

Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report (2024)

Opening Statement

This report is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) (the "Act") and on behalf of Intuitive Surgical Canada, Inc. ("Intuitive Canada"), a reporting entity headquartered in Halifax, Nova Scotia and incorporated under the laws of Nova Scotia having Business Number 772393534RM0001. This report covers our activities and actions taken for our financial year 2024 ("2024").

Structure, Activities and Supply Chains

Intuitive Canada is a subsidiary of and part of a consolidated group (collectively, "Intuitive"), parented by Intuitive Surgical, Inc., a U.S. corporation having approximately 16,000 employees worldwide (27 being at Intuitive Canada in 2024). As such a member, Intuitive Canada participates in Intuitive's collective programs and policies related to human rights and supply chain compliance. This is a single report covering Intuitive Canada. This report sets out the steps that Intuitive has taken and is continuing to take to ensure that forced labour and child labour are not taking place within our business or supply chains.

Our Board of Directors, through its Governance and Nominating Committee and Audit Committee, oversees environmental, social, and governance (ESG) matters at Intuitive, including human rights-related compliance and preventing forced labour.

Our cross-functional Compliance Committee oversees Intuitive's compliance with applicable laws, including those related to human rights and forced labour. It is led by our Chief Legal and Compliance Officer and features senior executive leaders representing key functions across our business, including Legal, Finance, Human Resources, and Regulatory Affairs and Quality Assurance. The Compliance Committee is responsible for the development, implementation, maintenance, and administration of our compliance programs, including our human rights program.

Intuitive ensures the secure distribution of robotic surgical systems and accessories, such as the da Vinci Surgical System, to Canadian hospitals by maintaining a robust and reliable supply chain. The company leverages logistics and supply chain management strategies to ensure that all equipment and components are delivered safely and efficiently across the country. By collaborating with trusted logistics partners and implementing rigorous quality control measures, Intuitive guarantees that their products meet the highest standards of safety and performance. This secure supply chain not only supports the distribution of cutting-edge robotic technology but also ensures that Canadian hospitals can consistently offer minimally invasive surgical options to their patients. Furthermore, Intuitive provides extensive training and support to healthcare professionals, reinforcing the safe and effective use of their systems in clinical settings.

Intuitive is committed to advancing minimally invasive care through a comprehensive ecosystem of products and services. This connected ecosystem includes systems, instruments and accessories, learning, and services connected by a digital portfolio that enables actionable digital insights across the care continuum and provides enhanced capabilities, intraoperative

guidance, decision support, and a personalized learning journey, all with the goal to help improve outcomes and efficiency.

Policies and Due Diligence Processes

Intuitive is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

In relation to forced labour and child labour, Intuitive has implemented the following policies and due diligence processes to address this commitment:

- **Supplier Code of Conduct** - Intuitive's key expectations for our supply chain including compliance with global modern slavery and human rights legislation.
- **Supplier Agreements** - Require supplier compliance with laws including child labor laws, and laws against slavery and/or human trafficking.
- **Global Supplier Manual** - Intuitive is committed to the highest standards of business conduct. This commitment requires that Intuitive not only conducts business in accordance with all applicable laws and regulations but that suppliers also operate using the highest standards of social responsibility.
- **The California Transparency in Supply Chains Act of 2010** - This Act requires certain companies to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale.
- **UK Modern Slavery Act of 2015** - This act requires certain companies to produce an annual statement setting out the steps they have taken to prevent modern slavery in their business and supply chains.
- **Conflict Minerals Policy Statement** - Intuitive is committed in its efforts to comply with the Conflict Minerals Rule requirements and to sourcing materials from suppliers that share our values with regard to ethics and integrity, respect for human rights, and environmental responsibility.

Risks and Mitigation

As Intuitive's long-term business success depends on integrity and principled business conduct, Intuitive expects the same commitment to legal, ethical, and social responsibilities from external suppliers who share in Intuitive's business. Intuitive requires its suppliers to comply with various laws and regulations including but not limited to:

52.222-50, Combatting Trafficking in Persons (Feb 2009) (22 U.S.C. 7104(9))52.203-13, Contractor Code of Business Ethics and Conduct (Apr 2010) (Pub.L. 110-252, Title VI, Chapter 1 (41USC 251 note)), Forced labor trade law under Section 307 of the Tariff Act of 1930 (19 USC 1307), which includes the Withhold Release Order (ERO) and Findings, Uyghur Forced Labor Prevention Act (UFLPA) and Countering America's Adversaries Through Sanctions Act (CAATSA); and Articles 2(3) of Directive 2011/36/EU (Offenses concerning trafficking in human beings), California Transparency in Supply Chains Act, UK Modern Slavery Act, and the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Intuitive has assessed that our activities and supply chains did not carry a risk of forced labour or child labour in 2024.

Intuitive will continue its efforts to remain vigilant in this area.

Remediation Measures

As Intuitive assessed no risk of forced labour or child labour in 2024, no remediation measures were taken, including any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

Grievance Mechanism

Intuitive has a formal grievance and remedy process where anyone (including employees, contractors, suppliers or any third-party) can report potential human rights concerns via a Compliance Hotline. The Compliance Hotline is available in all appropriate languages and is hosted by a third-party external firm. Concerns may be reported anonymously, where permitted by law. Intuitive prohibits retaliation for reporting concerns in good faith.

Intuitive takes concerns and allegations reported on the Compliance Hotline seriously, with quarterly summaries provided to the Compliance Committee. Intuitive addresses the concerns and allegations promptly, investigates to the extent necessary and takes disciplinary actions as appropriate (which may include senior management discussions, employee communications, process and controls improvements, individual corrective action measures or reevaluation of business relationships).

Training

Intuitive provides mandatory training to all employees on compliance with corporate policies and procedures, including on preventing forced labour and child labour. Intuitive will continue to develop and enhance employee training to address evolving risks, including forced labour and child labour.

Assessing Effectiveness

We recognize the importance that tracking effectiveness plays in promoting continuous improvement of our approach to supporting human rights, including preventing forced labour and child labour. Intuitive assessed its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains through various mechanisms, including:

- Supplier risk assessment
- Monitoring
- Supplier Code of Conduct
- Supplier Agreements
- Global Supplier Manual

Closing Statement

At Intuitive, we remain steadfast in our commitment to ethical sourcing and supply chain integrity. Through monitoring, supplier engagement, and continuous improvement initiatives, we have implemented robust measures to prevent the scourge of forced labour from infiltrating our supply chain.

As detailed in this report, our efforts encompass comprehensive supplier vetting processes and partnerships to ensure compliance with internationally recognized labour standards. Furthermore, we recognize the importance of transparency and accountability, which is why we are dedicated to openly sharing our progress and challenges in combating forced labour.

While we are proud of the strides we have made, we acknowledge that eradicating forced labour requires sustained vigilance and collaboration across industries and borders. We remain committed to this cause and will continue to work tirelessly to uphold the dignity and rights of all workers throughout our supply chain.

This report has been reviewed and approved by the governing body of Intuitive Canada in compliance with the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report on behalf of the governing body of Intuitive Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

Full name: Jamie Samath

Title: President

Date: May 30, 2025

Signature: Jamie Samath

I have the authority to bind Intuitive Surgical Canada, Inc.