

Analogic Canada Corporation

Modern Slavery Act Reporting

May, 30th 2025

This report is submitted by Analogic Canada Corporation (“Analogic”) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, covering the fiscal year from August 1, 2023, to July 31, 2024. As a global medical imaging technology manufacturer, we recognize our responsibility to uphold international labour standards across all tiers of our supply network.

This statement outlines the governance mechanisms, risk management practices, and operational safeguards we have in place to identify, assess, and mitigate the risk of forced labour and child labour in our supply chains. It also outlines our commitments to continuous improvement, transparency, and accountability in line with Canadian legislative obligations.

I. BUSINESS ACTIVITIES AND SUPPLY CHAIN ACTIVITIES

Analogic Canada Corporation is a subsidiary of Analogic Corporation, a global innovator in medical imaging and security screening technologies, headquartered in Peabody, Massachusetts, USA.

Analogic Corporation operates through a focused group of entities that support the research, development, manufacturing, and service of specialized medical imaging solutions. These include:

- **Analogic Corporation (Global HQ – Peabody, MA):** Home to corporate leadership and core engineering operations
- **Copley Motion Systems (Massachusetts, USA):** Specializing in motion control subsystems for MRI and CT systems
- **Analogic Medical Equipment Co., Ltd. (China):** Providing localized manufacturing and support
- **Analogic Canada Corporation (Montréal, Québec):** Center of excellence for digital radiography and flat-panel x-ray detector technologies

Analogic Canada is vertically integrated for the design, engineering, manufacturing, and servicing of flat-panel x-ray detector sub-systems used in digital radiology. The Montreal facility supports advanced R&D, product development, quality assurance, and after-market service for medical imaging clients worldwide.

Analogic Canada sources key components, materials, and subassemblies from a global network of suppliers. These vendors operate across North America, Europe, and Asia, supporting categories such as:

- Thin-film transistor arrays and assemblies
- Printed circuit board assemblies
- Ceramic and scintillator materials
- Embedded electronic components

We engage both Tier 1 suppliers (direct commercial partners) and Tier 2/Tier 3 upstream vendors (via subcontractor channels). To address potential exposure to human rights risks, including

forced or child labour, Analogic Canada has implemented supplier traceability protocols, particularly for high-risk raw materials such as 3TG minerals (tantalum, tin, tungsten, and gold).

Supplier qualification is governed by a critical supplier classification process, which evaluates vendors based on geography, material category, production criticality, and regulatory risk. Suppliers are reviewed at regular intervals through performance audits and compliance checks, in alignment with our Quality Management System (eQMS) and responsible sourcing policies. This structure ensures that Analogic Canada's procurement activities remain traceable, compliant, and aligned with the global standards expected by both the medical device industry and Canadian legislative frameworks.

II. POLICY

Analogic Canada maintains a structured internal control framework to uphold ethical conduct, regulatory compliance, and labour rights protections throughout its operations and supply chain. This framework is anchored in formal policies and procedures that address key risk domains under the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Our policies are developed and maintained within our Quality Management System (eQMS) and are subject to regular review. Together, they establish clear expectations for employees, suppliers, and operational leadership. Key policy areas are summarized below:

Ethical Standards and Business Conduct

Analogic Canada defines ethical expectations for its workforce and external partners through the following policy:

- **POL-003: Business Code of Conduct**
Outlines standards for lawful, ethical behaviour in all business dealings, including supplier relations, non-discrimination, and anti-corruption measures.

Governance and Quality Assurance

Governance, quality control, and supplier compliance are enforced through documented operational standards:

- **POL-016: Quality Policy**
Establishes the foundation for quality oversight across all operational processes, including supplier performance and regulatory alignment.
- **PR-0009: Engineering Change Control**
Defines control points for technical and design modifications to ensure traceability and prevent unvetted supply chain substitutions.

Employment and Working Conditions

Analogic Canada is committed to fair working conditions, equitable scheduling practices, and structured employment policies. These are articulated in:

- **POL-001: Workplace Access Policy**
Governs secure and fair access to company facilities by employees and contractors.
- **POL-004: Evening Shift Policy**
Sets expectations for work hours and entitlements for employees working outside standard daytime schedules.
- **POL-007: New Employee Reward Policy**
Documents recognition and incentives for new employees during onboarding.
- **POL-013: Work Schedule Policy – Salaried Employees**
Details timekeeping and schedule expectations for full-time, salaried staff.
- **POL-023: Work Schedule Policy – Hourly Employees**
Defines rules for scheduling, breaks, and pay for employees paid on an hourly basis.

