



## **Modern Slavery Statement**

This statement has been published pursuant to section 54 of the UK Modern Slavery Act 2015, and applies to Mindray (UK) Limited, Mindray's ultimate parent company, Shenzhen Mindray Bio-Medical Electronics Co., Ltd. and its subsidiaries ("Mindray Group"). It sets out the steps taken by the Mindray Group during the financial year ended 31 December 2025 to address modern slavery and human trafficking in its business and supply chains. Unless stated otherwise, any reference to "Mindray" herein refers to Mindray Group as described in this paragraph.

Mindray is committed to fully complying with all applicable labour and employment laws, rules and regulations and working to mitigate the risk of human trafficking in our business and supply chains. This Statement is consistent with the Mindray Code of Business Conduct and Ethics and Mindray core values of treating all people with respect and dignity. This Statement will also be available at <https://www.mindrayuk.com/modern-slavery-statement/>.

The Modern Slavery Act 2015 requires commercial organisations with an annual turnover exceeding £36m and operating in the UK to produce an annual transparency statement. Over the years Mindray UK Ltd have been publishing an annual transparency statement regardless of its financial performance in the relevant financial year, to show its commitment to combatting any form of slavery and human trafficking.

### **Introduction**

Mindray takes its responsibility as a positive global corporate citizen to heart. Mindray is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. At Mindray we are committed to improving our practices to combat slavery and human trafficking.

Mindray was founded on the belief that every life is valuable. As expensive and complex technology still remains out of reach for the majority of people, we are striving to improve healthcare by developing and sharing medical technologies with the world. In doing this we can provide better care for more people, not just with our customers in mind but with humanity in mind.

As a responsible corporate citizen, Mindray upholds the principle of respecting and protecting human rights, integrating it into the Group's mission, core values, and multiple systems related to talent management, business ethics, and supplier management. We explicitly endorse the United Nations' Universal Declaration of Human Rights, and have issued relevant Combating Trafficking in Persons Policy which prohibits any form of human rights violations such as human trafficking, commercial sex, and forced labour, and the Antidiscrimination, Anti-harassment and Anti-bullying Policy which clearly defines discrimination, harassment, and bullying, outline management responsibilities and complaint procedures.

Mindray actively participates in Corporate Social Responsibility (CSR) and Environmental, Social, and Governance (ESG) projects, and is committed to collaborating with Non-Governmental Organizations (NGOs) and industry partners to jointly promote the identification and mitigation of modern slavery risks. Mindray also engages in industry alliances to share best practices and promote ethical procurement standards in the global healthcare industry.

### **Mindray's Business**

Mindray is one of the leading global providers of medical devices and solutions. Headquartered in Shenzhen, China, Mindray has established 64 international subsidiaries in about 40 countries in North

America, Europe, Asia, Africa, Latin America and other regions, as well as 36 subsidiaries and over 30 branches in China. Mindray has developed an R&D innovation platform based on global resource allocation, which includes 12 R&D centers in Shenzhen, Wuhan, Nanjing, Beijing, Xi'an, Chengdu, Hangzhou, Silicon Valley, New Jersey, Minnesota, HyTest of Finland, and DiaSys of Germany. Mindray has formed a huge global network that integrates R&D, sales and marketing, and services. To find out more about the nature of our business, please [click here](#).

## **Our Supply Chains**

Mindray integrates the concept of sustainable procurement into the whole life cycle management of suppliers, and establishes a robust and sustainable supply chain management system to lay a solid foundation for promoting high-quality and sustainable development of the supply chain.

In order to produce and distribute our medical devices and solutions, Mindray work with a range of suppliers involved in the procurement of raw materials, services, logistics, as well as product transportation to our warehouses, agents, distributors and end customers.

Our suppliers come from all over the world. Mindray work mainly with Chinese suppliers, but also with suppliers from the United States, Germany, Sweden, Finland, the United Kingdom, Japan and other countries.

Mindray requires its suppliers to respect and not to infringe in any way internationally-recognized rights of employees, and also requires its suppliers to comply with all applicable laws and regulations to offer fair working conditions and implement health and safety management processes for all aspects of their business activities.

Based on the long-life cycle of Mindray's products, we expect to maintain long-term cooperative relationships with suppliers. More than 45% of suppliers have cooperated with Mindray for more than 10 years. In the process of supplier introduction and cooperation, suppliers are continuously reviewed and trained to achieve the goal of long-term development in harmony with each other.

## **Our Policies**

Mindray has recently updated its Group Code of Business Conduct and Ethics and published 2025 Sustainability Report, among other things, to better emphasise its commitment to combatting the risk of modern slavery in our operations and supply chain; in this respect, Mindray have also implemented a Combating Trafficking in Persons Policy, which applies to the Mindray Group except Mindray DS USA Inc., and our Mindray DS Combating Trafficking in Persons Policy, specifically tailored and applicable to our US legal entity, Mindray DS USA Inc.

