



ONWARD[®] MEDICAL

Sustainability
Summary
2025

ONWARD
Medical N.V.

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About this Summary

Welcome to ONWARD Medical's 2025 sustainability summary, published 31 March 2026, which describes our sustainability priorities, approach, and performance for the year ended 31 December 2025. This summary covers our full business, including ~140 employees spread across our headquarters in Eindhoven, the Netherlands; our science and engineering center in Lausanne, Switzerland; and our field sales, field service and clinical organization in the US.



A Message from our CEO

Dear Stakeholders,

ONWARD Medical prioritizes sustainable business practices as we advance our mission to develop breakthrough therapies to restore movement, function, and independence for people with spinal cord injuries (SCI) and other movement disabilities.

We are committed to introducing a new era for people living with SCI, who have long awaited viable solutions designed to meet their needs. By leveraging our expertise and partnering with other leading SCI organizations worldwide, we are driving innovation, raising awareness, and ultimately, offering hope for progress.

As a commercial organization, it is our responsibility to integrate sustainable practices into the design, development, manufacture, and sale of our devices and therapies. With the launch of ARC^{EX}, the first and only US FDA-cleared technology indicated to improve hand strength and sensation after SCI, we built and deployed a highly qualified field sales and service organization of physical and occupational therapists capable of making our therapies accessible to more people. We further demonstrated our commitment by providing state-of-the-art training and education for rehabilitation clinics and caregivers.

While continuing to pioneer new treatments for SCI, we ensure they meet the highest standards of quality and safety. This is mirrored in several key milestones we reached in 2025. We received a US FDA Investigational Device Exemption (IDE) for the ARC^{IM} System, enabling the launch of our Empower BP global pivotal study. This study evaluates the safety and effectiveness of ARC^{IM} in managing blood pressure instability – a debilitating symptom for people after SCI. We were awarded CE Mark certification for the ARC^{EX} System under the European Union Medical Device Regulation (MDR), enabling commercialization in the

European Union and certain other countries. ARC^{EX} also received UL Mark certification, a globally recognized symbol of product safety and quality.

Our focus on sustainability includes environmental stewardship. We are embedding sustainability into our operations, from renewable energy use to responsible supply chain management. Furthermore, our dedication to creating value for both people and the planet helps us attract outstanding talent who share our devotion to improving lives while protecting natural resources for future generations.

We have ambitious goals for 2026 and aim to continue improving our sustainability performance and practices in daily operations.

Stay updated on our progress by visiting our website at www.onwd.com, or by following ONWARD Medical on social media.

Warm regards,



Dave Marver
Chief Executive Officer

Our Impact

ONWARD Medical is the leading neurotechnology company pioneering therapies to restore movement, function, and independence in people with 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 affects 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 help restore movement and function after SCI. The stimulation can be delivered by an external platform, called ARC^{EX}; an implantable platform, called ARC^{IM}; or through our ARC^{BCI} platform which pairs our implantable system with an implanted brain-computer interface (BCI). ARC^{BCI} has the potential to restore thought-driven movement via our wireless ONWARD DigitalBridge™.

In December 2024, we received our first FDA authorization for our external device, ARC^{EX}. In 2025 we focused on successfully introducing ARC^{EX} to the US and, post our CE-Mark approval in September 2025, to European markets. Our other key priority for 2025 was initiating our pivotal trial for our implantable platform, ARC^{IM}. In August 2025, we received IDE approval and started rolling out the study. Beyond driving commercial success of ARC^{EX} and rolling out

this pivotal trial, our organization also continued to advance our pipeline including additional indications for ARC^{EX} and ARC^{IM} and our brain-computer-interface platform, ARC^{BCI}.

