

ONWARD<sup>®</sup>  
MEDICAL



Sustainability  
Summary  
**2024**

ONWARD  
Medical N.V.

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# About this Summary

Welcome to ONWARD Medical’s 2024 sustainability summary, published April 28, 2025, which describes our priorities, approach and performance for the year ended 31 December 2024. This summary covers our full business, including more than 100 employees spread across our headquarters in Eindhoven, the Netherlands; our science and engineering center in Lausanne, Switzerland; and our field sales/service and clinical organization in the US.

In producing this summary, we reviewed relevant external reporting standards with a view toward applying such standards in the future.

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# A Message from our CEO

Dear Stakeholders,

At ONWARD, innovation and sustainability are part of our mission. As we develop breakthrough therapies to help people with spinal cord injury (SCI) and other movement disabilities recover movement and other critical functions, we are committed to ensuring our progress is accompanied by sustainable and responsible business practices.

People with spinal cord injury have been without viable therapeutic options for decades, and last year we changed that reality. We received authorization from the US Food and Drug Administration (FDA) for the ARC<sup>EX</sup> System in December 2024. The first and only FDA approved technology indicated to improve hand strength and sensation in people with chronic SCI, the ARC<sup>EX</sup> System is now commercially available in the United States (US). Notably, TIME Magazine named ARC<sup>EX</sup> one of its “Best Inventions” of 2024.

Now that we are a commercial-stage company, we have an even greater responsibility to integrate sustainable practices into the design, development, manufacture and sale of our devices and therapies. As we pioneer new treatments for SCI, we are demonstrating that medical innovation and corporate responsibility can go hand in hand.

In 2024, we were awarded a Silver medal by EcoVadis, the world’s largest provider of business sustainability ratings. This placed us in the top 15% of the companies assessed in the past 12 months. Though we are an emerging company and our resources are primarily directed toward innovation and commercialization, I am proud that our sustainability efforts have been recognized.

Our team’s unwavering commitment to environmental stewardship mirrors our dedication to medical innovation. By embedding sustainability into our operations - from renewable energy use to responsible supply chain management - we are building an organization that creates value for both patients and our planet. This dual focus on breakthrough therapies and environmental responsibility helps us attract exceptional talent who share our vision of improving lives while protecting natural resources for future generations.

We have set ambitious goals for 2025 and beyond and aim to continue improving our sustainability performance and embedding sustainability practices in daily operations.

Stay updated on our progress by visiting our website at [www.onwd.com](http://www.onwd.com), or by following ONWARD Medical on social media.



**Dave Marver, Chief Executive Officer**

# Our Impact

Founded in 2015, ONWARD Medical seeks to solve a significant unmet medical need by creating therapies to restore movement, function, and independence in people with spinal cord injuries (SCI) and other movement disabilities.

Spinal cord injury is estimated to affect 9 million people worldwide, primarily as a result of accidents and falls, and disproportionately affecting young men. While most people associate SCI with paralysis and loss of sensation, there are often accompanying challenges such as infection, incontinence, loss of sexual function and blood pressure instability. As a result, quality of life following spinal cord injury can be poor for injured people and their caregivers. SCI is also expensive due to healthcare costs, loss of earnings, and the need for outside assistance to support activities of daily living.

ONWARD ARC Therapy™ applies targeted, programmed electrical stimulation of the spinal cord to restore movement and function after SCI. The stimulation can be delivered by an external platform, called ARC<sup>EX</sup>, an implantable platform, called ARC<sup>IM</sup>, or through our ARC<sup>IM</sup> platform paired with an implanted brain-computer Interface (BCI) to form ARC<sup>BCI</sup>. ARC<sup>BCI</sup> has the potential to enable the restoration of thought-driven movement via our wireless ONWARD DigitalBridge™.

In 2024, our focus has expanded from completing successful clinical trials and seeking regulatory approval for our devices to include commercial operations following our first FDA authorization in December 2024. While we continue to advance our pipeline including our ARC<sup>IM</sup> and ARC<sup>BCI</sup> technology platforms, we are now focused on successfully introducing ARC<sup>EX</sup> to the US and other global markets.

Please read our **2024 Annual Report** for more details on our technology, clinical evidence, business model, corporate strategy and societal impact. This sustainability summary focuses on our efforts to integrate strong social, environmental and governance practices throughout our company.

