

D.O.R.C. Dutch Ophthalmic Research Center (International) B.V. Modern Slavery Statement

Introduction

This statement is in relation to D.O.R.C. Dutch Ophthalmic Research Center (International) B.V. (“**DORC**”) and its subsidiaries to satisfy the requirements of Section 54 of the Modern Slavery Act 2015, which provides information regarding organizations’ efforts to address the issue of slavery and human trafficking.

In accordance with Section 54 of the Modern Slavery Act 2015, this statement sets out the steps that DORC takes to ensure that modern slavery, human trafficking, forced labor and labor rights violations are not occurring in our business or in our supply chain.

Our Organizational Structure

DORC is a private limited liability company established in the Netherlands. As DORC is one of the world’s leading suppliers of equipment, instruments and liquids for ophthalmic surgery, it is central how we want to run our business by referring to our core values: Customer focus, teamwork, innovation, compliance, accountability and clarity.

DORC exports its instruments and equipment to more than ninety countries worldwide with over 800 dedicated professionals worldwide and has its own sales and marketing organizations in Austria, Belgium, China, Finland, France, Germany, Italy, the Netherlands, Norway, Spain, Sweden, UK, USA.

Our UK Business

DORC conducts business in the UK through D.O.R.C. Limited, which is incorporated as a private limited company in 2011 and located in Essex, United Kingdom. D.O.R.C. Limited is obliged to follow the DORC Global Code of Conduct and other corporate policies of DORC, which stipulates the rules and principles to cope with modern slavery risks in our own business and in our supply chain.

Within the scope of its business activities, D.O.R.C. Limited also accepts, complies and follows up with the Supplier Code of Conduct issued by the NHS Supply Chain, which sets out the main standards and principles for the supply service, including child labor, compensation and working hours and improper payments/bribery.

Our Commitment

DORC fully supports the intent and approach of the Modern Slavery Act 2015 and opposes human trafficking and slavery in all forms. DORC believes in the fundamental respect for human rights of all stakeholders and local communities in which DORC conducts business. DORC works to the highest professional standards to ensure that we comply with all laws and regulations applicable to DORC.

DORC is committed to conducting our business activities in compliance with human rights laws globally and adhering to the human rights principles outlined in the Universal Declaration on Human Rights (UDHR), which was adopted and proclaimed by the United Nations General Assembly on 10 December 1948. No human rights violations by DORC or any director, officer, employee or person doing business on our behalf will be tolerated. In accordance with the DORC Global Code of Conduct, all DORC employees have an obligation to conduct business with integrity including respecting human rights.

DORC is committed to improving our practices to combat modern slavery and human trafficking (including slavery, servitude and forced or compulsory labor) within our own organization and within our external supply chain and also monitors our labor force and supply chains that they are "slavery free". DORC also expects our suppliers to conduct business abiding to all applicable laws, rules and regulations.

Our Corporate Policies

As DORC takes this statement and our responsibilities seriously to prevent modern slavery and trafficking within our organization structure and in our supply chain, DORC's strong system of internal controls enables all DORC employees to comply with corporate policies and applicable laws and regulations, which includes the followings:

- DORC Global Code of Conduct protects all DORC employees from unfair or unethical working conditions, including bonded, forced or child labor.
- DORC Corporate Social Responsibility Policy is endorsed and ingrained at the highest level, which aims to guarantee that we work ethically considering human rights. This policy ensures that the labor law, ethical standards or moral obligations are not violated in any part of our business or the supply chain.
- DORC Labor Standards Assurance System Policy provides clarity on our understanding and awareness of the labor standards and our commitment to human rights.
- DORC Conflicts of Interest Policy refers to the rules and principles for preventing or managing conflicts of interest by emphasizing the importance of the transparency in the form of disclosure.
- DORC Due Diligence Policy stipulates a mandatory due diligence check prior to engaging in any business relationship and the monitoring process, which allows to conduct business only with reliable business partners who maintain the highest standards of business integrity.
- DORC SpeakUp Policy enables and encourages all DORC employees to report any misconduct or suspicion of a misconduct through DORC speak up channels, which will be kept in strict confidence.
- DORC Compliance Training and E-Learning Policy ensures that DORC employees receive necessary compliance trainings regarding the DORC Global Code of Conduct and other corporate policies.

The DORC corporate policies apply to all DORC employees, officers and directors. DORC is committed to adhering to the highest standards of ethics and integrity in all of our interactions with patients, health care providers, customers, fellow colleagues and other key stakeholders. DORC vigorously enforces these policies and will take prompt and appropriate actions in case of any violation.

Our Supply Chain

DORC uses a risk-based assessment process for evaluating, verifying and selecting suppliers as DORC expects all of its suppliers to abide by all applicable laws and regulations and maintain the highest ethical standards. This process consists of several steps including but not limited to supplier questionnaires, supplier risk assessment and supplier audits.

DORC regularly conducts audits of its suppliers to assess, verify and confirm their compliance with applicable law and regulations and good manufacturing standards, as well as the performance of obligations and compliance with supply agreements. DORC may conduct its own supplier audits directly or through a third party inspection company.

DORC also includes provisions in its supply agreements and other arrangements with our suppliers to ensure that they comply with applicable laws and regulations to build up a long lasting relationship and structure with high ethical standards in terms of human rights, environmental obligations etc. In case of any breach of the obligations by the supplier, DORC takes necessary actions to the extent it is legally permissible.

Future

DORC is committed to continually demonstrate additional improvements and enhancements to prevent modern slavery and human trafficking risks in our business and in our supply chain. This includes ongoing review of our corporate policies, compliance trainings and further development of initiatives to raise awareness amongst our employees and suppliers in the areas of labor standards, environmental health and safety.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and covers the DORC's financial year ended 31 December 2024. The statement was approved by the Board of Directors of DORC on 3 October 2024 and signed by DORC Topco B.V., on its behalf by the Chief Executive Officer, Pierre Billardon.

Pierre Billardon

CEO of DORC Topco B.V., who is legally representing D.O.R.C. Dutch Ophthalmic Research Center (International) B.V.
3 October 2024