

Ethical Business and Modern Slavery Statement

In accordance with the UK Modern Slavery Act 2015 and UK regulatory expectations

Acandis GmbH
Theodor Fahrner Str. 6
75177 Pforzheim, Germany

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1. Purpose and scope

This Ethical Business and Modern Slavery Statement describes Acandis GmbH's commitment to ethical conduct, integrity, transparency and respect for human rights.

The statement is intended to meet the requirements of Section 54 of the UK Modern Slavery Act 2015 and to provide transparency regarding how ethical, social and human-rights-related considerations are addressed within Acandis GmbH and its business relationships. It may also serve to support information requests by UK regulatory authorities, including the Medicines and Healthcare products Regulatory Agency (MHRA), and may be referenced in the context of UK tenders and business partnerships.

This statement applies to Acandis GmbH and, where relevant, its interactions with suppliers, partners and service providers. It reflects current practices at the time of publication and is proportionate to the size, structure and risk profile of the company.

2. Organisation overview

Acandis GmbH is a medical technology company headquartered in Pforzheim, Germany, specialising in the development and manufacture of innovative products for the treatment of neurovascular diseases. The company operates internationally and collaborates with distributors, suppliers and service providers across multiple regions.

Acandis GmbH recognises its responsibility to conduct business in a lawful, ethical and socially responsible manner and to meet applicable regulatory, quality and compliance requirements in all jurisdictions in which it operates

3. Integrity, compliance and ethical governance

Integrity, compliance and ethical behaviour form the foundation of Acandis GmbH's business activities. The company has established documented policies and internal requirements to promote compliance with applicable laws and regulations and to communicate clear expectations regarding ethical conduct.

Responsibilities for compliance and ethical governance are defined within the organisation and supported through management oversight and established internal processes. Ethical conduct, lawful behaviour and respect for applicable regulations are integral to the company's quality and compliance framework

4. Whistleblower policy and protection

Acandis GmbH recognises the importance of whistleblowers in identifying potential ethical misconduct, non-compliance or violations of internal policies or legal requirements.

The company has implemented a whistleblower mechanism that allows employees and other relevant stakeholders to report concerns confidentially and, where applicable, anonymously. Reports can be submitted without fear of retaliation, discrimination or disadvantage.

Reported concerns are reviewed and addressed through established internal procedures. The confidentiality of whistleblowers is respected to the extent legally permissible, and appropriate measures are taken where substantiated issues are identified

5. Transparency and communication

Acandis GmbH is committed to transparent and responsible communication within the organisation and with relevant external stakeholders. Transparency supports trust, accountability and compliance with regulatory expectations.

Employees are encouraged to raise concerns, ask questions and seek clarification regarding ethical or compliance-related matters. Ethical expectations and compliance requirements are communicated through documented policies, internal communication and management engagement.

6. Ethics in clinical trials

Ethical conduct is regarded as a fundamental requirement in all clinical activities conducted or sponsored by Acandis GmbH. Clinical trials are performed in accordance

with internationally recognised ethical and regulatory frameworks, including the Declaration of Helsinki and applicable Good Clinical Practice (GCP) guidelines.

All clinical study protocols are subject to appropriate review by independent ethics committees, and the rights, safety and wellbeing of study participants are respected at all times. Acandis GmbH is committed to transparency regarding clinical trial conduct and outcomes, including the communication of study results in an objective and unbiased manner

7. Social responsibility

Acandis GmbH acknowledges its social responsibility and seeks to contribute positively to society beyond its core business activities. The company supports selected charitable and social initiatives, particularly in the areas of health, education and social welfare.

Acandis GmbH values diversity, inclusion and equal opportunity and promotes a respectful working environment based on fairness and mutual respect.

8. Modern Slavery and Human Trafficking Statement

8.1. Commitment

Acandis GmbH is committed to preventing modern slavery and human trafficking in all its business operations and relationships. The company recognises its responsibility to act ethically and with integrity and transparency and to avoid causing or contributing to human rights violations.

Any suspected violation of ethical or legal requirements, including concerns related to forced labour, child labour or human trafficking, may be reported through established internal reporting and whistleblower mechanisms without fear of retaliation.

