

## RAYSEARCH LABORATORIES AB (PUBL) MODERN SLAVERY TRANSPARENCY STATEMENT

This statement is made pursuant to the requirements of the UK Modern Slavery Act of 2015 and covers RaySearch Laboratories AB along with its subsidiaries (collectively "RaySearch"). RaySearch takes its responsibilities very seriously. We strive to work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same high standards from those businesses with which we work. Consequently, we are committed to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in our business or supply chains.

### About RaySearch

RaySearch is an international medical technology company, run from Sweden, that develops software used in the radiation therapy of cancer.

We have been working with leading cancer treatment centres around the world since 2000 to enable better care for patients by making oncology software faster, easier and more flexible. RaySearch is a trusted and reliable worldwide oncology software provider and tens of thousands of cancer treatments are conducted each year using RaySearch's algorithms and software products.

In order to maintain our position in the field of cancer treatment and maintain a sustainable business, we think that it is important to ensure that we make ethical decisions. RaySearch has various policies that demonstrate our commitment to conducting business in an ethical and transparent manner. In particular, we have the following:

**Code of Conduct** – our Code of Conduct has been devised to try and maintain our core values: trustworthiness, high quality and innovation. We want our employees to have high ethical standards, promote safe working conditions and act responsibly. We raise awareness of our values so that we act with integrity and the highest ethical standards. The Code of Conduct, which is divided into a section on business ethics and a section on human rights and labour conditions, outlines minimum requirements that our employees have to comply with, in addition to applicable domestic law, regulations and industry standards.

**Whistleblowing Policy** – offers a possibility for employees to confidentially report complaints or concerns where RaySearch's normal reporting channels are impossible or inappropriate to use. It is used to report concerns about serious wrongdoings, for example suspected violations of RaySearch's Code of Conduct, other compliance policies or suspected violations of law or regulations that govern RaySearch's operations.

**Business Partner Procedure** – to ensure that our distributors, regulatory and other representatives, sub-consultants and agents (business partners) share our values and comply with the necessary laws and regulations, we undertake background checks on business partners located in countries scoring 1-70 in Transparency International's CPI Index and require them to confirm that they do comply with our Code of Conduct. These checks include an assessment of the risk of bribery, corruption and money laundering.

---

### RaySearch Laboratories AB (publ)

Reg. no. 556322-6157  
P.O. Box 3297  
SE-103 65 Stockholm  
Sweden

Visitors: Sveavägen 44  
info@raysearchlabs.com  
www.raysearchlabs.com  
Phone +46 (0)8 510 530 00

The registered office  
of the Board of Directors  
is in the Municipality  
of Stockholm.

### **RaySearch's supply chain**

As a software business that does not manufacture any physical goods, RaySearch's supply chain is limited and low risk. The supply chains that we use, which all come from the European Union, include suppliers of goods and services in the following areas: hardware that is then provided to our customers, accounting software systems, other IT services, office supplies and services, events organizers, and consultant services.

### **RaySearch's approach to tackling modern slavery**

RaySearch is committed to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in the business or in its supply chains. It is not, nor has it ever been, aware of any actual or suspected slavery or human trafficking within its own business or the businesses of its suppliers. To achieve our commitment to tackling modern slavery, we have taken or are taking the following steps:

- Our Code of Conduct specifically addresses the issues regarding modern slavery and human trafficking, and compliance with the Modern Slavery Act 2015 and other international laws and standards. All employees are asked to review the Code of Conduct when they join and are then trained each year in our Annual Compliance Training that includes the Code of Conduct and other compliance policies.
- The Code of Conduct includes, amongst other things: (i) our zero-tolerance approach to modern slavery; (ii) the need to comply with the policy and the procedure for reporting any concerns; and (iii) the consequences of a breach of the policy.
- Employees are encouraged to report concerns they may have, including suspected violations of RaySearch's Code of Conduct and the zero-tolerance to modern slavery, and our whistleblower procedure offers a possibility for employees to confidentially report any such concerns as well as guarantees protection from any retaliation actions.
- Third Parties (suppliers and distributors, regulatory and other representatives, sub-consultants, and agents) are, as relevant, contractually required (see below) to acknowledge their awareness of the Code of Conduct, which emphasises our commitment to ensuring that slavery and human trafficking are not taking place in our supply chains.
- Introduction of contractual provisions relating to modern slavery for Third Parties including a requirement that the Third Party and its subcontractors comply with all applicable anti-slavery laws, including the Modern Slavery Act and an obligation to provide us with their own slavery and human trafficking report upon request.
- An assessment of our existing supply chains and continued consideration of suppliers that we use in the future.

We continue to review our policies and processes in an effort to ensure the highest standards in our business and our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our transparency in supply chain statement for the financial year ending 31 December 2020.

On behalf of RaySearch Laboratories AB (publ)

  
\_\_\_\_\_  
Johan Löf  
Director

---

#### **RaySearch Laboratories AB (publ)**

Reg. no. 556322-6157  
P.O. Box 3297  
SE-103 65 Stockholm  
Sweden

Visitors: Sveavägen 44  
info@raysearchlabs.com  
www.raysearchlabs.com  
Phone +46 (0)8 510 530 00

The registered office  
of the Board of Directors  
is in the Municipality  
of Stockholm.