, including and up to termination. The Company may, if warranted, institute legal proceedings for violations of its Code.

## **Training**

The Company Directors and Senior Management are responsible for ensuring that the activities of the Company continue to comply with applicable human trafficking and slavery laws. The Company provides regular training to its Associates on the Company Code, including modern slavery and human trafficking. Further information is available to suppliers via our Supplier Code. The Company will continue to provide adequate resources, the commitment of its Associates, training, and investment to ensure compliance.

This statement was adopted and approved by the Board of STERIS Solutions Limited on 31 May 2024.

Michael J. Tokich  
Director