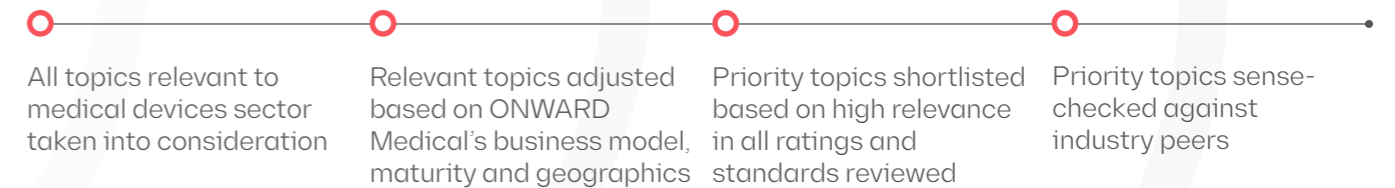
Please read our **2025 Annual Report** for more details on our technology, clinical evidence, business model, corporate strategy and societal impact. This sustainability summary focuses on our efforts to integrate strong social, environmental and governance practices throughout our company.





Our Sustainability Priorities

Our sustainability priorities are determined by building on sustainability assessments from external agencies and the Sustainability Accounting Standards Board Medical Equipment and Supplies Standard. All inputs are 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 determined our shortlist of priorities based on those given the highest importance in the aforementioned inputs. In 2025, we reexamined this shortlist, keeping in mind our responsibilities as a newly commercial company. Overall, our priorities remained largely unchanged. With commercialization underway, we have increased our focus on the areas that present greater risk to ONWARD as we scale. These priorities include a greater focus on product and customer safety, responsible marketing, and maintaining high quality standards.



Our Sustainability Priorities

	Social	Environmental	Supply Chain	Governance
Our Principles	Innovating for the underserved Attracting & retaining top talent	Maintaining high ethical standards		Partnering with patient groups
Our Priorities	<ul style="list-style-type: none"> Access & affordability Product & customer safety Career management Fair opportunity 	<ul style="list-style-type: none"> Environmental management GHG emission reductions Product design & lifecycle 	<ul style="list-style-type: none"> Supplier risk management Critical materials 	<ul style="list-style-type: none"> Anti-bribery & corruption Responsible marketing Privacy & security

Our support for the Sustainable Development Goals



This sustainability summary covers all our priority topics.

In the future, we intend to continue to refine our priorities as our organization changes. 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 collaborative. ONWARD's key stakeholders include:

- People living with SCI and their caregivers
- Patient advocacy groups
- Regulators in the US 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



2025 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
- 12** average hours of mandatory training per employee
- 81%** participation rate in annual employee engagement survey
- 23** nationalities represented in our workforce

Women at ONWARD Medical represent:

- **44%** of our workforce
- **37%** of supervisors and managers¹
- **30%** of the Leadership Team²
- **33%** of Board members

0 lost-time work-related injuries

Environmental

- 100%** of purchased electricity³ from renewable sources
- 0** environmental non-compliances

Supply Chain

100% of new suppliers answer sustainability questions in our pre-qualification questionnaire⁴

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

¹Defined as employees with one or more direct reports

²Defined as full-time roles within the Company's Leadership Team

³Figures reflect only company-purchased electricity from our Lausanne site; other locations use landlord-managed electricity included in rent which is not under our control and therefore not reported here

⁴Since its introduction in October 2023





Our Social Impact

We innovate to empower people with spinal cord injury (SCI) 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 effective care, regardless of their location or individual circumstances. Our mission is to make our innovative therapies widely available to those in need by aligning product development, clinical evidence generation, and market access planning.

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 clinical and real-world evidence, and intend to offer assistance with prior authorization and case-by-case approvals designed to facilitate early access to ARC Therapy.

Geographically, we aim to achieve the greatest access to our therapies, starting with markets that have the rehabilitation and/or reimbursement infrastructure to support the 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^{EX} System is currently cleared for clinic and home use in the US, EU, and select other countries including the UK and Switzerland. Our close collaboration with rehabilitation

professionals ensures seamless integration of ARC^{EX} Therapy into clinical workflows. Offering the therapy for home use increases access to the treatment for people who live in remote areas or cannot regularly visit a rehabilitation clinic. We are pursuing reimbursement and coverage pathways to support patient access to this home-based therapy. We also intend to pursue partnerships and access programs that can help reduce barriers to treatment. For more information about ONWARD's market access strategy, please refer to our **2025 Annual Report**.

