

Modern Slavery Statement 2018

This modern slavery statement is made by Cochlear Europe Ltd (CEL), a UK subsidiary of Cochlear Limited (Cochlear). CEL distributes Cochlear products to Europe, Middle East and Africa (EMEA) regions.

Cochlear is a global leader in implantable hearing solutions, with our products sold in over 100 countries, either through direct operations or distributors. We utilise a global supply chain to source components for our manufacturing operations, which are located in Australia, Belgium, Sweden and the U.S.

Our commitment

Cochlear is committed to working with its supply chain partners to ensure we meet our ethical, social, labour and environmental standards.

Policies and procedures

There are a number of policies and procedures designed to mitigate modern slavery risks in Cochlear's supply chain.

- Cochlear's Global Procurement Policy requires employees to consider economic, social and environmental impact when acquiring goods or services from suppliers and to conduct appropriate due diligence and implement mitigations measures if required.
- The Supplier on-boarding process screens new critical direct suppliers to our Australian and European manufacturing sites for major governance, human rights and environmental issues.
- Cochlear's standard legal agreements oblige Cochlear's suppliers not to engage in and take steps to prevent human rights abuses, exposure to forced or compulsory labour, use of child labour, sexual abuse, human trafficking or harassment in its supply chain.

Due diligence

Cochlear has carried out an environmental, social and governance risk assessment of its key direct suppliers' based on the location of the suppliers' manufacturing sites in 2018. It has utilised resources from independent organisations such as the Global Slavery Index 2018 to identify critical direct suppliers in higher risk countries and industries.

All critical direct suppliers which are deemed as high risk will be expected to complete a questionnaire which covers their governance, policies, training and supply chain management processes.

If Cochlear identifies any practices of concern, the supplier may be subject to an on-site audit of their facilities and working conditions to assess whether the supplier meets Cochlear's expectations.

Where deemed necessary, the effectiveness of corrective actions to be implemented by the supplier will be continually monitored.

Whistleblowing

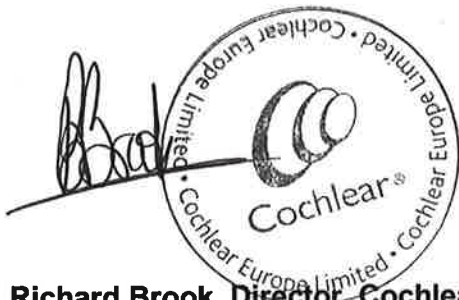
Cochlear has a Whistleblower Protection Policy and has appointed an independent third party which Cochlear staff and representatives can contact to report any potential breaches of Cochlear's policies and procedures.

Training

Regular compliance training is provided to personnel who have responsibility for procurement and supply chain management.

Governance

This statement has been approved by the Board of Cochlear Europe Limited.



The image shows a handwritten signature in black ink over a circular stamp. The stamp contains the Cochlear logo (three orange ovals) and the text 'Cochlear®' in the center. The outer ring of the stamp contains the text 'Cochlear Europe Limited' repeated three times, separated by dots.

Richard Brook, Director, Cochlear Europe Limited