

# Modern Slavery Act Statement for the United Kingdom (UK), Australia, and Canada for the year ended 31 December 2025

## 1. Reporting Entity

This Modern Slavery Statement (**Statement**) is a joint modern slavery statement prepared and published by, Smith & Nephew plc, and its subsidiaries Smith+Nephew Pty Limited (ACN 000 087 507), Smith & Nephew Inc (Canada), Smith & Nephew USD Limited, TP Limited, Smith & Nephew (Overseas) Limited, T.J Smith and Nephew, Limited and Smith & Nephew UK Limited (together **Smith+Nephew**).

The Statement is published in compliance with the requirements of Section 54 of the UK Modern Slavery Act 2015, the *Modern Slavery Act 2018* (Cth), and the *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* and relates to Smith+Nephew's actions and activities during the financial year 1 January 2025 to 31 December 2025.

This Statement was approved by the Board of Smith & Nephew plc on 26 February 2026 and adopted by each of its relevant subsidiaries, details of which are set out in Smith & Nephew plc's 2025 Annual Report in the Notes to the Company Accounts section, published on 16 March 2026.

This Statement was prepared in consultation with Smith+Nephew group companies, to inform the identification of modern slavery risks and the policies and practices described in this Statement. The Statement describes actions and activities undertaken within our commercial operations and as part of our relationships with third party sellers of our products and suppliers who provide us with goods and services.

## 2. About Smith+Nephew and the Group

Smith & Nephew, a public limited company incorporated and headquartered in the UK, is a portfolio medical technology business focused on the repair, regeneration and replacement of soft and hard tissue. We exist to restore people's bodies and their self-belief by using technology to take the limits off living. We call this purpose 'Life Unlimited'. Smith & Nephew plc together with its subsidiaries (including those named in this Statement) (the **Group**) is committed to preventing slavery and human trafficking in our corporate activities and supply chains. Our employees deliver this mission every day, making a difference to patients' lives through the excellence of our product portfolio, and the invention and application of new technologies across our three global business units of Orthopaedics, Advanced Wound Management and Sports Medicine & ENT. As part of our RISE Strategy, we aim to be better through continuous improvement mindset and behaviours, raising the standard of care within our segments and reaching more patients with our continued focus on innovation. Information on our Strategy and product range is available at [www.smith-nephew.com](http://www.smith-nephew.com).



We operate in global markets valued at approximately \$50 billion annually. In 2025, more than 15 million patients were treated with our products. We directly employ over 17,000 employees and operate in more than 100 countries. We also have contingent workers and third-party sellers who are not directly employed by the Group.

Our revenue is divided across three main geographic segments: the US, other Established Markets (which includes Europe, Japan, Australia/New Zealand, and Canada), and Emerging Markets (which includes Latin America, Asia (excluding Japan), Middle East, Africa and Russia).

- Advanced Wound Management products are predominantly sold to wholesalers and intermediaries, while products in the other business units are sold directly to hospitals, ambulatory surgery centers as well as distributors.
- In the US and International Markets, with the exception of Advanced Wound Care and Bioactives products, products are generally sold direct to hospitals and ambulatory surgery centers.
- In Emerging Markets, products are predominantly sold through distributors and intermediaries.

We maintain focus on and take great pride in delivering products that are safe and effective for patients. We have manufacturing facilities in North America, South America, Europe, UK, Switzerland and Asia, and central contracted distribution facilities in the US, Europe and Asia.

Our manufacturing supply chain network includes more than 850 direct suppliers of goods and services globally. Products are manufactured both in-house and by third-party manufacturers and are then shipped to centralized distribution centres, as well as individual country locations that hold smaller amounts of inventory for immediate supply to meet local customer requirements. Additionally, our indirect supplier network includes more than 7,500 suppliers that provide supporting services in Distribution & Logistics, Facilities & Real Estate, Information Technologies, Research

& Development, Travel Services and others. We have mapped our supply chain at the Tier 1 level and require our Tier 1 direct suppliers to map their sub-tier suppliers in line with our due diligence requirements, in support of efforts to combat potential risks of modern slavery within our supply chains.

In accordance with the United Nation's (UN) Universal Declaration of Human Rights, we consider 'modern slavery' to encompass all forms of human exploitation, including child labour, forced labour, human trafficking, debt bondage, forced marriage, and domestic servitude. When assessing and addressing modern slavery risks in our supply chains, we are guided by human rights standards and principles as set out in the UN Declaration of Human Rights.

