

# Fighting Against Forced Labour and Child Labour in Supply Chains Act Disclosure

Dear Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs:

Under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (The Act), certain companies manufacturing or selling products in Canada are required to disclose their efforts over the previous fiscal year to address the issues of forced labour and child labour. Zimmer Biomet Canada, Inc., ORTHOSoft ULC and Zimmer, Inc. (collectively, “Zimmer Biomet”) have jointly prepared this report as part of their obligations under The Act, covering their efforts over the 2025 fiscal year, thereby allowing consumers to make more informed choices regarding the products they buy and the companies they choose to support.

Zimmer Biomet strives to achieve and maintain the highest possible standards of corporate integrity and ethical behavior. Zimmer Biomet takes the issues of forced labour and child labour very seriously and will continue doing its part by responsibly managing its supply chains in an effort to eradicate forced labour and child labour. Zimmer Biomet makes the following disclosures as outlined in The Act:

- 1. Scope and Structure.** As a manufacturer, supplier and seller of orthopaedic implants and associated technologies, Zimmer Biomet operates within the healthcare sector and maintains two Canadian-based businesses: **Zimmer Biomet Canada, Inc.** (BN105791768), headquartered in ONTARIO, imports goods manufactured both inside and outside Canada, which it then sells to 3<sup>rd</sup> parties within Canada (principally Canadian hospitals); and **Zimmer CAS/ORTHOSoft ULC** (BN1206497510), headquartered in QUEBEC, produces goods (robotics and technology platforms used in orthopaedic surgery) that it sells inside and outside Canada. All of Zimmer Biomet Canada, Inc.’s and Zimmer CAS/ORTHOSoft ULC’s intra-company transactions are within the ownership chain of a single foreign entity, **Zimmer, Inc.**, headquartered in the USA. Accordingly, for the purposes of this report, Zimmer, Inc., Zimmer Biomet Canada, Inc. and Zimmer CAS/ORTHOSoft ULC are considered entities under The Act. This report is submitted as a joint report for these three entities.
- 2. Identification of Risk of Forced Labour or Child Labour.** Zimmer Biomet has identified an elevated risk of forced labour or child labour associated with the locations of some of its activities, operations or factories, in particular those situated high-risk regions and countries are determined based on four internationally recognized benchmarks: UNICEF, The Responsible Sourcing Tool, The International Labor Organization (ILO) and the U.S. Department of State. Additionally, the orthopaedic implants that Zimmer Biomet manufacturers comprise raw materials that are sourced from mining and mineral extraction activities, introducing an elevated risk of the use of forced labour or child labour.

**Policies and Due Diligence with Respect to Child Labour and Forced Labour.** Zimmer Biomet expects that its suppliers will conduct their businesses in a lawful manner and in compliance with its own high standards of integrity and ethics. As a first step Zimmer Biomet has established a Supplier Code of Conduct which is distributed to all of its suppliers and is available on Zimmer Biomet’s public website:

<https://www.zimmerbiomet.com/content/dam/zb-corporate/en/suppliers/global-and-nam/Zimmer-Biomet-Code-of-Supplier-Conduct.pdf>

This Code of Conduct specifically describes Zimmer Biomet’s expectation that its suppliers and their sub-contractors and suppliers do not utilize child labour or forced labour (page 2). Note that in its Supplier Code of Conduct and other policies, while Zimmer Biomet specifically uses the term “child labour” it does not use the term “forced labour”; however, in aggregate it believes the policies and standards as laid out under the “Standards of Employment” section of its Supplier Code of Conduct comprehensively address the practices that, in aggregate, characterize forced

labour. (For example, see the referenced policies specific to Slavery, Wages & Benefits, Working Hours, and Immigration).

Zimmer Biomet regularly evaluates its suppliers and in 2025 implemented an enhanced due diligence process for suppliers associated with higher-risk jurisdictions or activities. This initiative focuses on collecting and evaluating data from suppliers operating in regions identified as high-risk, ensuring that our global supply chain upholds the highest standards of social responsibility. Social assessments are conducted as formal evaluations of a supplier's policies, practices, and alignment with international ethical standards. These assessments assess compliance with our Code of Conduct and examine the supplier's impact on labour conditions, community well-being, and broader societal outcomes in the defined high-risk regions. Assessments are conducted on a three-year cycle to ensure ongoing compliance and alignment with social responsibility standards. In accordance with our Social Responsibility Assessments and Audits Policy requiring completion of a Social Responsibility Supplier Assessment for all new suppliers and reassessments of existing suppliers, fifty (50) supplier assessments were conducted in 2025, and no findings were identified. Accordingly, no on-site social responsibility audits were triggered by the assessment process.