# Sustainability Governance

Our Leadership Team is accountable for ensuring the development and implementation of sustainable practices into our operations, with oversight from our Board of Directors.

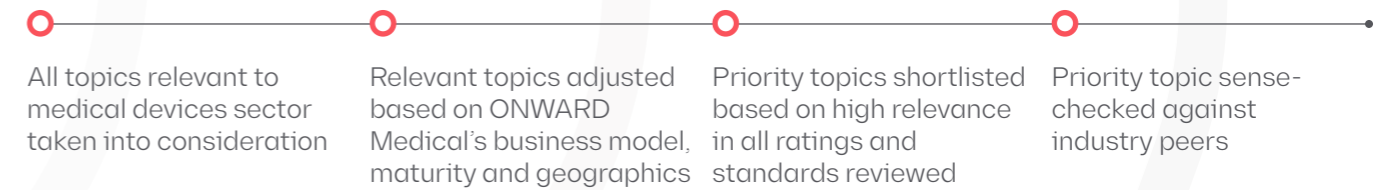
In 2024, sustainability performance was integrated into ONWARD Medical's Executive Director performance and incentive plan eligibility, highlighting our commitment to sustainability.

We continue to demonstrate strong sustainability performance and have made significant improvements, as demonstrated by ONWARD Medical achieving a silver medal from EcoVadis in 2024, placing the company in the top 15% globally for corporate sustainability, out of the companies assessed by EcoVadis in the preceding 12 months. The EcoVadis assessment evaluates 20+ sustainability criteria across four core themes: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. More than 130,000 companies globally have been rated by EcoVadis.



# Our Sustainability Priorities




Over the past year our priorities have not changed and are consistent with those reported in our 2023 Sustainability Summary. To determine our sustainability priorities, we built on sustainability assessments from external agencies and the Sustainability Accounting Standards Board Medical Equipment and Supplies Standard. All inputs were tailored to the medical devices sector, giving us a clear indication of topics of focus, as well as our areas of strength and opportunities to improve:



We identified relevant topics for ONWARD and shortlisted priority topics based on those given highest importance in the aforementioned inputs. We sense-checked our priority topics against those reported by healthcare sector peers, from similar sized companies to sector leaders, and found them to be consistent.



## Our Sustainability Priorities

|  | Social  | Environmental   | Supply Chain   | Governance   |
|--|---|---|--|--|
| <b>Our Principles</b>                                    | Innovating for the underserved<br>Attracting & retaining top talent   | Minimizing our environmental footprint  | Maintaining high ethical standards   | Partnering with patient groups   |
| <b>Our Priorities</b>                                    | <ul style="list-style-type: none"> <li>Access &amp; affordability</li> <li>Product &amp; customer safety</li> <li>Career management</li> </ul>  | <ul style="list-style-type: none"> <li>Environmental management</li> <li>GHG emission reductions</li> <li>Product design &amp; lifecycle</li> </ul>                 | <ul style="list-style-type: none"> <li>Supplier risk management</li> <li>Critical materials</li> </ul>   | <ul style="list-style-type: none"> <li>Anti-bribery &amp; corruption</li> <li>Responsible marketing</li> <li>Privacy and information security</li> </ul> |
| <b>Our support for the Sustainable Development Goals</b> |    |   |    |   |

This sustainability summary covers all our priority topics.

In the future, we intend to refine our assessment by incorporating the views of relevant stakeholders such as:

- People living with SCI and their caregivers
- Patient advocacy groups
- Regulators in the U.S. and Europe, our key markets
- Healthcare payors
- Rehabilitation centers and other healthcare providers
- Current and future employees
- Suppliers and people working in our supply chain
- Investors and ratings agencies

We are committed to engaging in meaningful stakeholder dialogue and have introduced a **Stakeholder Dialogue policy** to ensure our activities in this area are open, transparent and inclusive.



# 2024 Performance Summary

We have established performance indicators to set a baseline for measuring progress against each priority topic. The following pages of this summary provide further explanation of our performance.