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. We are committed to maintaining full compliance with applicable requirements across all markets in which we operate.

ONWARD is committed to product safety for our commercial customers, as well as rigorous clinical trial design and execution, for which ONWARD partners with regulatory authorities globally to meet all applicable requirements. For more information about ONWARD's clinical and regulatory team and requirements, please refer to the operational review in our **2025 Annual Report**.



Our Social Impact

Policies & Measures

Our global quality system complies with applicable regulations and standards related to the medical devices industry in Europe and the 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 and EU MDR certified.

Performance

Our ISO 13485-certified quality management system passed its most recent independent audit in September 2025. In 2025, we also achieved CE Mark approval for our ARCEX System, marking a major milestone in bringing our therapy to people with SCI across the EU and we received UL Mark certification, a globally recognized symbol of product safety and quality.



Devices were recalled during the year

Fulfilling careers

We operate at the forefront of our industry, seeking not only the brightest minds but also those who bring creativity and unique 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 a fair 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.

As ONWARD continues to grow, our culture evolves alongside it. In 2025, we introduced the ONWARD Commitments, a set of principles designed to keep our values aligned with our vision. These commitments promote:

- serving with purpose
- acting with integrity
- leading with courage
- growing through collaboration

We redesigned our annual people cycle to integrate our ONWARD Commitments directly into performance expectations. The Performance Cycle is outlined in detailed guidelines that define the process from collecting peer feedback to conducting development and objective-setting conversations. Our managers calibrate their team's performance to ensure a fair and consistent approach. 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.

In 2025, we introduced a Leadership Training program for our middle management team to further strengthen our leadership capabilities. 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 our employees worldwide. We also introduced "Share & Learn" sessions to promote broader knowledge exchange across functions and teams.

Employee well-being remains fundamental to our culture. Throughout 2025, we organized a range of initiatives promoting employee well-being and supporting a healthy work-life balance including a well-being month, step challenge, appreciation week, as well as many social gatherings and team bonding activities. Our Lausanne site has a dedicated space for



Our Social Impact

relaxation and mindfulness called the “Zen Zone”. We also continue to offer flexible hybrid working arrangements where possible, enabling employees to better balance their personal and professional commitments.

Finally, we gather regular feedback from our employees. Each year, we conduct an annual engagement check-in with all employees at the beginning of the year and an annual engagement survey in the second half of the year, through which we deduct areas for improvement as an organization. The results are analyzed in detail, and actionable recommendations are developed.

Performance

In 2025, our annual engagement survey had an 81% participation rate. The results showed that workplace culture, collaboration, and manager support remain our key strengths.

12.4

Average hours of mandatory training per employee

81%

Participation rate in our annual employee engagement survey

Fair Opportunity

Unique backgrounds bring different perspectives, which help foster innovation and generate better business outcomes. Providing fair opportunities 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. In our **Fair Opportunity Policy** we promote fairness across the full employment lifecycle, including recruitment, compensation, career progression, leadership representation, working conditions, retention and access to development opportunities. To bring this to life, we periodically collect and review workforce-related disaggregated data, including conducting an annual pay gap assessment. The insights derived from this data inform appropriate actions and initiatives.

Performance

Our company is geographically and culturally varied, bringing together a wide range of perspectives.

23

nationalities represented in our workforce

Women at ONWARD represent:

- 44% of our workforce
- 37% of supervisors and managers⁵
- 30% of the Leadership Team⁶
- 33% of Board members

⁵Defined as employees with one or more direct reports

⁶Defined as full-time roles within the Company's Leadership Team



Our Social Impact

Health, Safety & Working Conditions

Creating a safe, healthy, and fair 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 non-harassment, 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.

For our science and engineering center in Lausanne, the site with the largest in-person workforce, our emergency response training includes an annual evacuation exercise and trainings for a team of first aiders. We currently have a team of 12 individuals in this role, who completed a refresher course in December 2025. Additional trainings are organised as needed. A special session on the management of risk related to lithium-based batteries took place in February 2025.

