

# **2024 Modern Slavery Statement**

Stryker Australia Pty Limited

Prepared by Stryker Australia Pty Ltd

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## Reporting entity

This statement is made by Stryker Australia Pty Ltd ABN 48 002 873 850 ("**Stryker Australia**") in accordance with the Modern Slavery Act 2018 (Cth) (the "**Act**") for the period 1 January 2024 – 31 December 2024 ("**Reporting Period**"). This statement outlines actions taken to address potential modern slavery risks in our operations and supply chain.

## Business overview

### Stryker Australia

Stryker Australia employs over 1,000 people. Stryker Australia employs most of its employees directly and on permanent contracts. This reduces the risk of modern slavery within Stryker Australia's operations.

Stryker Australia also engages third party labour services to provide contractors. Although Stryker Australia does not have direct control over the employment terms of those contracted parties, it strives to ensure that all contracted parties and third-party labour providers meet Stryker Australia policies, codes of conduct, and pre-qualification requirements before they are engaged and over the course of their engagement.

Stryker Australia also requires that third-party labour providers provide warranties as to their compliance with all laws in relation to employment matters and the Act.

Stryker Australia is a subsidiary of Stryker Corporation ("**Stryker**") and conducts its business as an exclusive distributor of Stryker products from premises in Sydney, Melbourne, Brisbane, Perth and Adelaide.

Stryker's approach to human rights and modern slavery is included in this document as many of Stryker's policies and processes apply to Stryker Australia. Stryker and its related entities are also Stryker Australia's primary direct supplier.

Stryker Australia sells, loans, consigns and services medical products manufactured and provided by Stryker's overseas operations to hospitals, as well as providing demonstration equipment for trials by surgeons and hospitals.

Stryker Australia does not have any manufacturing operations in Australia.

### Stryker

Stryker is a global leader in medical technologies and, together with our customers, we are driven to make healthcare better. We offer innovative products and services in MedSurg, Neurotechnology and Orthopaedics that help improve patient and healthcare outcomes. Alongside our customers around the world, we impact more than 150 million patients annually. More information is available at [www.stryker.com](http://www.stryker.com).

Stryker is headquartered in Kalamazoo, Michigan, United States and our more than 53,000 employees operate in approximately 75 countries worldwide, including operations in the following geographic areas: United States of America (including Puerto Rico); Europe, the Middle East, Africa; Asia Pacific; Canada and countries in Latin America.

With operations and supply chains spanning the globe, Stryker is committed to improving the working conditions of people who are connected to our business. We recognize the need to monitor for conditions that put workers at risk of human rights abuse, including modern slavery. The term 'adverse human rights impact' is used throughout this statement and includes within its meaning all elements of modern slavery as defined by the Act.

Stryker's risk of adverse human rights impact in its global operations is low where we employ directly. Human rights risks associated with our supply chain are managed through ongoing risk assessments and due diligence activities described in this statement.

More information about Stryker can be found in our most recent [Comprehensive Report](#).

In this statement, the collective expressions "we", "us", "our", are used when we refer to Stryker Corporation and any entities which it owns or over which it has control because we operate using group-wide policies and procedures to assess and manage risk of adverse human rights impact. It is not intended to convey how we are structured, managed or controlled.

## Policies

### **Stryker and Stryker Australia**

Our company values of integrity, accountability, people and performance underscore how we deliver on our mission to make healthcare better, serve our customers, employees and communities and protect the planet.

Making healthcare better means conducting all aspects of business ethically and lawfully. Our Code of Conduct sets out our expectations of all employees and business partners to conduct business the right way.

Our [Code of Conduct](#) and [Supplier Code of Conduct](#), which serve as guides for how we do business and include:

- No forced labor, involuntary labor or human trafficking
- No child labor and fair treatment of young workers
- Fair labor practices
- Nondiscrimination and antiharassment
- Safe working environment.

Additionally, our [Position on Human Rights](#) outlines our commitment to respecting human rights, including modern slavery and we expect all third parties doing business with Stryker to share our commitment to safeguarding human rights, including risks of adverse human rights impacts.