Supplier assessments do not exclusively or specifically target forced labour or child labour; however, numerous of Zimmer Biomet's routine business practices support its position prohibiting forced labour and child labour. These include:

- (1) An annual Conflict Minerals supplier survey (see 2025 update below) to help identify where elevated risks of child labour or forced labour may exist due to the nature of Conflict Minerals and their extraction;

Between January 1 and December 31, 2025, Zimmer Biomet completed an audit of suppliers with metals in their product that *may* be sourced from the Democratic Republic of the Congo and surrounding countries. Only 39 (13%) of 293 respondents indicated that their production processes or supply chains use or intentionally add 3TG metals sourced from covered countries. This represents a new low level – down from 14% in 2024 – and a positive step in Zimmer Biomet's ongoing efforts to eliminate the use of forced labour and child labour across our expanding supply chain.

- (2) Supplier certification, by acceptance of the "Zimmer Biomet Purchase Order Terms and Conditions," that the materials incorporated into the supplier's products comply with the laws of the country or countries in which they are doing business;

- (3) Various other supplier agreements and assessments that reinforce Zimmer Biomet's high standards of integrity and ethics, including Supplier Quality Agreements; Long-term Agreements with Key Suppliers (in an effort to bias relationships towards trusted suppliers who are known to uphold Zimmer Biomet standards); and the future and planned UFLPA China supplier review.

The Company takes a number of steps with respect to verification of its supply chain and certification of materials to ensure suppliers are operating in an ethical manner, including the following:

- A. **Verification** – Zimmer Biomet expects that its suppliers will conduct their businesses in a lawful manner and in compliance with high standards of integrity and ethics. To establish guidelines for such standards, Zimmer Biomet has established a Code of Supplier Conduct.

Zimmer Biomet suppliers are further expected to take reasonable and necessary steps to help ensure that their sub-contractors and sub-suppliers conduct business in compliance with the Code of Supplier Conduct. Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with Zimmer Biomet's Code of

Supplier Conduct, to maintain necessary records and documentation to demonstrate their compliance with the Code of Supplier Conduct, and to report noncompliance or concerns regarding questionable behaviour to their Zimmer Biomet Sourcing representative or via the Zimmer Biomet Compliance Hotline (Speak Up Hotline). In the Code of Supplier Conduct, child labour is specifically prohibited. If a supplier is found to be in violation of the Code of Supplier Conduct, Zimmer Biomet will take prompt, remedial measures to address the violation. Zimmer Biomet reserves the right to terminate its relationship with any supplier for failure to comply with the Code of Supplier Conduct.

- B. Supplier Assessments and Audits** – Zimmer Biomet continues its practice of monitoring and auditing its suppliers throughout its global supply chains and has implemented a risk-based approach in conducting periodic supplier assessments and audits to evaluate compliance with prohibitions against child labour in supply chains. Those activities focus on collecting and evaluating data from suppliers operating in regions identified as high-risk, ensuring that our global supply chain upholds the highest standards of social responsibility. Social assessments are conducted as formal evaluations of a supplier's policies, practices, and alignment with international ethical standards. These assessments evaluate compliance with our Code of Conduct and examine the supplier's impact on labour conditions, community well-being, and broader societal outcomes. Where a supplier holds a qualifying third-party certificate (e.g. Sedex SMETA, EcoVadis) that covers the defined Zimmer Biomet Social Responsibility Assessment or Audit requirements, such third-party certification may be accepted in lieu of a Zimmer Biomet-conducted assessment or audit. In circumstances where an on-site audit cannot be completed due to unprecedented events such as country or company travel restrictions (e.g. pandemic or high-risk conflict region), a virtual or remote audit conducted via video conference may be used as an alternative.

The scope and frequency of supplier assessments are reviewed annually and determined based on risk classification criteria outlined in our Social Responsibility Assessments and Audits Policy. These criteria include factors such as geographic location, industry-specific risks, and historical supplier performance. This risk-based approach enables us to prioritize suppliers for evaluation and auditing in a focused and efficient manner.

The assessment process consists of two phases: Initial Self-Assessment where suppliers complete a sustainability self-assessment questionnaire designed to evaluate alignment with our ethical standards, regulatory requirements, and environmental and social expectations. On-Site Audit if potential risks or non-conformities are identified during the self-assessment review, the supplier advances to the second phase. This involves a comprehensive, on-site sustainability audit conducted to verify compliance and assess areas for improvement. This structured process supports proactive risk mitigation and ensures accountability throughout our supply chain.