Performance

In 2025, our health, safety, and working-conditions policies proved effective, with zero work-related injuries reported.



Lost-time work-related injuries



Child & Forced Labor

Our workforce is composed of highly skilled people with advanced degrees or training, many with graduate or post-graduate educations, and we operate in geographies at low risk of child and forced labor (the Netherlands, Switzerland and the US). In accordance with our **Global Third-Party Code of Conduct** we are committed to preventing child and forced labor and expect all third parties to adhere to relevant conventions and legal requirements.



Environmental Management

ONWARD continues to have a limited environmental footprint. We actively monitor our environmental impact, and our aim is to build a resource efficient business that maintains minimal environmental impact as it grows.

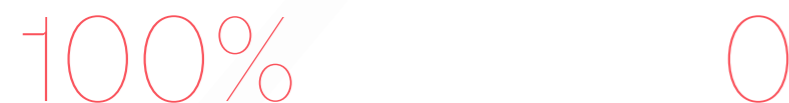
Policies and measures

We maintain a **Global Environmental Policy** as our business evolves. 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 Waste Management Work Instruction sets out responsibilities for managing different waste streams in our science and engineering center in Lausanne.

Performance

In 2025, we consumed 64.2 MWh of purchased electricity of which 100% was from renewable sources.

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



Purchased electricity⁷ from renewable sources Environmental non-compliances

⁷Figures reflect only company-purchased electricity from our Lausanne site; other locations use landlord-managed electricity included in rent which is not under our control and therefore not reported here

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, Authorization 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 and bind through legal contractual provisions all partners and their internal animal review boards to strictly adhere to the principles of the 3Rs (Replace, Reduce, Refine). 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](#)).



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 our environmental footprint, as well as risks to our business and the people in our value chain.

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. Alongside quality compliance, delivery performance, and other relevant factors, ESG criteria are an important contributor to our supplier selection decisions. Though the volumes we source are small 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.

We are committed to our comprehensive **Global Third-Party Code of Conduct**, applicable to suppliers and contractors. It establishes 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 as CIPS ethics compliant to ensure they are equipped with the knowledge and training to make responsible decisions in supply chain management.

Performance

100%

of new suppliers answer our sustainability questions in our pre-qualification questionnaire⁸.

⁸Since its introduction in October 2023





Governance

Strong governance underpins everything we do. As we expand our commercial presence, our priorities and responsibilities evolve accordingly. We are committed to fostering a strong ethical culture by adhering to strict anti-bribery and anti-corruption standards, responsible marketing and business relationships, and information security principles.

Anti-Bribery & 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 bribery or money laundering, or from offering or accepting valuable gifts from anyone outside the company. We have a Chief Compliance Officer appointed by the Board, and compliance is treated as a shared responsibility across the organization rather than owned by a single function.

Performance

There were no incidents of bribery or corruption confirmed or suspected within the company in 2025.



Incidents of bribery or corruption confirmed or suspected within the company



Governance

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 who provide 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. We abide by the **AdvaMed Code of Ethics** and engage with AdvaMed as needed.

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 are 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



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

Privacy & Information Security

Our company collects and processes personal information including health, medical, and other identifying data, and we take our responsibility to protect this information seriously. While there are lawful bases for processing personal information, we aim to obtain informed consent whenever possible, recognizing it as the ‘gold standard’ of data privacy. Personal information is collected and processed solely to provide, improve, and ensure the safety and effectiveness of our products and services. We are committed to embedding robust cybersecurity, confidentiality, and privacy protections into all our operations, products, and processes, across clinical studies, commercial activities, and broader interactions with individuals.

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 complying with the United States’ Health Insurance Portability and Accountability Act (HIPAA) and the European Union’s General Data Protection Regulation ((EU) 2016/679; GDPR) where and to the extent applicable to our global operations. 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’).