### **Stryker Australia**

Stryker Australia is committed to the highest standards of legal, ethical and moral behaviour and has a [Whistleblower Policy](#) available that outlines the process for reporting complaints.

## Governance

### Stryker

Stryker's mission and values, company strategy and Code of Conduct support our corporate responsibility (**CR**) work. The Governance and Nominating Committee of our Board of Directors oversees all CR matters. Our CR Steering Committee includes three executive officers who report to the CEO. More information about our Corporate Responsibility governance can be found in our most recent Comprehensive Report.

Our Human Rights Council, the highest body responsible for human rights governance and due diligence, is a global, cross-functional team. The Council's members provide input and counsel on human rights strategy and initiatives, embedding and advocating for human rights principles in their respective functions and tracking implementation and results. Our Group President of Global Quality & Operations serves as executive sponsor. The Council reports directly to Stryker's CR Steering Committee and provides regular updates on human rights topics.

In addition, Stryker maintains a strong Global Compliance program to drive Stryker's compliance with our mission and values. Stryker has several Compliance Committees, comprised of senior leaders, that monitor Stryker's compliance with Stryker's policies, procedures, including our Position on Human Rights, and all applicable laws and regulations, including those which relate to human rights, and investigate and respond to any relevant reports made through our Ethics Hotline.

### Stryker Australia

In 2024, Stryker Australia established a Climate and Sustainability Management Committee comprised of a subset of members of the executive team. Regarding modern slavery this committee will assist the Stryker Australia Board in fulfilling its modern slavery responsibilities and will consider and provide management oversight of Stryker Australia's modern slavery risks, actions to manage these risks and drive continuous improvement.

Stryker Australia also invested in a new ESG Manager role to support modern slavery risk management.

## Supply chain

### Suppliers

#### Stryker

Our supply chain comprises several tens of thousands of suppliers serving operations across our specialty business segments around the globe. Stryker's supplier network is a critical component of our value chain and is centered on engagement with suppliers who share in Stryker's mission and values. We seek and support strong relationships with a diverse group of suppliers who operate ethically and lawfully with an emphasis on accountability for their people and performance.

Our supply chain consists of direct and indirect suppliers. Direct suppliers are those which provide anything which directly relates to the manufacture of Stryker products. Indirect suppliers are those that are used outside of the product manufacturing process. Our direct and indirect supply base consists of suppliers located primarily within North America and Europe.

#### Stryker Australia

Stryker's Australia's primary direct supplier is Stryker and its related entities. In addition, Stryker Australia procures goods and services from indirect suppliers, such as office related goods and services, professional services, transportation and freight, and travel and accommodation.

### Supply chain standards

#### Stryker and Stryker Australia

Our [Position on Human Rights](#) and [Supplier Code of Conduct](#) outline our expectations for our suppliers. Violations of applicable laws, the use of child and compulsory labor, forced labor and human trafficking, and unsafe or hazardous working conditions are strictly prohibited. Strict adherence to the Supplier Code of Conduct is required for any supplier doing business with us and Stryker enforces that adherence through contractual arrangements with our suppliers.

Stryker requires that our suppliers maintain a management system designed to ensure compliance with the principles set forth in the Supplier Code of Conduct and all applicable laws, including:

- conduct appropriate due diligence,
- 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
- investigate and take corrective action on any complaints.

## Assessing and addressing risk

### Human rights and modern slavery risks

#### Stryker

Based on publicly available research, such as the Walk Free Foundation's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, Stryker is aware that manufacturing is generally considered at a higher risk of adverse human rights impacts. Working conditions in factories and manufacturing sites and the procurement of certain raw materials can elevate the level of risk in the supply chain.

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, some of these industries are known to be at higher risk based on where the work occurs, or incorporate higher risk materials within their extended supply chains. Based on Stryker's assessment of its supply chain and location of our suppliers, Stryker considers the risks associated with these industries to be low.

As members of the Responsible Minerals Initiative and in line with regulatory requirements, Stryker maintains a Conflict Minerals Policy, conducts reasonable country of origin diligence, and requires its direct suppliers to conduct supporting due diligence within their supply chains specific to the responsible sourcing of tin, tungsten, tantalum and gold. Stryker files an annual form SD and Conflict Minerals Report with the U.S. Securities and Exchange Commission which further details these efforts and can be found [here](#).