Our strategy and approach to delivering on our commitments to prevent modern slavery and human trafficking is driven by the Group's Chief Executive Officer and Executive Committee and implemented by various teams within the organisation. The Group's Board has oversight of environmental, social and governance (ESG) matters and approval of our Sustainability and ESG Strategy is a matter reserved to the Board.

The Group's Culture & Compliance Committee reviews our policies, procedures and progress on ESG matters as well as our Modern Slavery Statement prior to approval by the Board. The Group's ESG Steering Committee leads the development and monitoring of internal key performance indicators and metrics aligned to achieve our ESG objectives and the review of ESG policies and procedures. The ESG Steering Committee reports to the Group Executive Committee and progress reports are shared with the Group Board and its Committees. Our Sustainability Report, published annually, provides an update on our actions to deliver our Sustainability and ESG Strategy and a detailed update for each of our focus areas: People, Planet and Products.

We use the Global Slavery Index and the United States Department of Labor List of Goods Produced by Child Labor or Forced Labor to support supply chain mapping and to inform our risk assessments.

### **3. Our Code of Conduct and Group policies**

We conduct our business with integrity, honesty and professionalism. These principles are embodied in our Culture Pillars: Care, Courage and Collaboration. These Culture Pillars guide the behaviour of everyone at Smith+Nephew and within our Group, no matter where in the world we are located. We must all also follow and understand applicable laws, our Code of Conduct and relevant Group policies and procedures. Our Code of Conduct and Business Principles can be found on our website: <https://www.smith-nephew.com/compliance/code-of-conduct-and-business-principles/>.

We work with third parties who adhere to business principles and health, safety, social and environmental standards consistent with our own. Third parties who carry out business on our behalf, directly or indirectly, must also understand and follow applicable laws when carrying out that business, and manage their suppliers in

accordance with the same standards.

We are committed to:

- Taking a robust approach to preventing modern slavery and human trafficking in its corporate activities and supply chains;
- Supporting the Universal Declaration of Human Rights of the United Nations. This means we respect the human rights, dignity and privacy of the individual and the right of employees to freedom of association, freedom of expression and the right to be heard;
- Not using any form of forced, compulsory or child labour; and
- Helping third parties working for, and on, our behalf through additional guidance to explain how our Code of Conduct specifically relates to them and the goods or services that they provide. Our Third Party Guide to working with Smith+Nephew is located on our website at: <https://www.smith-nephew.com/en/compliance#code-of-conduct-+-third-party-guide-+-global-policies> and sets out our requirements for third parties based on the laws, regulations and industry codes that apply to Smith+Nephew.

Our Code of Conduct is supported by global policies and programmes that help mitigate against the risk of modern slavery, including:

- Anti-Bribery, Corruption and Fraud Policy
- Commercial Practices Policy
- Privacy Policy
- Sustainability and Corporate Social Responsibility Policy
- Health, Safety & Environment Policy
- Global Procurement Policy
- Regional and/or local Recruitment policies
- Regional and/or local Harassment Free Workplace policies
- Conflict Minerals programme

Our Code of Conduct and global policies are available in 15 languages. Regional and/or local policies are available in local language.

We select third parties based on their qualifications, reliability and adherence to applicable laws and our values. We take all reasonable steps through our due diligence and risk assessment process to select partners that are committed to following the law and who behave ethically. We work with third parties who adhere to our Code of Conduct, Business Principles and health, safety, social and environmental standards consistent with our own. We are committed to sourcing materials from responsible suppliers.

Third parties working with us must either accept and agree to our Code of Conduct or provide a copy of their Code of Conduct that meets the minimum requirements of our Code of Conduct.

All new suppliers are subject to a Denied Party Screening check before they are on-boarded. Once suppliers are on-boarded, they are subject to a daily Denied Party

Screening check. We also receive and monitor daily supplier risk alerts through our SAP Ariba platform, regular ethical trade briefings, and investigate any other potential risks which we are notified about through our Compliance hotline or internal communications. This allows us to monitor risk within our supply chain comprehensively, and to take specific actions in our risk management process with regards to specific countries or commodities where necessary.