Workplace Health, Safety, and Dignity

Health, safety, and the protection of employee dignity are central to Analogic Canada's employment practices:

- **POL-002: Policy on the Prevention of Psychological Harassment and Workplace Violence**
Implements a zero-tolerance approach to workplace harassment, including psychological abuse and threats, and defines confidential reporting mechanisms.
- **POL-005: Occupational Health and Safety Policy**
Covers safe working environments and compliance with applicable labour and safety laws.
- **PR-0019: Cleanroom Environmental Control Procedure**
Ensures that environmental conditions within controlled zones meet occupational safety and process integrity standards.
- **PR-0044: Health, Safety, and Environmental (HSE) Prevention Program**
Details proactive measures to reduce workplace safety incidents and reinforce safe work culture.

Training and Awareness

Analogic Canada supports a culture of continuous learning and awareness in areas relevant to human rights and compliance:

- **POL-006: Training and Development Policy**
Covers competency building, onboarding, and knowledge refreshers across operations and compliance domains.

Procurement and Supplier Controls

Procurement procedures ensure that purchasing decisions are aligned with legal and ethical expectations, including supplier accountability:

- **PR-0007: Purchase Order Review and Approval**
Defines internal controls for purchasing, including supplier validation, delegated authorities, and PO tracking.

As a global medical technology organization, we recognize that robust governance is not only a compliance requirement, it is a reflection of our values. Our policies are more than documents; they are active instruments of accountability, embedded into the way we engage with employees, suppliers, and partners.

Oversight of these policies resides at the executive level, and we are committed to reviewing, refining, and enforcing them consistently across the business. This foundation ensures that Analogic Canada operates responsibly, transparently, and in full alignment with the expectations set forth in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

III. SUPPLY CHAIN RISK ASSESSMENTS

Analogic acknowledges that the mining and mineral sourcing sector presents the highest inherent risk within our supply chain, particularly regarding the potential presence of forced or child labour in upstream activities. As a manufacturer of digital radiology detector systems, we rely on electronic components and subassemblies that may contain metals commonly associated with complex global sourcing chains.

We do not directly procure raw minerals. However, we recognize that certain materials, such as tantalum, tin, tungsten, and gold (3TG), are subject to internationally recognized human rights concerns. These metals often pass through a long and opaque value chain that includes mines, traders, exporters, smelters, refiners, and component manufacturers, making full traceability a significant challenge.

Analogic supports responsible mineral sourcing practices and encourages its suppliers to adopt due diligence frameworks consistent with industry standards. We expect suppliers to understand their own supply chains and to engage with smelters and refiners that have been independently verified as conflict-free through third-party audit mechanisms.

To enhance transparency, Analogic has published a public [conflict minerals compliance statement](#), which outlines our expectations for ethical sourcing. While we do not currently conduct formal mineral traceability audits, we remain committed to reducing risk exposure in this area and ensuring that our manufactured products are built on a foundation of responsible sourcing.

IV. REMEDIATION AND MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME

Analogic did not identify any instances of forced labour or child labour within its supply chain or among its suppliers during the reporting period. As no such cases were observed or reported, no remedial actions were required, nor were any measures taken that resulted in a loss of income for vulnerable individuals or communities.

We remain committed to taking appropriate corrective action should any future concerns arise. Our current processes emphasize early detection, supplier accountability, and responsible engagement, with the objective of ensuring that any issues, if identified, can be addressed without creating unintended harm.

V. TRAINING

Analogic Canada maintains a strong Quality Management System, in which employee training is a foundational element. Ongoing training ensures that staff understand their roles in upholding compliance, safety, and ethical standards across all areas of the business.

As part of our commitment to responsible sourcing and regulatory alignment, Analogic intends to expand its training programs to include awareness, prevention, and risk identification related to forced and child labour. These enhancements will support broader internal engagement on human rights due diligence and strengthen our ability to identify and mitigate potential risks within our supply chain.

VI. ASSESSING EFFECTIVENESS

Analogic has not identified any incidents of modern slavery, forced labour, or child labour within its operations or supply chain during the reporting period. As an organization committed to maintaining the highest standards of ethical conduct and legal compliance, we continue to align our practices with evolving regulatory expectations.

VII. APPROVAL

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 for the entity or entities listed above. 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 above.



Luc Lapierre
VP XR Imaging and General Manager
2024-05-30

I have the authority to bind Analogic Canada Corporation

