



UK Modern Slavery Act Disclosure: Fiscal Year 2020

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes the Modern Slavery and Human Trafficking Statement for the financial year commencing 1 January and ending 31 December 2020 for Stryker Corporation ("Stryker") on behalf of itself and those of its affiliates that are subject to the Act. This statement sets out the steps that Stryker has taken to ensure that slavery and human trafficking does not take place in our business operations or supply chain.

Stryker's Structure, Business & Supply Chain

Stryker is one of the world's leading medical technology companies and, together with our customers, we are driven to make healthcare better. We offer innovative products and services in the Orthopaedics, Medical, Surgical, Neurotechnology and Spine sectors that help improve patient and hospital outcomes. Stryker is headquartered in Kalamazoo, Michigan with sales offices located in the UK and throughout the world. Our commercial division headquarters and internal manufacturing sites are primarily located in North America and Western Europe. Our direct supply chain consists of several thousand suppliers also located primarily within North America and Western Europe. The majority of these suppliers are long term partners helping Stryker to meet the evolving needs of our customers and their patients.

Stryker's Policies in Relation to Slavery & Human Trafficking

Stryker is committed to maintaining a safe work environment and managing our affairs ethically, lawfully, and to the highest standard of business conduct. Stryker's Code of Conduct establishes policies and procedures that guide employees, officers, and directors in the performance of their duties and responsibilities and ensure compliance with this commitment to ethical and lawful conduct. Violations of our Code of Conduct will not be tolerated and will result in disciplinary action, including termination of employment where appropriate. We require our employees to certify their compliance with the Code of Conduct on an annual basis. We also provide access to our Ethics Hotline which enables anonymous reporting by employees, suppliers and members of the public of any suspected misconduct or unlawful activity so that it can be properly investigated and remedied, without fear of retaliation.

Compliance & Governance

At Stryker, we are committed to doing what's right. Good corporate governance is essential to everything we do. We conduct our affairs in compliance with all applicable laws and regulations and in accordance with the highest ethical standards. All employees at Stryker are responsible for compliance with Stryker's policies and procedures, including maintaining a safe work environment in compliance with all applicable laws.

In addition, Stryker maintains a strong Global Compliance program to continuously monitor and ensure Stryker's compliance with these values. Stryker has implemented a number of Compliance Committees to monitor different aspects of Stryker's business which monitor Stryker's compliance with Stryker's policies, procedures, and all applicable laws and regulations, including those which relate to modern slavery, and investigate and respond to any relevant reports made through our Ethics Hotline.

Understanding the importance of quick identification and remediation of any potential acts of modern slavery, our Global Quality & Operations Compliance Committee includes a representative from Stryker's Global Procurement team. This Committee investigates any relevant reports made to our Ethics Hotline regarding modern slavery. Our procurement leadership team also regularly reviews the actions being

taken to assess the risk of modern slavery in our global supply chain and identifies additional areas of opportunity for improvement.

Within the United Kingdom, Stryker UK has adopted UK-specific KPIs that are assessed and monitored on a quarterly basis by the UK Compliance Committee.

Due Diligence in Our Business & Supply Chains

Stryker believes in the protection of human rights within our global supply chain. The Stryker Supplier Code of Conduct communicates the expectations we have for our suppliers in several key areas and specifically addresses the prevention of acts of modern slavery. Violations of applicable law, including the use of child and compulsory labor, slavery and human trafficking, and unsafe or hazardous working conditions are strictly forbidden. Stryker requires that our suppliers maintain a management system designed to ensure compliance with the Supplier Code of Conduct, provide a complaint mechanism for their employees to report workplace grievances or violations of our Supplier Code of Conduct free from threats of reprisal, intimidation, or harassment, and that they investigate and take corrective action on any complaints. Supplier employees may also utilise the Stryker [Ethics Hotline](#), which enables anonymous reporting of any suspected misconduct or unlawful activity so that it can be properly investigated and remedied, without fear of retaliation. Stryker requires adherence to the Supplier Code of Conduct through contractual arrangements with our Suppliers.