## Social

- 0 product recalls
  - 0 warranty claims
  - 8 average hours of mandatory training per employee
  - 76% participation rate in employee surveys
  - 20 nationalities represented in our workforce
- Women at ONWARD Medical represent:
- 38% of our workforce
  - 46% of supervisors and managers<sup>1</sup>
  - 38% of the Leadership Team<sup>2</sup>
  - 38% of Board members
- 0 lost-time work-related injuries

## Environmental

- 90% of purchased electricity from renewable sources<sup>3</sup>
- 0 environmental non-compliances

## Supply Chain

- 100% of new suppliers have answered sustainability questions in our pre-qualification questionnaire since it was introduced in October 2023

## Governance

- 0 cases of bribery or corruption confirmed or suspected within the company
- 0 monetary losses as a result of legal proceedings associated with false marketing claims
- 0 confirmed data privacy breaches during the year
- 0 confirmed information security breaches during the year

<sup>1</sup>Defined as employees with one or more direct reports

<sup>2</sup>Defined as full-time roles within the Company's Leadership Team

<sup>3</sup>Based on data from Lausanne, Switzerland site



# Our Social Impact

We innovate to empower people with spinal cord injury to enjoy life in the ways that matter to them. We work closely with our partners to make our platform widely available and to uphold the highest standards of quality and safety throughout manufacturing and development, including in our clinical trials.

## Access & Affordability

At ONWARD Medical, we believe that everyone deserves access to healthcare, regardless of their location or circumstances. Our mission is to make our innovative therapies widely available to those in need. Recognizing that reimbursement decisions by private and government payers can take several years after regulatory approval, we integrate reimbursement considerations into our product design, gather robust pre- and post-market data, and intend to offer assistance with prior authorization and insurance inquiries designed to qualify for accelerated access pathways. All for the benefit of the spinal cord injury community.

Geographically, we aim to achieve greatest access to our therapies, starting with markets that have the rehabilitation and/or reimbursement infrastructure to support commercialization of ARC Therapy. Our long-term strategy is to expand into other regions with the goal of reaching as many of the estimated 9 million people worldwide with spinal cord injury as possible.

Our ARC<sup>EX</sup> System is currently cleared for in-clinic use during rehabilitation sessions in the US. It is also designed for home use and we anticipate US FDA authorization for home use in 2025. Our close collaboration with rehabilitation professionals ensures seamless integration of ARC<sup>EX</sup> Therapy into clinical workflows. Once approved for home use, ARC<sup>EX</sup> Therapy in the

clinic will serve as a gateway for patients to continue treatment at home as prescribed by rehabilitation professionals, which we expect will increase access for people who live in remote areas and cannot regularly visit a rehabilitation center. We are seeking out reimbursement pathways for people to buy their own device for home use. We will explore partnerships and programs that can increase access to our devices.

## Product & Customer Safety

Ensuring our devices meet the highest levels of quality and safety is a fundamental requirement of our business. We want people with SCI, their caregivers and healthcare providers to have the utmost confidence in ONWARD ARC Therapy.

The development, manufacturing, and marketing of our technology is subject to government regulation. ONWARD partners with regulatory authorities globally to ensure that clinical trials are designed and executed in accordance with their requirements. For more information about ONWARD's clinical and regulatory team and requirements, please refer to the operational review in our 2024 Annual Report.

## Policies & Measures

Our global quality system complies with applicable regulations and standards related to the medical devices industry in the EU and US. We have clear and strict procedures in place to ensure quality and safety at every step, including design and development, product identification and traceability, post-market surveillance, complaints handling, vigilance reporting, handling of adverse events, and product recalls. Our quality management system is ISO 13485 certified.



## Our Social Impact

### Performance

Our ISO 13485-certified quality management system passed its most recent independent audit in December 2024.



Devices were recalled during the year



Warranty claims were made for any device

### Fulfilling Careers

We operate at the forefront of our industry, seeking not only the brightest minds but also those who bring creativity and diverse perspectives to drive true breakthroughs in addition to continuous incremental progress. With our bold vision, pioneering technology, and competitive rewards, we aim to be an employer of choice, and strive to create an inclusive and rewarding culture that promotes well-being and inspires long-term commitment.

### Policies & Measures

Our People & Culture team primarily manages the hiring process through direct recruitment, leveraging our professional network and attracting top talent through employer branding and collaborations with academic institutions. Additionally, we occasionally work with external recruitment firms when needed. Our employee referral program encourages team members to leverage their own networks to introduce candidates who align well with our culture. We offer competitive compensation and benefits, including stock option plans for all employees that act as a long-term incentive.