Our Third Party Guide to working with Smith+Nephew states that third parties working with us may not use any form of forced, compulsory or child labour. They must maintain a work environment in which all feel welcome and free of harassment, discrimination or other improper conduct. They must respect the human rights, dignity and privacy of the individual and the right of employees to freedom of association, freedom of expression and the right to be heard. This guidance helps third parties understand, follow and meet our expectations for them to:

- Always respect the human rights, dignity and privacy of the individual;
- Not use forced, bonded, indentured, child or involuntary prison labour;
- Provide a workplace free of harassment and discrimination;
- Build a diverse workforce based on an employee's qualifications and abilities needed for the work to be performed;
- Observe applicable laws and regulations governing wages and work hours; and
- Provide regular employment and avoid the use of labour-only schemes where there is no real intent to impart skills.

If a third party violates our guidance, applicable laws, regulations and/or industry codes of conduct, we will review that business relationship and take appropriate action, which may result in termination of the relationship.

Third parties working with us must commit to adhere to applicable laws and we seek assurances (through contract, due diligence or otherwise) that each third party who works with us:

- Conducts all business on Smith+Nephew's behalf in an ethical manner that is compliant with applicable laws, regulations and industry codes of conduct;
- Manages their suppliers in accordance with the same standards;
- Notifies Smith+Nephew without delay of any allegation received of a breach of our Code, applicable laws and industry codes that they discover, even if they are not directly involved; and,
- Protects whistleblowers' confidentiality and prohibits retaliation against workers who make a report in good faith.

All employees and other persons subject to our Code of Conduct are required to report all suspected breaches of the Code to a compliance officer or through other authorised reporting procedures. Any employee or person subject to our Code who is aware of a violation and fails to report it may face disciplinary action, subject to compliance with applicable laws.

We have a robust whistle-blowing procedure in all jurisdictions in which we operate in accordance with local legal requirements. We are committed to upholding our

promise in our Code of Conduct that we will not retaliate against anyone who makes a report in good faith. Our Group Chief Compliance Officer is responsible for reviewing Smith+Nephew's Code of Conduct and for addressing compliance-related concerns. The Chief Compliance Officer may, depending on the nature of the violation, report it to the Group Compliance & Culture Committee of the Board.

Smith+Nephew does not retaliate against anyone who makes a report in good faith. Reports can be made to management, our Compliance or Human Resources departments or our Speak Up Line.

#### **4. Our risk management activities**

Smith+Nephew assesses the risk of modern slavery within its directly employed workforce to be low. This assessment is based on our workforce composition, which consists of direct employees, with very few contractors hired through labour agencies and on regular reviews undertaken to ensure that our working conditions and salaries are at or above the levels required by applicable local laws and regulations (including the *Fair Work Act 2009* (Cth) as applicable and any relevant Industrial Awards).

We have identified an increased risk of modern slavery relative to direct workforce when we engage third-party suppliers to provide us with goods and/or services outside of the UK, Canada and Australia. For many of our suppliers, however, the risk of modern slavery within their supply chain, is still considered relatively low due to the highly regulated nature of the medical technology industry in which they operate and the need for our suppliers to purchase quality materials and components to meet our specification requirements, often working in accordance with our specific directions. Materials and components in the final products which we sell and distribute are additionally subject to quality control verifications undertaken by skilled employees who are required to assure the origin of relevant products and compliance with our specifications.

We recognise there is a potential for an increased risk of modern slavery practices with sub-suppliers with whom Smith+Nephew does not have a direct relationship, relative to Tier 1 suppliers with whom a direct relationship. This is due to the more limited visibility and control Smith+Nephew has with respect to the use of such sub-suppliers. Accordingly, we work as part of our risk assessment and due diligence programmes to promote and encourage transparency and best practice to seek to limit risk within sub-tier supply chains. We do this by requiring that our Tier 1 suppliers conduct their business and affairs in an ethical manner, consistent with the provisions of our Code of Conduct and Business Principles and we assess our supplier's compliance through our desktop Labour Standards questionnaire and on-site social audits. As part of our assessments, we confirm that Tier1 high risk suppliers are managing their sub-tier suppliers, consistent with our Code of Conduct and Business Principles.

A supplier may be assessed as higher risk in the event that: (a) the countries in which it manufactures and/or the raw materials in which it sources products are identified as higher risk countries for modern slavery practices; (b) the raw materials for the

relevant products are in industries that are considered higher risk for modern slavery practices (such as mining); or (c) where the supplier utilises low skilled labour in its manufacturing processes.