## **Due Diligence**

### **Due diligence processes**

As part of our initiative to identify and mitigate risks, we have procedures in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

Mindray uses multiple methods to identify third parties risks, including Refinitiv Due Diligence data and analytics services and Lexis Nexis Diligence platform, web-based interfaces featuring global news, business, legal, public records and regulatory content, to conduct due diligence on third parties including but not limited to service suppliers. Mindray third parties management system has also been enhanced by the use of "Due Diligence Questionnaire for Business Associates" (*e.g.* distributors) that, among other things, addresses specifically Modern Slavery and Human Trafficking risks.

### **On-boarding, auditing and appraising our suppliers**

Mindray is committed to refining supply chain management strategy and strictly implementing the Mindray Sustainable Procurement Policy its supporting systems. By optimizing a three-tier procurement management committee structure comprising R&D, planning, and procurement functions, Mindray implement tiered reviews and collective decision-making for supplier onboarding, selection, evaluation, and elimination to ensure rigorous and rational management processes.

To enhance supply chain resilience and information management transparency, Mindray have established a comprehensive management framework outlining supplier compliance declarations and codes of conduct, alongside a multi-tiered interactive management system.

New suppliers are subject to due diligence checks, including (a) due diligence questionnaires, and (b) an on-site audits.

As part of the on-boarding process Mindray has also introduced a “Supplier Compliance Statement” that all suppliers must execute before performing a supply contract. The statement in question covers, among other things, Modern Slavery and Human Trafficking risks. Moreover, new contents related to Modern Slavery and Human Trafficking risks have been added to the ongoing "Mindray Supplier Review Assessment Form". Mindray conveys basic employee rights through supplier training and compliance documents, ensuring Tier 1 suppliers employees understand their employment rights. We also provide anonymous grievance mechanisms at Tier 1 level and plan to gradually cover Tier 2 and Tier 3 suppliers.

The on-site audit is managed by the Procurement Team, who will conduct the audit, and record the audit findings according to Mindray’s scoring standards. Conducting an on-site audit is Mindray’s standard approach, however at times Mindray’s Procurement Team may decide not to conduct an on-site audit based on the supplier’s risk-category and other factors.

The on-site audit includes questions to evaluate to what extent the supplier protects employees, including: (i) safety measures and protective equipment, (ii) reporting and records of any incidents or injuries, (iii) prohibition of child labour and compliance with local labour law, (iv) a working environment free from discrimination, (v) communication of employees’ rights, (vi) emergency planning, (vii) environmental management systems, (viii) compliance with environmental laws, (ix) waste management, (x) actions to monitor and minimize negative environmental impacts. Suppliers whose audit results are satisfactory can be introduced as qualified suppliers; whilst suppliers whose audit results are conditional upon the implementation of a rectification plan, will need to demonstrate compliance before being approved. The audit team tracks suppliers’ rectification efforts through an "Improvement Evaluation Form".

Suppliers that are already part of Mindray’s supply chain may be subjected to annual review from a responsible business perspective depending on their performance, risk profile, and importance for the business. The review process monitors, among other factors, the type of supplier, suppliers’ performance in the previous year, and compliance with Mindray’s responsible business requirements, which include prohibition on modern slavery, human trafficking, discrimination, harassment, sexual abuse and child labour. The above actions allows Mindray to have key performance indicators to measure progress in tackling modern slavery in its supply chain.

### **Supply chain management, monitoring and compliance**

Mindray has established a scientifically sound and rational supplier performance evaluation methodology and a category-specific assessment mechanism. In daily management, we continuously evaluate suppliers' performance through multiple means, including on-site audits, questionnaires, and performance appraisals. Based on the evaluation results, we support suppliers in building their sustainable capabilities. We conduct regular evaluations of existing suppliers in terms of quality, delivery, technology, cost, and ESG performance. This year, no suppliers with material issues were identified during regular evaluations. Based on the requirements outlined in our guidelines and the results of performance evaluations, we categorize suppliers into strategic, preferred, conditional, and

prohibited suppliers. For prohibited suppliers, we will no longer establish new partnerships and will gradually scale back or phase out existing operations.

We have zero tolerance to slavery and human trafficking. We have a procedure in place to monitor compliance and initiate remediation action. If there is a risk of non-compliance with any of Mindray's values, which include a prohibition on slavery and human trafficking, we issue a "non-conformity improvement evaluation form" to the supplier. Upon receipt of such form, the supplier has to initiate remediation action. Mindray will then check the effectiveness of the remediation, through a site visit if necessary. If the supplier fails to make effective remediation within the agreed period, Mindray will cease to conduct business with that supplier.

Mindray has implemented a training programme on Modern Slavery policies to Supply Chain employees and suppliers. In November 2025, Mindray organized the training sessions on "combating human trafficking, prohibiting child labour, and raising anti-harassment awareness". The training is elaborated on the company policies including the Combating Trafficking in Persons Policy, the Recruitment and Deployment Management Regulation, and the Anti-Discrimination, Anti-Harassment and Anti-Bullying Policy. With a coverage rate of 100%, the training aimed to deeply promote the Group's policies and requirements related to the protection of employees' rights and interests.

To the best of its knowledge, Mindray hereby declares that no incidents of modern slavery have been recorded or discovered within our organization or supply chain in the past 12 months.