#### Stryker Australia

Based on publicly available research by organisations such as Walk Free, Stryker Australia recognises there is an elevated risk of forced labour in certain countries and industries. In Stryker Australia's indirect supply chain, this includes the cleaning industry. However, based on Stryker Australia's assessment of its supply chain, Stryker Australia considers this risk to be low.

### Due diligence in the business and supply chain

#### Stryker

We perform evaluations to identify suppliers that may inherently be at higher risk for human rights related issues based on their industry and/or region where they operate. The results of these activities drive our engagement with suppliers on targeted performance assessments.

We engage the identified in-scope suppliers in performance assessments through recognized third-party platforms that focus on policies, governance, key performance indicators and other evidence of integrated processes addressing human rights, environmental, ethical and sustainable procurement risks. In 2021, we set a goal to engage 85 percent of our direct suppliers (by spend) in environmental, human rights and ethical performance by 2027. As of December 31, 2024, we assessed suppliers covering 70% of our 2024 direct spend, keeping us on track to meet our 2027 target. The completed performance assessments identified opportunities for continued supplier development but did not result in findings that required immediate intervention.

The assessment results are integrated into supplier risk scores which are considered in risk identification and mitigation activities, procurement decisions and supplier business reviews. In 2024, procurement team members who manage in-scope suppliers received training on engaging with suppliers on ESG topics.

In addition to third-party assessments, we use technology to continuously monitor news and other open data sources for our direct suppliers, helping us to quickly identify potential risks or events, including those relating to human rights, forced labor and human trafficking.

### Stryker Australia

Stryker Australia's indirect procurement sourcing template and contract templates request that suppliers acknowledge and comply with the Stryker Supplier Code of Conduct and Modern Slavery clause. In 2024, this approach was strengthened by updating Stryker Australia's procurement sourcing tool to include these requirements. In 2024 there were 11 requests for proposal that utilised these templates and procurement sourcing tool with these provisions. This included suppliers from a range of industries including real estate services, building construction and repair, copy services, courier services, warehouse services, architecture and design, information technology and consulting services.

Stryker Australia also updated the distribution and agent contract templates for indirect channels to include a requirement to comply with a modern slavery clause. This is being progressively rolled out as contracts are established or renewed.

In 2024, we completed a review that commenced in 2023 on a sample of indirect Stryker Australia suppliers. The review found that Stryker Australia's indirect suppliers were low risk, however there a number of higher risk industries identified in the sample including the cleaning industry, freight and security services.

## Training and education

### Stryker and Stryker Australia

Throughout the year, we focused on awareness and integration of the Code of Conduct, which included employee training and targeted communication campaigns. Stryker requires employees to review and certify their compliance with the Code of Conduct on an annual basis. In 2024, 100% of Stryker and Stryker Australia employees completed training on the Code of Conduct when due.



Stryker's direct procurement employees also complete annual training focused on understanding the covered topics in the Supplier Code of Conduct and assisting suppliers in meeting their obligations under the Supplier Code. In 2024, 100% of Stryker required employees completed this training. In Stryker Australia this training was deployed to indirect procurement managers and 100% of Stryker Australia employees completed this training when due.

In addition to the Code of Conduct certification and Supplier Code training, our procurement and supplier quality employees are required to complete annual training focused on the prevention of human rights abuses in our supply chain. This training focuses on the forms of human rights abuse including modern slavery, prevalence, risk factors, identification, and reporting mechanisms with the expectation that procurement personnel monitor Stryker's suppliers and are vigilant during any visits to a supplier facility. In 2024, 100% of Stryker required employees completed this training. In Stryker Australia this training was deployed to indirect procurement managers and all purchase order approvers, ie individuals responsible or approving orders placed with Stryker Australia's suppliers. In 2024, 100% of required Stryker Australia employees completed the training.

In 2024, Stryker Australia also used an executive leadership communication to recognise Human Rights Day and raise awareness on Stryker and Stryker Australia's approach to manage modern slavery risk.