8.2. Supply chain considerations

Acandis GmbH acknowledges that risks related to modern slavery and human trafficking may arise particularly within global supply chains. Ethical, labour and human-rights-related considerations are therefore addressed through existing supplier management and quality assurance activities in a manner proportionate to the company's size, structure and risk profile.

Supplier-related risks are primarily addressed through:

- consideration of ethical and legal expectations during supplier selection and qualification activities

- inclusion of compliance-related expectations within contractual agreements
- supplier interactions primarily focused on product quality, regulatory compliance and quality system requirements
- review and follow-up of identified concerns within existing organisational and supplier management processes

Where potential concerns related to ethical conduct or labour practices are identified, Acandis GmbH seeks to address them through dialogue and cooperation with the respective business partner. Escalation or further measures may be considered where warranted, depending on the nature and severity of the concern.

Acandis GmbH continues to evaluate whether further formalisation of supplier-related human-rights assessments is appropriate, taking into account regulatory expectations, business developments and proportionality.

8.3. Training and awareness

Acandis GmbH promotes awareness of ethical conduct and human rights through internal communication, documented policies and management oversight. Employees are informed of the company's ethical principles, expectations regarding lawful and responsible behaviour, and the prohibition of forced labour, child labour and human trafficking.

Particular attention is given to raising awareness among employees involved in supplier interaction, procurement and quality-related activities through access to relevant policies, contractual frameworks and periodic management communication. At present, awareness is primarily ensured through policy communication and management briefings rather than through standalone, formally documented training programmes specific to modern slavery.

Formal training records are maintained where required by regulatory or quality management system obligations. Specific standalone training on modern slavery is not currently part of the formal training curriculum.

8.4. Effectiveness and continuous review

Acandis GmbH considers ethical and human-rights-related risks as part of its general management awareness and continuous improvement mindset. Relevant insights arising from business activities, quality management processes or supplier interactions are taken into account where appropriate.

Relevant policies, procedures and controls are reviewed as appropriate to ensure alignment with applicable legal requirements, regulatory expectations (including those of UK authorities and the MHRA) and recognised best practices.

9. Environmental responsibility and sustainability

Acandis GmbH is committed to reducing its environmental impact and supporting sustainable business practices. The company seeks to use resources responsibly, to reduce waste and to integrate environmental considerations into relevant business decisions where feasible.

10. Ethics in business relationships

Acandis GmbH is committed to fair and ethical business practices in all interactions with customers, suppliers, partners and other stakeholders. Long-term relationships based on trust, integrity and mutual respect are regarded as essential to sustainable business success.

The company does not tolerate corruption, bribery or unethical conduct and supports mechanisms for reporting and addressing potential violations.

11. Outlook and commitment

Acandis GmbH recognises that ethical conduct and respect for human rights require ongoing attention and continuous improvement. The company remains committed to strengthening its ethical framework over time, taking into account regulatory developments, stakeholder expectations and business evolution

12. Conclusion

This Ethical Business and Modern Slavery Statement reflects Acandis GmbH's commitment to responsible business conduct, ethical behaviour and respect for human rights. While recognising that ethical governance is an ongoing process, Acandis GmbH strives to act with integrity, transparency and proportionality in all areas of its operations and relationships.


By embedding ethical principles into its business culture and decision-making processes, Acandis GmbH aims to maintain the trust of customers, employees, business partners and regulatory authorities and to contribute to sustainable and responsible healthcare innovation

13. Approval and Authorisation

This Ethical Business and Modern Slavery Statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and has been approved by the management of Acandis GmbH.

This statement reflects the organisation's policies, practices and approach to ethical conduct, human rights and the prevention of modern slavery and human trafficking as at the date of approval.

Signiert von Andreas Schüssler

 *Andreas Schüssler* | Ich genehmige dieses Dokument
16/4/2026 | 15:18 MESZ

Approved by (Signature):
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Name: Dr. Andreas Schüssler

Function / Title: CEO, Acandis GmbH

Date: 31.03.2026