When issues are identified during our supplier relationship life-cycle, or as part of our risk assessment and due diligence programmes, our procurement team and, as necessary, our Global Procurement Lead, Responsible Sourcing will work with the supplier to mitigate risks and monitor the supplier/actions, which may include raising a Corporate Social Responsibility (CSR) Corrective and Preventative Action (CAPA). We also provide support to suppliers to assist them with establishing procedures or conducting due diligence, including with sub-tier suppliers, until any issue including any CAPA is resolved. A corrective action plan will be implemented with a timescale for resolution. If a CAPA cannot be resolved or there are repeat incidents which are not appropriately addressed, then we will establish an exit plan for the relevant supplier and arrange off-boarding. Where a CAPA is resolved, the relevant supplier will be placed under a three (3) year period of enhanced follow-up for further due diligence to ensure that they are re-assessed for continued compliance with our requirements.

In 2025, we completed due diligence analysis and assessments of one hundred percent of our Tier 1 suppliers and we continued our onsite audit programme for those suppliers identified as in scope for follow up, in line with our risk-based approach.

## **5. Our monitoring activities**

We aim to complete CSR-focused, risk-based due diligence of all our Tier 1 suppliers annually to ensure compliance with our sustainability requirements and publish our progress in our annual Sustainability Report (<https://www.smith-nephew.com/en/who-we-are/sustainability>). The Group ESG Steering Committee tracks our progress and reports quarterly to the Group Executive Committee and the Group Culture & Compliance Committee.

We have a Procurement ESG Management Review Board which meets at least once a quarter to discuss any ESG supplier Corrective and Preventative Actions, escalations or other ESG supplier issues, as well as to share updates on Regulatory changes, and customer or investor requests. We also use these meetings to monitor our performance against our supplier ESG performance KPIs and to discuss any potential changes to procedure or strategy. Any issues which cannot be resolved by the Procurement ESG Management Review Board are escalated to the ESG Steering Committee. In 2025 at our ESG Management Review Board, we evaluated progress of our supplier on-site social audit programme pilot and made the decision to embed the audit programme into our standard internal Supplier ESG Risk Procedure for 2026. We reviewed and re-committed to a 100% KPI for undertaking due diligence analysis and assessments for our Tier 1 suppliers.

## **6. Our due diligence**

We complete screening and due diligence of our existing Tier 1 suppliers according to our risk-based approach, and we undertake a risk assessment and due diligence for all new suppliers prior to their onboarding. Our process includes evaluating modern slavery and human trafficking risks for each supplier, and their management of their sub-tier supply chain.

As shown in the below graphic, we take a holistic approach to assessment of each supplier, to include assessment of the locations in which it operates and the category of supply, to determine whether the supplier should be designated as potentially high risk for modern slavery and human trafficking compliance.



Suppliers identified as potentially high risk during our initial assessment are required to complete a comprehensive desktop Labour Standards questionnaire. The questionnaire aligns with the Ethical Trading Initiative (ETI) Base Code, and requires suppliers to evidence the following in relation to the operation of their business and workforce:

- Employment is freely chosen;
- Workforce has freedom of association and the right to collective bargaining;
- Working conditions are appropriate;
- No use of child labour;
- Minimum wage laws are complied with;
- Operation of appropriate working hours;
- Employment is free from discrimination;
- Regular employment is provided; and
- No harsh and/or inhuman treatment.

We screen our new suppliers on a quarterly basis and within six months of their onboarding and existing suppliers are screened on an annual basis. We review our risk criteria for modern slavery and human trafficking periodically and in the event of updates to the UN GSI and US Dept of Labor List of Goods Produced by Child Labor or Forced Labor. Updates to our risk criteria are then flowed into our risk management process as necessary.

Supplier responses to our due diligence questionnaires and any documents provided are reviewed by our environmental, social and governance and global procurement

teams and follow up due diligence with the supplier is conducted, where necessary, to evaluate supplier risk. This involves direct communications with suppliers (e.g. emails and phone/video calls) to clarify our requirements and details of supplier's responses or to obtain any outstanding information, as necessary.

If the information obtained through the due diligence process substantiates a modern slavery risk or the supplier does not demonstrate that it is able to comply with all applicable law and regulations and/or Smith+Nephew's policies and procedures (including labour standards, sustainability, health and safety and environmental requirements), the relevant supplier will not be on-boarded or steps taken to off-board them if the risk or compliance issue cannot be appropriately mitigated or resolved. In 2025, we had one supplier that did not provide a satisfactory response to a request for information that we made further to a news article which was identified as part of our modern slavery risk monitoring activities. The news article indicated a presence of potential modern slavery risk within the supplier's operations. As we did not receive sufficient evidence from the supplier by way of response that they were able to comply with our requirements and that modern slavery risk was being adequately addressed, we determined to off-board the supplier and replaced them with an alternate supplier, taking steps to minimise any business disruption.