The ONWARD Code fosters a culture of continuous learning, feedback, and growth, encouraging our employees to embrace challenges, seek feedback with humility, and find fulfillment in overcoming obstacles as they build their skills and careers. We have career pathways for key functions including R&D, clinical, regulatory, and quality to provide a clear route from entry level to senior positions.

Our annual people cycle includes a talent review guide, development conversation guide, and objective-setting guide to support employees and their line managers through the process. Our managers calibrate their team's performance to ensure a fair and consistent approach.

### Performance

In 2024, we introduced several initiatives to gather feedback and foster a positive work environment such as bi-yearly surveys with results analysis done by dedicated workgroups that propose actionable recommendations. In 2024, these surveys had a 76% average participation rate and the results showed that collaboration remains one of our key strengths. We also introduced a new bi-weekly initiative gathering quick insights to monitor employee sentiment more frequently, as well as an anonymous platform allowing employees to share ideas and suggestions freely.

These efforts complement our ongoing improvements to the employee lifecycle experience starting with monthly onboarding programs, and including check-in surveys for new hires at key milestones: after the first week, after one month, and after three months, as well as employee journey interviews and comprehensive offboarding interviews. These measures ensure valuable feedback is collected at every stage of employment, enabling us to refine our practices and enhance organizational performance.

In 2024, we also launched several initiatives to enhance employee well-being and support a healthy work-life balance. These efforts included the establishment of a Zen Zone in our Lausanne office, providing employees with a dedicated space for relaxation and mindfulness. We also continued to offer flexible hybrid working arrangements where possible, enabling employees to better balance their personal and professional commitments.

We introduced a variety of activities and programs to promote well-being, such as well-being challenges, sports events in support of the SCI community, and the dissemination of educational resources during special months and weeks dedicated to mental health awareness and work-life balance. These initiatives reflect our commitment to fostering a positive and supportive work environment for all team members.



## Our Social Impact

We provided mandatory training tailored to people's roles, and additional training linked to people's development plans, such as coaching and access to Udemy, a leading online learning platform offering over 250,000 courses which we provide to all of our employees worldwide.

8

Average hours of mandatory training per employee

76%

Participation rate in employee surveys

## Opportunity and Belonging

Unique backgrounds bring different perspectives, which help foster innovation and generate better business outcomes. Providing equitable workplaces where individual differences are embraced increases our ability to attract top talent.

### Policies & Measures

We value broad representation at all levels of the company, from the Board of Directors to all employees. At ONWARD, we foster a culture that welcomes a range of personal backgrounds, experiences, qualifications, knowledge, abilities, and viewpoints, as well as relevant protections.

To bring this to life, we support an environment where everyone feels respected, valued, and treated fairly. This includes specific actions such as pay gap assessments and measures to promote the hiring and integration of people with disabilities and those from varied backgrounds.

## Performance

20

Nationalities represented in our workforce

Women at ONWARD represent:

- 38% of our workforce
- 46% of supervisors and managers<sup>1</sup>
- 38% of the Leadership Team<sup>2</sup>
- 38% of Board members

## Health, Safety & Working Conditions

Creating a safe, healthy, and equitable work environment is a priority for us. We consider it integral to our social sustainability commitment.

### Policies & Measures

Our employee handbook offers all team members a comprehensive overview of our vision and culture and provides clear guidance on critical operational policies such as nonharassment, accidents and injuries, compensation and benefits, paid time off, and standards of conduct. Our Environment, Health and Safety (EHS) Concept includes controls related to lab access, working with high voltage equipment and hazardous chemicals, and emergency response trainings.



## Our Social Impact

### Child & Forced Labor

Our workforce is composed of highly skilled people with advanced degrees or training, many with graduate or post-graduate educations, and operates in geographies at low risk of child and forced labor (the Netherlands, Switzerland and the US). We will continue to monitor these topics as the business evolves and put in place measures as appropriate.

### Performance

In 2024, we continued the deployment of training on the emergency response procedure. For our science and engineering center in Lausanne this included an evacuation exercise. We also continued our offering of activities centered on mental health and well-being and launched initiatives such as the establishment of a Zen Zone, a dedicated space for relaxation and mindfulness, in our Lausanne office. In 2024, there were no lost-time work-related injuries



Lost-time work-related injuries

<sup>1</sup>Defined as employees with one or more direct reports

<sup>2</sup>Defined as full-time roles within the Company's Leadership Team



# Environmental Management

ONWARD has a limited environmental footprint. In 2024, we manufactured the first ARCEX devices used for commercial sale. These continued to be primarily manufactured by our suppliers. Overall, our aim is to build resource efficiency into the way we operate, so that our business maintains minimal environmental impacts as it grows.