In 2020, our direct procurement team continued to work closely with our suppliers to ensure acceptable performance of their contractual obligations and performance. This work includes understanding any critical risks a supplier may pose to our business, including those relating to potential acts of modern slavery. The relationship management strategies employed with our suppliers incorporate the mitigation of any identified risks and the consideration of overall risk when determining visitation and audit frequencies. In response to the COVID-19 pandemic, Stryker maintained its commitment to comprehensive supplier management by utilizing technologies to virtually connect with our suppliers.

Risks of Modern Slavery

In addition to the above, we evaluated publicly available reports, including the Global Slavery Index and the U.S. Department of Labor's "List of Goods Produced by Child Labor and Forced Labor", to understand regions and industries with which Stryker engages that are most at risk for acts of modern slavery and assess any implications that could have within our supply base.

Based on publicly available research, Stryker is aware that manufacturing is generally considered at a higher risk of modern slavery. Not only working conditions in factories and manufacturing sites, but the procurement of certain raw materials can elevate the level of risk in the supply chain. The majority of Stryker's manufacturing sites, and the suppliers that support them, are located in countries which are not considered high risk jurisdictions by the Global Slavery Index.

The primary raw materials and components used in Stryker's manufacturing of products are plastics, metals, electronics, packaging and other specialty materials, including textiles. According to publicly available reports including the Global Slavery Index and the U.S. Department of Labor's "List of Goods Produced by Child Labor and Forced Labor", some of these industries are known to be higher risk based on where the work occurs, or to incorporate higher risk materials within their extended supply chains, including the use of tin, tantalum, tungsten and gold originating from conflict regions in the Democratic Republic of the Congo and its adjoining countries.



As a result of our 2020 risk assessment, and in the spirit of continuous improvement, we are currently finalizing additional risk monitoring and assessment strategies within our Procurement Center of Excellence, including supplier self-assessments with respect to, among others, risk of modern slavery. These efforts and the results of the supplier self-assessments will be utilized to further support our procurement teams in their supplier management activities.

Specific to the responsible sourcing of tin, tungsten, tantalum and gold originating in the Democratic Republic of the Congo and nearby countries, Stryker maintains a Conflict Minerals Policy. Stryker supports this policy by conducting reasonable country of origin inquiries and due diligence consistent with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and requires its direct suppliers to conduct supporting due diligence within their supply chains. Stryker files an annual form SD and Conflict Minerals Report with the U.S. Securities and Exchange Commission which further details these efforts.

Stryker is also committed to working with non-government organisations to address human rights within our global supply chain. To this end, Stryker has formalized its membership with the Responsible Minerals Initiative.

Training & Education

In 2020, a key focus for Stryker was training and education. Our procurement employees completed annual Supplier Code of Conduct training which covers the key areas included in the Supplier Code of Conduct, our suppliers' compliance obligations, and how to utilize the Supplier Code of Conduct in the management of any suppliers for which they have responsibility. Our procurement and supplier quality employees are also required to complete annual training focused on the prevention of modern slavery in our supply chain. This training focuses on the forms of modern slavery, prevalence, risk factors, identification, and reporting mechanisms with the expectation that our procurement and supplier quality employees monitor our suppliers and are vigilant during any visits to a supplier location.

Conclusion

Stryker continually evaluates its risk management processes and procedures in order to identify opportunities for continuous improvement, including the periodic review by senior management of the actions being taken to assess the risk of modern slavery in our business operations and supply chain.

Through these efforts Stryker remains committed to playing our part in preventing any act of modern slavery within our business and global supply chain.

Last updated: July 2021. This statement was approved by the Stryker UK Limited Board of Directors.

A handwritten signature in black ink, appearing to read "Paul Bean", is located below the text of the last updated statement.

Paul Bean
Vice President & Managing Director
Stryker UK & Nordics

