



LEADING THE WAY TOWARDS BETTER  
PATIENT OUTCOMES

# Ethics & Sustainability Policy.

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**2025**

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## Shaping the future of spine surgery.

Evolution Surgical is a pioneering Australian MedTech company dedicated to advancing the field of spine surgery. Our commitment to innovation is driven by our passion for improving patient care and patient value, ensuring that all our technologies have a meaningful, positive impact on surgical outcomes.



# 1. Introduction

At Evolution Surgical Pty Ltd (Company/we) patient care and patient value are core to what we do. We are committed to ensuring our technologies have a meaningful, positive impact on spinal surgical outcomes while operating with environmental and social responsibility.

We prioritise ethical behaviour in line with our legislative and regulatory obligations and business requirements, while striving to meet international best practices for managing environmental, social and governance aspects of our business.

Our ISO-13485 and ISO-9001 compliant quality frameworks and internal protocols ensure our devices positively contribute to patient outcomes. With full control over our products – from design, manufacturing and distribution – we understand the impact our value chain and products have on the environment and society, and the importance of sustainability to investment and business decisions.

# 2. Purpose of this policy

The purpose of this policy is to outline our commitments to integrating ethics & sustainability into our business strategy and operations, and promote sustainable practices amongst our employees, suppliers and stakeholders.

This policy applies to anyone performing work (you/workers) for Evolution Surgical Pty Ltd, including directors, employees, contractors, suppliers and persons acting on behalf of the Company.



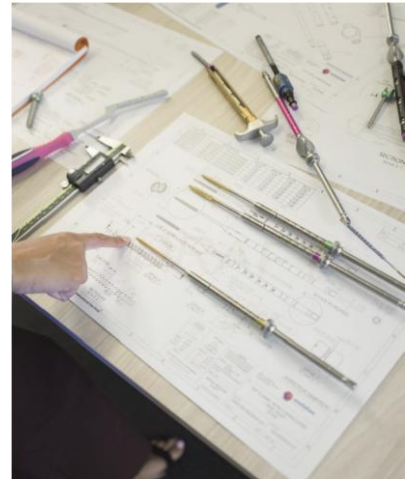
### 3. Our focus areas

Our ethics & sustainability approach is built upon topics that are important to our business operations, and internal and external stakeholders. We have undertaken a materiality assessment to understand the key sustainability-related topics. We identified seven material topics, which are divided into three pillars of focus.

Our focus areas are aligned with the United Nations Sustainable Development Goals (SDGs) and support global sustainability priorities. Additionally, our commitment to the 10 principles of the United Nations Global Compact underscores our dedication to fostering a sustainable and ethical business environment.

PEOPLE	PLANET	GOVERNANCE
<p data-bbox="236 898 501 927"><b>PATIENT OUTCOMES</b></p> <p data-bbox="217 976 520 1041"><b>TALENT ATTRACTION &amp; RETENTION</b></p> <div data-bbox="185 1193 331 1339"> <p data-bbox="197 1211 312 1240"><b>3</b> GOOD HEALTH AND WELL-BEING</p>  </div> <div data-bbox="389 1193 536 1339"> <p data-bbox="402 1211 485 1240"><b>5</b> GENDER EQUALITY</p>  </div> <div data-bbox="185 1375 331 1520"> <p data-bbox="197 1393 325 1422"><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>  </div>	<p data-bbox="687 898 916 927"><b>ENERGY &amp; WASTE</b></p> <p data-bbox="643 976 960 1005"><b>RESPONSIBLE SOURCING</b></p> <div data-bbox="730 1193 877 1339"> <p data-bbox="743 1211 858 1240"><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p>  </div>	<p data-bbox="1062 898 1410 927"><b>CORPORATE GOVERNANCE</b></p> <p data-bbox="1090 976 1382 1041"><b>RISK MANAGEMENT &amp; COMPLIANCE</b></p> <p data-bbox="1045 1090 1426 1120"><b>PRODUCT SAFETY &amp; QUALITY</b></p> <div data-bbox="1155 1193 1302 1339"> <p data-bbox="1168 1211 1283 1240"><b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS</p>  </div>