### Policies & Measures

Despite our small footprint, we strive to reduce greenhouse gas emissions by replacing air travel with videoconferencing except for the most pressing business needs, and by encouraging hybrid working that reduces commuting. Our environment, health and safety (EHS) quality plan sets out responsibilities for managing different waste streams in our science and engineering center in Lausanne.

In 2024, we published an updated **Global Environmental Policy** on our website that confirms our commitment to assess and address our environmental impacts as our business evolves.

### Performance

In 2024, we consumed 66.1 MWh of purchased electricity in our Lausanne site, of which 59.5 MWh (90%) was from renewable sources. We plan to develop more detailed carbon accounting and emissions reporting as part of our future sustainability efforts.

We have experienced no non-compliances with environmental legislation to date.

90%

0

Purchased electricity from renewable sources<sup>1</sup> Environmental non-compliances

### Product Design & Lifecycle Management

Device safety and efficacy are core to our mission, guiding our design and development to meet the highest standards. Our device design and development procedure describes the governance, phases, reviews and documentation of our design and development process. We prioritize minimal environmental impact throughout the full life cycle of our products by maximizing local sourcing, usage of efficient manufacturing processes, long service life, responsible material selection, and considering material end of life handling in our product and packaging design. Our dedication to ESG principles not only aligns with regulatory requirements but also reflects our responsibility to safeguard the environment while delivering innovative healthcare solutions.

All our device components are selected in accordance with Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation and the Restriction of Hazardous Substances Directive (RoHS) during the development process.

### Animal Welfare

Animal welfare is deeply important to us, especially as our innovation relies on insights gained from pre-clinical research involving animals.

For pre-clinical research activities (i.e. involving animal studies), we collaborate with research partners who share our commitment to the highest ethical standards. We expect all partners and their internal animal review boards to strictly adhere to the 3R principles. A key example of this commitment is our partnership with EPFL, our main preclinical research partner, which upholds and advances the 3R principles in its research (details [here](#)).

<sup>1</sup>Based on data from Lausanne, Switzerland site



# Sustainable Supply Chain

As our devices are primarily manufactured by suppliers, much of our social and environmental impact occurs in our supply chain. Setting clear standards for suppliers and collaborating with them on continuous improvement will be key to reducing risks to our business and the people in our value chain, especially in relation to conflict minerals.

## Policies & Measures

We have updated our supplier relationship management process to include environmental, social and governance considerations during supplier selection, evaluation, approval and monitoring. Our goal is to prioritize suppliers that meet all our requirements on quality, price and sustainability.

We assess new suppliers on sustainability using a detailed pre-qualification questionnaire which includes executing a Conflict Minerals Declaration of Compliance for relevant suppliers. Though we source very small amounts and our influence is limited, it is important to us to ensure responsible sourcing practices and uphold a supply chain free from human rights abuses.

In 2024, we introduced a comprehensive **Global Third-Party Code of Conduct**, applicable to suppliers and contractors, to establish standards and responsibilities in areas that include legal compliance, ethical business practices, human rights and labor practices, environmental responsibility, and reporting. We also certified our procurement team CIPS ethics compliant in 2024 to ensure they are equipped with the knowledge and training to make responsible decisions in supply chain management.

## Performance

In 2024, we updated the supplier selection, relationship management and monitoring procedures mentioned above and included in our pre-qualification questionnaire a Conflict Minerals Declaration of Compliance for companies where this is relevant.

100%

of new suppliers have answered sustainability questions in our pre-qualification questionnaire since it was introduced in October 2023.



# Governance

Strong governance underpins everything we do. Our priorities are anti-bribery and anti-corruption, responsible marketing and relationships, and information security.

## Anti-Bribery & Anti-Corruption

Acting with openness and integrity and to high ethical standards is essential for earning stakeholder trust and protecting our business from regulatory and reputational risk.

### Policies & Measures

ONWARD's **Code of Conduct** sets out our expectations for anyone acting on behalf of our company in areas such as anti-bribery and corruption, anti-money laundering, government relations and political affairs, international business practices, and whistleblowing. It prohibits employees from participating in any form of illegal bribery or money laundering, or from offering or accepting valuable gifts from anyone outside the company.