## **Reporting**

### **Stryker and Stryker Australia**

In addition to normal reporting lines and methods, Stryker has a global Ethics Hotline which allows anyone including employees and non-employees, suppliers and their employees, to report suspected improper, unethical or illegal conduct, misconduct and other concerns, including any violations of human rights, via telephone, email or internet submission. Reports can be made anonymously, and the identity of individuals making or involved in a report will be protected, in accordance with local law. All submitted reports are analyzed and routed to the appropriate persons within Stryker for review, assessment and, if appropriate, investigation as part of our formal grievance process. This hotline is communicated and available to Stryker employees through internal training, to our suppliers through our Supplier Code of Conduct, and is accessible publicly on Stryker's website. Stryker's Ethics Hotline can be found at [www.ethicshotline.stryker.com](http://www.ethicshotline.stryker.com).

Stryker does not tolerate any form of retaliation against any individual who reports or participates in the investigation of any suspected unlawful conduct, including conduct that violates our position on human rights. Our suppliers are required to provide a complaint mechanism, free of threat of reprisal, intimidation or harassment, for workers to report workplace grievances and violations. We continuously use company-wide communications and team meetings to reinforce key messages from the Code of Conduct, in particular the importance of speaking up and non-retaliation. In September 2024, we rolled-out a specific Speak Up campaign through our network of Compliance Officers and Compliance Champions, investing in people manager workshops focused on Speak Up channels and the risk of retaliation.

## Effectiveness

### **Stryker**

Stryker continually evaluates the effectiveness of its human rights risks assessment and management processes to identify new factors and methods that can be applied. Management periodically reviews the actions being taken to assess the risk of human rights abuse in our supply chain. We listen and respond to concerns raised by our customers and stakeholders on a wide range of issues.

We provide human rights training for key individuals, record the completion rates of this training and assess employees on their comprehension as part of that training. We are engaging with our supply chain policies and practices and enhancing and evolving them as needs arise. Lastly, we have a process to work with our suppliers to drive progress on improvement opportunities when identified through our assessments.

### **Stryker Australia**

Further strengthening our ability to assess the effectiveness of actions, key responsibilities of the Climate and Sustainability Management Committee is to support the effective management of, and actions relating to, mitigating modern slavery, and to provide strategic oversight of modern slavery actions to manage risk, opportunities and drive continuous improvement.

## Consultation

During the reporting period Stryker Australia owned two non-trading subsidiaries, Tornier Pty Ltd (Tornier) and Vocera Communications Pty Ltd (Vocera). During the Reporting Period, Tornier was deregistered on 20 April 2024 and Vocera is in the process of being liquidated. Therefore, the requirement to consult with any owned or controlled entities does not apply.

## Progress and a focus on continuous improvement

### Stryker Australia

Stryker Australia continues to strengthen local practices to further enhance Stryker's approach to respect and safeguard human rights, including modern slavery. New actions implemented by Stryker Australia in the reporting period are outlined below:

Area	Actions
Governance	Established a Climate and Sustainability Management Committee.
Governance	Created a new ESG Manager role to support Modern Slavery risk management.
Assessing and addressing risk – Due diligence in the business and supply chain	Updated procurement sourcing tool to include a requirement for suppliers to acknowledge and comply with the Stryker Supplier Code of Conduct and Modern Slavery clause.
Assessing and addressing risk – Due diligence in the business and supply chain	Updated distribution and agent contract templates for indirect channels to include a requirement that they comply with a modern slavery clause. This is being progressively rolled out as contracts are established or renewed.
Assessing and addressing risk – Due diligence in the business and supply chain	A review on a sample of indirect suppliers was completed in 2024 that commenced review in 2023.
Assessing and addressing risk – Training and education	Provided an executive leadership communication recognising Human Rights Day and raising awareness on Stryker and Stryker Australia's approach to manage modern slavery risk.

Last updated: 16 June 2025

This statement was approved by the Stryker Australia Board of Directors on 13 June 2025.



**Maurice Ben-Mayor**  
**Chair of the Board**  
**Stryker Australia Pty Ltd**