

Modern Slavery and Human Trafficking Statement

Oncosem is a leading medical device manufacturing and service company based in Türkiye, aiming to provide the highest quality solutions to healthcare organizations, healthcare professionals and patients.

Oncosem is committed to conducting business in compliance with all applicable laws, including employment and human rights laws and regulations, in all areas in which they operate.

Our aim is to act ethically and with integrity, avoiding all forms of modern slavery within our operations.

Oncosem employs over 300 people in Türkiye.

All of our employees receive technical training as well as job responsibility training at their induction, and their job descriptions are clearly explained to them. Information on modern slavery and human trafficking is also included in these trainings and job descriptions.

We have reviewed risk assessments for areas at risk of modern slavery. Currently, we manufacture more than 50% of our products in our own factory. Semi-finished products that we do not manufacture in our factory are supplied from European and Chinese companies. In this sense, we stay in contact and develop cooperation with our suppliers regarding the risks of modern slavery and their efforts on this issue.

Our areas of observation encompass the entire production process, from the procurement of raw materials and certain semi-finished products to their transportation and delivery. Issues such as child labor, forced labor, and debt bondage are among the foremost concerns.

Oncosem is taking steps to monitor labor conditions throughout the supply chain and report practices suspected of employment and modern slavery practices. However, it is challenging to uncover practices that are hidden. As part of our activities with suppliers and contractors, Oncosem requires them to provide assurances that modern slavery practices are not taking place and are being addressed.

The largest risk area within the supply chain is raw material suppliers that do not directly engage with our company as Oncosem. In these fields, we increase our focus on the parties involved in the processes before our relevant suppliers. We share our own practices with our suppliers and request them to conduct such a study with their suppliers and contractors. In this sense, we seek to extend our involvement to the most extreme points in our supply chain.

In the light of these studies, Oncosem carries out all its activities in accordance with human rights and expects the same diligence from its suppliers. Oncosem does not tolerate human rights violations that may occur during its activities. In this respect, Oncosem requires the following from all its suppliers;

- Not to employ child labor and to comply with all rules set by the International Labor Organization,
- Refrain from all labor practices that violate human rights, including unacceptable treatment such as forced or compulsory labor, informal labor, bonded labor, exploitation, corporal punishment, all forms of modern slavery and human trafficking,
- Not to expose its employees to any form of discrimination (race, religion, language, color, gender, sexual orientation, disability, etc.),
- Not use or permit mental, physical, sexual or verbal abuse, harsh or humiliating disciplinary action,
- Not to pay its employees below the minimum wage set by law and to be fair,
- To align working hours and employee rights with the relevant laws in the country of operation,
- Respect the right of its employees to form or join independent trade unions or to organize.

Oncosem informed all its suppliers, especially those working in its own manufacturing field, on how to avoid modern slavery in order to spread awareness on this issue, and it is extremely important for our company to develop cooperation and take a stance on this issue.

Sample studies we have carried out within our own organization are as follows:

- Our Human Resources department is fully accessible to all our employees.
- Our Human Resources department provides detailed information to the personnel about all their rights when needed and answers all kinds of questions received by our personnel in a clear and understandable manner.
- In our factory, "Open Door Policy" is organized on certain days and hours of the week where all our personnel can communicate directly with the factory manager without the need for hierarchy.
- Periodically, a personnel satisfaction survey is conducted by the Human Resources department and the results are discussed with the plant manager.

We will increase our focus on this issue by following the below studies in the forthcoming period:

- It will be ensured that the risk assessments and audits we implement in our factory are also communicated to our suppliers through the Quality Department and the Human Resources Department. The questionnaire to be prepared in this regard will be sent to our suppliers and they will be requested to declare that they are completely transparent in this regard. In addition, our suppliers will be requested to provide a declaration that they do not have modern slavery practices within their organization and to renew this declaration on an up-to-date basis.
- We commit to preventing modern slavery and human trafficking in our operations and supply chain and our policy will be developed and communicated to all our employees and suppliers. Preventive activities will be encouraged and monitored.
- Studies will be carried out in cooperation with our legal department by researching the relevant legislation of our country and other countries and how they can be adapted to our employees and suppliers.
- Our policies and processes on modern slavery will be kept up to date and shared throughout our supply chain through this form and preventative work will be carried out.
- We are actively involved in developing awareness throughout our supply chain and we are committed to improvement. In order to reinforce this awareness also by sharing it with our personnel, it is among our efforts to provide trainings on modern slavery awareness at certain intervals.
- In order to establish and maintain a more in-depth management mechanism, the Human Resources department will prepare a comprehensive report on the issue every 6 months and we will share it throughout our supply chain and we already have a supplier approval process that includes a risk assessment and ethics survey.

Oncosem declares to be an anti-Modern Slavery business, shares this declaration and encourages ethical work in this field. We will continue to lead the industry with our anti-Modern Slavery practices and our commitment to creating and sustaining global impact throughout our supply chain.

Erol Çelik

CEO

19.11.2024