In 2025, we also initiated the development of a comprehensive Integrated IT General Controls (ITGC) framework, laying the foundation for compliance with ISO 27001 and SOC 2, in addition to HIPAA. This framework ensures that our people, equipment, and data including patient and customer information, are protected, secured, and continuously monitored as we scale commercially.

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. Our VP Legal also serves on the Leadership Team, providing strong organizational leadership and an independent voice on data privacy matters across the company.



Governance

Our Global Data Privacy Policy is designed to comply with the European GDPR, 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.

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

Our **2025 Annual Report** provides more details on privacy and data governance.

Performance

We have achieved full compliance with applicable cybersecurity and data protection requirements including 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 implemented a robust data privacy platform which is key as we scale ARC^{EX} commercially. We also continue to strengthen our data management processes, regularly training our staff on security and privacy issues and employing best practices for the administration of our systems and infrastructure.



Confirmed data privacy breaches during the year



Confirmed information security breaches during the year



SASB Table

Topic	Metric	Code	Metric
Affordability & Pricing	Description of how price information for each product is disclosed to customers or to their agents	HC-MS-240a.2	Our pricing takes into account the economic value that our products deliver to patients, providers, and the broader healthcare system. We provide customers or their authorized agents with formal quotes that specify the applicable price. Pricing may vary by geography, purchase volume, contractual terms, and other relevant factors.
	Percentage change in: (1) weighted average list price and (2) weighted average net price across product portfolio compared to previous reporting period	HC-MS-240a.3	N/A – as our first commercial products were launched in December 2024, we do not yet have a prior reporting period with established list or net prices
Product Safety	(1) Number of recalls issued, (2) total units recalled	HC-MS-250a.1	(1) 0 (2) 0
	Products listed in any public medical product safety or adverse event alert database	HC-MS-250a.2	None
	Number of fatalities associated with products	HC-MS-250a.3	0
	Number of enforcement actions taken in response to violations of good manufacturing practices (GMP) or equivalent standards, by type	HC-MS-250a.4	0
Ethical Marketing	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	HC-MS-270a.1	0
	Description of code of ethics governing promotion of off-label use of products	HC-MS-270a.2	Our Code of Conduct prohibits any promotion of off-label use by requiring that all interactions with healthcare professionals remain ethical, evidence-based, and free from any influence that could compromise independent clinical judgment.



SASB Table

Product Design & Lifecycle Management

Discussion of process to assess and manage environmental and human health considerations associated with chemicals in products, and meet demand for sustainable products	HC-MS-410a.1	Device safety and human health considerations are central to our design and development process. We also integrate sustainability into our product design. Please see the section “Product design and lifecycle management” on p. 25 for details.
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Total amount of products accepted for take-back and reused, recycled or donated, broken down by: (1) devices and equipment and (2) supplies	HC-MS-410a.2	Not disclosed
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Supply Chain Management

Percentage of (1) entity’s facilities and (2) Tier 1 suppliers’ facilities participating in third-party audit programmes for manufacturing and product quality	HC-MS-430a.1	(1) 100% (2) we are auditing 100% of our critical suppliers for manufacturing and product quality
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Description of efforts to maintain traceability within the distribution chain	HC-MS-430a.2	Our components and products use serial numbers, lot numbers and UDIs as key tools to maintain traceability from incoming shipments from our suppliers to the devices delivered to our customers.
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Description of the management of risks associated with the use of critical materials	HC-MS-430a.3	We manage risks associated with critical materials by requiring relevant suppliers to complete a Conflict Minerals Declaration of Compliance as part of our pre-qualification process. Additionally, our device components are selected in accordance with key certificates like REACH and ROHS.
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Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	HC-MS-510a.1	0
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Description of code of ethics governing interactions with health care professionals	HC-MS-510a.2	We govern interactions with healthcare professionals through a strict Code of Conduct that prohibits improper influence, ensures ethical, compliant engagement, and upholds the highest standards of integrity in all professional relationships.
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The background of the image consists of a repeating pattern of wavy, vertical lines in various shades of red, creating a textured, organic appearance.

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