On an annual basis, we conduct a supply chain Conflict Minerals due diligence programme and issue a disclosure report in accordance with the reporting and disclosure requirements under Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank"). We support ending violence and human rights violations in all Conflict Areas. Further details on our Conflict Minerals Policy are available on our website: <https://www.smith-nephew.com/who-we-are/sustainability/conflict-minerals#conflict-minerals-policy>.

As part of our annual Conflict Minerals programme, our supplier due diligence framework requires suppliers to identify origin, source and chain of custody of materials potentially in scope of Dodd Frank, to encourage transparency in our supply chain. Our due diligence process for identification of Conflict Minerals, was designed according to the five step Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance.

Our dedicated Global Procurement Lead, Responsible Sourcing has oversight of and co-ordinates our supplier labour standards and sustainability efforts as a key focus within our due diligence programme.

## **7. Our training**

All staff receive annual training on our Code of Conduct and Business Principles.

Relevant employees (including procurement staff, those working in areas relating to ESG matters and health and safety or advisory functions) undertake annual training on modern slavery issues and risks to enable them to identify and take appropriate actions as necessary, including in dealings with our third-party suppliers. This training includes practical examples and guidance to support risk assessments and the taking of necessary actions.

Our Third Party Seller Global Compliance Programme ensures that due diligence expectations are met before we engage with a distributor or agent who generates demand for our products. We provide training to distributors and agents to reinforce our expectations for compliant and ethical behaviour and set out clear rules for them to follow. Additional compliance guidance is provided to our employees who operate our compliance programme and who manage and work with our distributors and agents.

Our modern slavery training covers:

- Purchasing practices which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to identify the signs of slavery and human trafficking;
- What initial steps to take if slavery or human trafficking is suspected; and,
- What steps to take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Web-based training is provided by a third party and is reviewed annually.

## **8. Effectiveness of our actions and Continuous Improvement**

During 2025, we continued to enhance our due diligence and other controls around vendors, suppliers and service providers to increase their robustness and to make it easier for employees to evaluate suppliers and third-party related risks.

We continued our supplier on-site social audit programme, which we have found to be an effective learning exercise both for our internal teams and for building relationships with our suppliers, developing mutual trust and understanding.

We progressed with our pilot programme by continuing to carry out and widening the use of combined supplier on-site social and quality audits. We provided further training for our supplier quality teams to increase the number of employees able to complete combined audits. The training was delivered through on-site social audit shadowing and focused training sessions lead by our Global Procurement Lead,  
Responsible Sourcing.

As part of our audit program, we have implemented a toolkit for cross functional teams to use to support consistency of approach to future on-site social audits, for example questionnaires reflective of our risk based due diligence approach which cover agenda, assessment criteria, example questions for interviews and outcomes tracking tools.

We have continued to obtain supplier responses using embedded questionnaires and automatic follow-ups within our Ariba Procurement system.

Having an internally led supplier due diligence programme enables us to be agile in our approach. We can adapt our internal questionnaires, implement changes in line with laws and regulations as required, and promptly address risks through direct communications with our suppliers and track responses within our Ariba Procurement system dynamically. To ensure that we are effective in our approach and continuously improving, we obtain external guidance and monitor global and industry specific developments.

This Statement and previous statements are available as follows:

For the UK, on the UK Modern Slavery Statement Registry at <https://modern-slavery-statement-registry.service.gov.uk/>.

For Australia, on <https://modernslaveryregister.gov.au/statements/>

For Canada, on the Public Safety Canada registry at [www.publicsafety.gc.ca/cnt/rsrscs/lbrr/ctlg/index-en.aspx](http://www.publicsafety.gc.ca/cnt/rsrscs/lbrr/ctlg/index-en.aspx).

## **9. Continued Commitment**

Smith+Nephew works hard to identify areas for enhancement and improvement of our global compliance programme. We remain flexible in our approach to preventing modern slavery, and we continue to adapt our policies and procedures to respond to rapid changes in the global landscape in which our supply chain operates.

We will continue to review our performance against customer and stakeholder requirements and industry performance more broadly, in line with our Culture Pillars of Care, Courage and Collaboration.

Yours sincerely,



**Deepak Nath**  
**Chief Executive Officer**

26 February 2026