## 4. Our commitments

<p><b>COMPLIANCE AND ETHICAL CONDUCT</b></p> <p>We will comply with all relevant legislation, regulations, standards, codes and practice to which our company subscribes and uphold the highest standards of ethical conduct in our business dealings.</p>	<p><b>SUSTAINABILITY INTEGRATION</b></p> <p>We will maintain processes to formally identify, assess and mitigate sustainability risks and impacts in a manner that is appropriate to the nature and scale of the risks and potential impacts identified. We will continuously look for opportunities to improve our sustainability performance and set meaningful and measurable targets to monitor progress on matters we consider integral to our business.</p>
<p><b>RESOURCE EFFICIENCY</b></p> <p>We will maintain management systems to minimise the environmental impacts of our business operations, including energy and water use, and waste generation. Where practicable we will consider opportunities to improve resource efficiency and avoid unnecessary waste in product design, manufacturing and distribution.</p>	<p><b>HEALTH, SAFETY AND WELLBEING</b></p> <p>We will implement controls to ensure a safe, healthy and inclusive workplace and foster an environment where all workers feel valued and respected. We will provide employees with the appropriate resources and tools to undertake their duties in a professional and safe manner.</p>



**Shaping the  
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**RESPONSIBLE PROCUREMENT**

As an Australian founded and based business, we are committed to supporting the Australian medical technology industry and where possible making the conscious decision to use Australian suppliers. We will endeavour to support our contractors and suppliers to adhere environmental, human rights, product safety and quality standards. Where applicable, we will seek technologies, processes, products and services that support resource efficiency and minimise our environmental and social impact. We will incorporate environmental and social performance considerations into our supplier evaluations and procurement decisions.

**STAKEHOLDER ENGAGEMENT**

Effective stakeholder engagement enables us to quickly and safely integrate feedback on our devices to improve patient outcomes. We will engage effectively with our stakeholders and develop an awareness of sustainability risks and responsible behaviours across all our workers, contractors and suppliers. We will work collaboratively with our contractors and suppliers to proactively seek opportunities to minimise our environmental and social risks.

**CORPORATE CONTRIBUTION**

We are committed to supporting the Australian medical technology industry and contributing to positive public health outcomes. Our local R&D investments, sponsorship of Australian societies and provision of fellowship funding to support local surgeons and local fellowship programmes are positively supporting the Australian public health system.



## 5. Related policies

This policy outlines our sustainability commitments and is complemented by comprehensive internal policy framework and management systems to support implementation. Our related corporate policies include:

- Anti-bribery and Corruption Policy;
- Anti-discrimination, Harassment and Bullying Policy;
- Conflict of Interest Policy;
- Employee Code of Conduct;
- Grievance Policy;
- Whistleblower Policy; and
- Work Health and Safety Policy.

## 6. Responsibilities

At Evolution Surgical, our sustainability approach is overseen by our Board. A Board member will be appointed as responsible for oversight over our portfolio of sustainability topics and commitments, and reporting performance and progress to the Board and any external stakeholders. Specific responsibilities are detailed below.

### BOARD OF DIRECTORS

Oversee the implementation and effectiveness of this policy and ensure that sustainability is integrated into the Company's governance framework.

### Senior Executives, Officers, Managers and Supervisors

Ensure that all staff are aware of the policy and the Company's commitments. Provide the necessary resources and support to achieve the Company's sustainability goals. Develop and implement management systems and corrective measures to manage environmental, social and governance factors.

### Employees and Contractors

Understand and adhere to this policy and adopt safe and environmentally and socially responsible workplaces. Comply with all internal policies and report unsafe work practices, and any environmental and social issues.

## 7. Monitoring and review

Like all aspects of our business, we are committed to continual improvement. This also applies to our sustainability performance. This policy will be reviewed on an annual basis by the Board and Directors and amended, when necessary, in reference to any legislative or regulatory changes and evolving sustainability priorities for the medical technology industry.



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