### **Training and Further Steps Taken**

#### **Communication**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we regularly share our policies internally with our employees along with this statement.

Mindray (UK) has rolled out a mandatory training for its employees that helps understand how to identify and report signs of Modern Slavery and prevent modern slavery from happening.

#### **Further Steps**

In the last 12 months, as part of our commitment to combatting the risk of modern slavery in our operations and supply chain, Mindray has undertaken the following steps:

Mindray recently published its 2025 Sustainability Report which demonstrates its commitment to conducting business with integrity. The Sustainability Report emphasizes that this year, we further integrated brand licensing management into the committee's remit, strengthening compliance oversight and sustainability monitoring of authorized suppliers.

This year, we developed a rapid response platform and model for sudden risks, leveraging digital tools to promote information visualization and sharing across critical processes such as procurement, production, and logistics. This ensures swift response capabilities during emergencies, safeguarding stable supply chain operations.

An awareness campaign has been rolled out to explain the Group "Code of Business Conduct and Ethics" and better emphasise our commitment to doing business with integrity. The new Code of Business Conduct and Ethics, among other things, reinforces our commitment to combatting the risk of Modern Slavery and Human Trafficking.

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Mindray has recently implemented a Group Whistleblowing Policy to promote the company's legal and regulatory compliance in business operations and to encourage employees to report illegal and unethical activities as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, their confidentiality will be respected and that they will be protected against any form of retaliation.

Mindray UK keeps monitoring the completion rate of the UK mandatory training on modern slavery and human trafficking risks.

Mindray UK mandatory training helps understand how to identify and report signs of Modern Slavery and prevent modern slavery from happening. The training also:

- Helps understand the scale of Modern Slavery;
- Describes employees' responsibilities under the Modern Slavery Act 2015;
- Explains what Modern Slavery is;
- Explain how to spot the signs of Modern Slavery;
- and how to report Modern Slavery.

This year, in line with the Supplier Life Cycle Management Procedure, Mindray conducted audits of all suppliers. Among these, we performed on-site audits on all new suppliers and 246 Tier 1 suppliers.

Mindray established the Supplier Quality Academy, developing a comprehensive curriculum encompassing general training, targeted improvement initiatives, and sustainable enhancement programs to empower suppliers in elevating their quality management and sustainable development capabilities. Training outcomes are integrated into the supplier performance evaluation system, serving as a key reference for the following year's collaboration. In 2025, we invited 140 significant suppliers and 294 core management personnel to participate in the Supplier Quality Academy training.

Mindray, as a global medical solutions provider, has recently achieved an outstanding AA rating for its Environmental, Social and Governance (ESG) practices from Morgan Stanley Capital International (MSCI), a renowned international rating agency. This rating is the highest in the A-share market, signifying Mindray's impressive advancement towards being a leader in ESG management across the globe and specifically in the medical device industry.

According to MSCI's latest ESG rating report on Mindray, Mindray's sustainable development practices in the social and governance areas have promoted the rating upgrade. The company's practices in human resources management, product quality assurance, and business ethics are leading the industry.

Mindray places employees at the centre of the sustainable development strategy. Mindray has established 64 international subsidiaries in about 40 countries in North America, Europe, Asia, Africa, Latin America and other regions, as well as 36 subsidiaries and over 30 branches in China. Mindray prioritizes equality in the workplace, providing equal and broad development opportunities for every individual. Mindray factually respects cultural differences existing between different countries and regions while avoiding discrimination or prejudice based on age, gender, nationality, race, skin colour, or religious beliefs.

Regarding its corporate governance and business ethics, MSCI affirms the company's protection of whistleblowers and its regular compliance audits on anti-corruption practices. Mindray advocates and practices complete honesty and trustworthiness in all business operations, strictly complying with any laws and regulations related to anti-corruption, preventing conflicts of interest, anti-fraud, anti-monopoly, and anti-unfair competition. The company conducts regular ethics audits and encourages all employees to study relevant system rules and regulations. Furthermore, Mindray invites all stakeholders, including employees, suppliers, and others, to report any illegal or disciplinary action

related to the company via various channels - publicly or anonymously. The company firmly protects the rights and interests of whistleblowers and ensures that they are not subjected to any unfair or retaliatory measures.

Mindray was recently awarded the Silver Medal in the EcoVadis Sustainability Assessment, ranking among the top 25% of all evaluated companies. This recognition reflects Mindray outstanding performance within the global medical device industry and signifies its progression towards becoming a leader in ESG (Environmental, Social, and Governance) governance in the healthcare sector.

We believe the above mentioned achievements are a recognition for the efforts Mindray is putting to ensure the highest ethical standards are achieved by the organisation, including standards and regulations around Modern Slavery and Human Trafficking risks.

#### Approvals

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Mindray Group's modern slavery and human trafficking statement for the financial year ending 31 December 2025. It has been approved by the board of directors of Mindray (UK) Limited with respect to the financial year ending on 31 December 2025 and is signed on behalf of the board by its General Manager.

A handwritten signature in blue ink, appearing to read 'Paul Bailey', with a long horizontal stroke extending to the right.

General Manager

Paul Bailey