- C. Certifications** – Zimmer Biomet requires its suppliers to represent and certify, by acceptance of the Company's purchase order terms and conditions, that in providing goods and services under the purchase order, the supplier has complied and will comply with all applicable federal, foreign, state and local laws, rules and regulations, including, without limitation, all anti-slavery, anti-child labour and anti-human trafficking laws.
- D. Accountability** – Zimmer Biomet has established a Code of Business Conduct and Ethics, which applies to all Zimmer Biomet personnel, including officers, directors and employees (including full-time, part-time temporary and contract employees) (collectively, "Team Members"). Zimmer Biomet expects its business partners and contractors to share the general principles stated in the Code of Business Conduct and Ethics. These general principles require Zimmer Biomet Team Members to comply with all applicable laws and regulations, including but not limited to those relating to child labour. The Zimmer Biomet Code of Business Conduct and Ethics specifically calls out child labour, forced labour

(slavery) and human trafficking. The Code of Business Conduct and Ethics explains that if a Team Member needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should consult with or report the matter to his or her manager, supervisor or the Compliance Office or via the Compliance Hotline (Speak Up Hotline). All reports of alleged violations will be investigated by Zimmer Biomet. Disregard or deliberate ignorance of the law, failure to report known or potential violations and/or failure to cooperate in an investigation will not be tolerated and may lead to disciplinary action, including termination of employment.

- E. **Training** – All Team Members are trained annually on the Code of Business Conduct and Ethics. The Code of Business Conduct and Ethics requires Team Members to comply with all applicable laws and regulations, including but not limited to those relating to child labour. Team Members who have direct responsibility for supplier management are also trained on the Zimmer Biomet Code of Supplier Conduct. The Code of Supplier Conduct informs suppliers that Zimmer Biomet will take prompt, remedial measures to address any violations.

Zimmer Biomet strives to continuously improve its programs and practices to ensure compliance with applicable laws and regulations and the Company's high ethical standards, and to meet the expectations of its customers, shareholders, associates and other stakeholders.

3. **Remediation.** In the Supplier Code of Conduct, child labour and forced labour are called out as activities for which Zimmer Biomet has a zero-tolerance policy. If a supplier is found to be in violation of the Supplier Code of Conduct, Zimmer Biomet will take prompt, remedial measures to address the violation. Suppliers are expected to promptly take corrective action to address any deficiencies identified and Zimmer Biomet reserves the right to terminate its relationship with any supplier for failure to comply with this Supplier Code of Conduct.

Zimmer Biomet recognizes that child labour and forced labour are serious global issues and that leaders in industry need to continue to develop and implement policies and procedures that better identify, remediate, and continuously monitor identified risks. To date Zimmer Biomet's actions on these initiatives include regular reviews and audits of its policies and procedures related to child labour and forced labour, as well as tracking relevant performance indicators, such as levels of employee awareness, number of cases reported and solved through grievance mechanisms, and number of contracts with anti-child labour and anti-forced labour clauses.

4. **Training.** Zimmer Biomet has established an Employee Code of Business Conduct which applies to all Zimmer Biomet personnel, including employees and board members (collectively, "Employees"). Zimmer Biomet expects its business partners and contractors to share the general principles stated in the Code of Business Conduct. These general principles require Zimmer Biomet Employees to comply with all applicable laws and regulations, including but not limited to those relating to child labour and forced labour. The Zimmer Biomet Employee Code of Business Conduct specifically calls out Child Labor, Slavery, and Human Trafficking. The Code of Business Conduct explains that if an Employee needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should consult with or report the matter to their manager, supervisor or the Compliance Office or via the Compliance Hotline, depending on the specific circumstances. All reports of alleged violations will be investigated by Zimmer Biomet. Disregard or deliberate ignorance of the law is not tolerated and may lead to disciplinary action.

All Employees are trained to the Employee Code of Business Conduct. Training is tracked and managed via iLearn, and additional curriculum requirements specific to the annual Conflict Mineral Supplier Survey are assigned to appropriate Employees.

5. **Accountability.** Zimmer Biomet assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chain through its Supplier Code of

Conduct; its supplier audit, monitoring and remediation practices; and through monitoring of its Employees' compliance with their training requirements.

Sincerely,

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Luke Windisch  
VP & GM, Zimmer Biomet Canada, Inc.

30 June 2026  
Date

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Louis-Philippe Amiot  
VP & GM, Zimmer CAS/ORTHOSoft ULC

30 June 2026  
Date

Signed by:  
  
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Matthew St. Louis  
VP, Associate Counsel and Assistant Secretary  
Zimmer, Inc.

30 June 2026  
Date