

# 2022 GLOBAL MODERN SLAVERY STATEMENT

## OUR BUSINESS AND SUPPLY CHAINS

Owens & Minor, Inc. is a *Fortune 500* global healthcare solutions company integrating product manufacturing and delivery, home health supply, and perioperative services to support care through the hospital and into the home. Owens & Minor drives visibility, control and efficiency for patients, providers, and healthcare professionals across the supply chain with proprietary technology and solutions, an extensive product portfolio, an Americas-based manufacturing footprint for personal protective equipment (PPE) and surgical products, as well as a robust portfolio of products and services for patients managing chronic and acute conditions in the home setting.

Owens & Minor's supply chains are quite complex and have significant scale with third parties around the world. There are a number of laws and regulations in countries where we do business including, but not limited to, the California Transparency in Supply Chains Act (SB 657), the U.K. Modern Slavery Act, and the Australian Commonwealth Modern Slavery Act, amongst others which are designed to provide consumers with information regarding manufacturers and retailers' efforts to address the issue of modern slavery and human trafficking.

This statement explains our position on and actions relating to modern slavery.

For clarity, Owens & Minor provides the definitions of the following terms that we use throughout this statement:

- Modern slavery –All forms of involuntary labor, including trafficked labor
- Supplier – Site that manufactures our products, raw materials, or components.
- Teammate(s) - Includes all officers, managers, and employees of the Company, as well as contracted/temporary employees and third-party entities who may represent the Company.
- Vendors - Refers to any distributors, agents, suppliers, representatives, and other business partners and their employees, directors, officers, agents, representatives, and subcontractors.

## INTRODUCTION

This statement has been published in accordance with the the California Transparency in Supply Chains Act (SB 657), the U.K. Modern Slavery Act, and the Australian Commonwealth Modern Slavery Act 2018. This statement explains the steps that Owens & Minor, Inc. and its subsidiaries have taken to prevent modern slavery and human trafficking in our business and supply chain.

Owens & Minor, Inc. publishes this statement on behalf of the Owens & Minor group, which includes O&M Halyard UK Limited, our entity that is covered by the UK Act, and O&M Halyard Australia Pty Ltd, our Australian subsidiary that is covered by the Australian Act.

## MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

We recognize the inherent risks in medical device manufacturing. Our Code of Honor applies to all our Teammates, including those at manufacturing facilities.

When Owens & Minor does not directly manufacture its own products, we contract with third party suppliers to manufacture our branded products. Our comprehensive quality and compliance program is developed in recognition of the risks that exist in having a geographically disbursed supply chain in the medical device and PPE industry. We continuously monitor these suppliers for compliance with our policies and framework that are set out below.

Recently, Owens & Minor has taken the following steps to enhance our Environmental, Social Compliance, and Governance (ESG) efforts, which includes addressing modern slavery in our supply chain:

- Deployed a Social Compliance Questionnaire to all Tier 1 Suppliers (primary suppliers)
- Taking a risk-based approach, conducted on-site Vendor audits
- Deployed a Supplier Questionnaire to all Suppliers in China requesting confirmation that no forced labor, including forcibly displaced minorities, are involved in the manufacturing of our products or the provision of our services.
- Established an Owens & Minor Environmental, Social and Governance (ESG) program with oversight from the Board of Directors and the Executive Leadership Team. For more information visit: <https://investors.owens-minor.com/esg>
- Converted our Labour Standards Assurance System (LSAS) Committee to a broader Social Compliance Committee focused on addressing all social compliance issues in our supply chain globally.
- Our glove manufacturing facility in Thailand, *Safeskin Medical and Scientific Thailand*, has been awarded the Thailand Labour Management Excellence award, for the last three years. This award recognizes our commitment to labour relations and welfare, our OHS (Occupation Health and Safety) practices, and adherence to Thai labour standards.

## ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

Owens & Minor's social compliance program strives to uphold human rights in all our business activities. Owens & Minor supports this program with the following elements:

- Oversight of the Program
  - The O&M Board of Directors, the Executive Leadership team, and the Company's Human Resources, Legal, Ethics, Compliance, & Privacy, and Supply Chain leaders have responsibility to ensure adherence to social compliance laws that apply in countries of operations, including regulations on modern slavery.
- Risk Analysis
  - Taking a risk-based approach, Owens & Minor periodically assesses our operations to identify areas of highest risk. This includes but is not limited to financial, reputational, operational, legal, and social compliance risk. Once identified, risks are prioritized using key performance indicators and are then systematically addressed.
- Policies and Procedures
  - Owens & Minor develops, maintains, and deploys policies and procedures that define our responsibilities and obligations regarding social compliance.
- Training and Communication
  - All Teammates receive Code of Honor training annually, and Owens & Minor provides more specific training related to social compliance to those Teammates involved with procurement and our supply chain.
- Auditing and Monitoring
  - Owens & Minor conducts periodic audits on our own manufacturing locations as well as audits of Suppliers and Vendors.
- Whistleblower Hotline
  - Owens & Minor maintains and supports a whistleblower hotline with instructions for all Teammates, Vendors, and any other stakeholders, to report potential violations of this policy, social compliance issues, or other relevant concerns, to Ethics, Compliance, and Privacy (email: [gm-codeofhonor@owens-minor.com](mailto:gm-codeofhonor@owens-minor.com)), via the Ethics Hotline at [www.omicodeofhonor.com](http://www.omicodeofhonor.com), or +1-866-293-2599. Our hotline also supports anonymous

- reporting and is aligned with various Whistleblower guidelines, including the Australian Whistleblower Protection laws.
- In addition, Owens & Minor has a “non-retaliation policy” that protects Teammates and other individuals from retaliation for reporting potential concerns in good faith or cooperating in an investigation. Violation of any Owens & Minor policy, including this policy, may subject the involved Teammate(s) to disciplinary action, up to and including termination. Owens & Minor reserves the right to determine, at its own discretion and based on the information available to it, whether any policy has been violated. Likewise, Owens & Minor reserves the right to terminate collaboration with any Supplier that, upon investigation, was found to be in violation of any Owens & Minor policy, including this policy.
  - Fair Treatment
    - Owens & Minor does not tolerate any form of harassment or discrimination from Teammates or other business stakeholders. Further information regarding Owens & Minor’s commitment to fair treatment can be found in the *Corporate Responsibility Statement*, *Code of Honor*, and the *Teammate Handbook*.
  - Freedom from Forced Labor
    - Owens & Minor prohibits the physical or mental abuse of Teammates and individuals working in our supply chain and prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, trafficked, or slave labor. Owens & Minor is committed to doing its part to end and prevent these abuses throughout our supply chain. In addition, our policies, risk assessment process, and Supplier audits consider the eleven (11) Indicators of Forced Labor as defined by the International Labor Organization (ILO):
      - Abuse of vulnerability
      - Deception
      - Restriction of movement
      - Isolation
      - Physical and sexual violence
      - Intimidation and threats
      - Retention of identity documents
      - Withholding of wages
      - Debt bondage
      - Abusive working and living conditions
      - Excessive overtime
    - For more information see:  
[https://www.ilo.org/global/topics/forced-labour/publications/WCMS\\_203832/lang--en/index.htm](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm)
  - Freedom from Child Labor
    - Owens & Minor and our Vendors shall not employ any person under the age of 15. If local law sets a minimum working age lower than 15, but this is in accordance with developing country exceptions under International Labor Organization Convention (ILO) Convention 138, the lower age will apply. Owens & Minor will not recruit child labor nor exploit children in any way, and the recruitment and/or exploitation of children is also strictly prohibited for all Suppliers and other supply chain partners.

## POLICIES AND OTHER STANDARDS

Owens & Minor is committed to conducting its business in a socially conscious, environmentally friendly, and sustainable manner. Owens & Minor combines social compliance and environmental sustainability into one overarching standard that demonstrates our commitment in this regard to our Teammates, Vendors, shareholders, and customers. The following O&M policies contribute to our overall Social Compliance Program:

- Code of Honor
- Vendor Code of Conduct
- Supplier Social Compliance Standards and Audit Guide
- Corporate Responsibility Policy Statement
- Conflict Minerals Policy Statement
- Supplier Diversity Policy

This document is available externally on our corporate website.

Owens & Minor expects our Vendors to comply with the standards set forth in this document

If you have any questions or you would like to discuss our Global Modern Slavery Statement in more detail, please email [GM-codeofhonor@owens-minor.com](mailto:GM-codeofhonor@owens-minor.com). If you need to report an issue anonymously, you can report online or through our Ethics Hotline phone number. Instructions are available at [www.OMICodeofhonor.com](http://www.OMICodeofhonor.com). Our Code of Honor, which is our guideline for ethical behavior, is also available via that site.

Approved by the Owens & Minor, Inc. Board of Directors

August 5, 2022