### Performance

There were no incidents of bribery or corruption confirmed or suspected within the company in 2024. In early 2024, we performed an initial corruption risk assessment of our countries of operation (the Netherlands, Switzerland and the US) against the Transparency International Corruption Perceptions Index and determined that none presents a high risk.



Incidents of bribery or corruption confirmed or suspected within the company

## Responsible Marketing & Relationships

Ethical and transparent relationships with payors, healthcare providers and patient organizations build trust and foster innovation, improving our ability to innovate and make a greater difference for people with spinal cord injuries.

### Policies & Measures

We are dedicated to complying with all applicable laws governing our interactions with payors and healthcare providers in all countries where we operate, and to building long-standing relationships with high-profile patient organizations. Our marketing and sales efforts currently focus on clinicians providing care to people with SCI in rehabilitation centers. These include rehabilitation physicians as well as physical and occupational therapists who provide post-injury rehabilitation and ongoing support to those who are chronically injured.

Our Marketing Code of Conduct for Interactions with Healthcare Professionals guides relevant employees on appropriate and compliant engagement with healthcare professionals during consulting relationships, sales and promotional activities such as external conference attendance, and training on ONWARD technologies. Our relevant employees are also trained in compliance and were made aware of the different resources and escalation processes available to ensure they follow guidelines. We compensate healthcare professionals and opinion leaders providing consultancy to ONWARD at fair market value and in strict compliance with the applicable regulations and standards.

### Performance

In 2024, we introduced templates for consultancy agreements with healthcare professionals to ensure they are compliant with our Marketing Code of Conduct, introduced in 2023.



## Governance



Monetary losses as a result of legal proceedings associated with false marketing claims

## Privacy & Information Security

Our devices and clinical studies capture personal data, including health and medical information, and we have a responsibility to keep this information safe. The collection and processing of medical information is based on the individual's informed written consent. We aim to seek and obtain consent, the 'gold standard' of data privacy, even when not strictly required by law. When we collect health data, it is with the sole purpose of continually improving the efficiency and safety of our therapies. ONWARD is committed to ensuring that cybersecurity and confidentiality are built into our products and processes.

### Policies & Measures

We are subject to various regional, national, and state laws that protect the confidentiality and security of patient health information, including patient medical records and other forms of personal information. We are committed to applying the two most rigorous privacy regulations to our global operations, namely the United States' Health Insurance Portability and Accountability Act (HIPAA) and the European Union's General Data Protection Regulation ((EU) 2016/679; GDPR). This legislation includes the data subject's right to access or amend certain records containing protected health information or to request that their use or disclosure be restricted or even deleted entirely ( the 'right to be forgotten').

Our Global Data Privacy Policy, introduced in 2023, is designed to comply with the European General Data Protection Regulation, one of the world's most demanding and protective data privacy law frameworks. It also complies with all other applicable laws where we operate, and commits us to protecting all data collected in the course of our business, including from clinical study participants and their caregivers; patients; healthcare professionals and researchers; users of our products and services, including website users; contractors, vendors and business partners; representatives of the scientific community; employees and job applicants. Our **2024 Annual Report** provides more details on privacy and data governance. Our cybersecurity

procedure describes our measures for ensuring our devices and their components remain secure throughout the product lifecycle.

To safeguard our business systems and information, our IT security awareness program equips our employees with best practices to create a culture of security as the best defense against threats. An expert third-party provides us with 24/7 security monitoring and incident response capabilities.

### Performance

We have an external Data Protection Officer strengthening our data governance. In addition, we have established a Data Privacy Committee and a Global Data Protection Policy complemented through a series of implementing procedures, mechanisms and employee training to ensure compliance with GDPR and HIPAA, as applicable.

We have also strengthened the compliance of our products with cybersecurity and data protection requirements under European GDPR and US HIPAA. We have established traceability in accordance with relevant standards and built evidence that our products are compliant with the regulations. We continue improving our processes for compliance with GDPR and HIPAA requirements, creating a robust data privacy platform which supports the commercial launch of ARC<sup>EX</sup> in the US in late 2024. We are strengthening our data management and processes, we regularly train our staff on security and privacy issues and employ best practices for the administration of our systems and infrastructure.



Confirmed data privacy breaches during the year



Confirmed information security breaches during the year

