

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

As a business, ZOLL® maintains relationships with many different organisations in its supply chain, as well as employing directly. In light of the general law on employment and human rights, and more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains. The policy below underpins our approach, and will be used to inform our Statement of Slavery and Human Trafficking to be published each year.

ZOLL® Medical UK Limited has adopted this policy to our corporate values which governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with ZOLL® to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with this policy.

ZOLL® MEDICAL UK LIMITED ANTI-SLAVERY VALUE

As part of our culture of good governance for good business, at ZOLL® Medical UK Limited we operate a set of core values which reflect our relationships with our principal stakeholder groups: customers, suppliers, business partners and team members. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for ZOLL® and expect it of all with whom we have business dealings.

PURPOSE OF THIS POLICY

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of ZOLL® Medical UK Limited (the "Company") with the aim of prevention of opportunities for modern slavery to occur within its business or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

Whilst recognising our obligation to set out the steps we have taken to ensure modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focussed in these areas.
- Engage with our suppliers to both convey to them our Anti-Slavery policy and to gain an understanding of the measures they have taken to ensure modern slavery is not occurring in their businesses.
- Seek to introduce supplier pre-screening and declaration of conformity to the Act prior to commencing any business relationship, including annual reporting for our suppliers on safeguarding controls they have adopted.
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and relationships, both routinely and at times of reasonable suspicion if occurring.
- From financial year 2016 we will include in the directors' report accompanying our annual financial statements a reference to the company's Anti-Slavery and Human Trafficking Policy, which will be available on our website during the summer of 2016.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors for the company has overall responsibility for ensuring this policy and its implementation, comply with our legal and ethical obligations.

Team leaders at all levels of the business are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

In accordance with the company's existing Whistle blower and Code Of Conduct Complaint Policy, all complaints or reports should be sent in a sealed letter or email to our independently appointed lawyer who is ZOLL's contact in the Netherlands. The report should be addressed to Erik Vollebregt, Advocaat, Piet Heinkade 183, 1019 HC Amsterdam, Netherlands. He can also be contacted on telephone number +31647180683 or via email erik.vollebregt@axonlawyers.com

The independent counsel will evaluate each report received and, where appropriate, will report and review with ZOLL's General Counsel. The independent counsel and/or the General Counsel and his/her designee, if appropriate will make the determination of whether the complaint requires immediate investigation and what the appropriate next steps are.

SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The company will accept and take seriously concerns communicated anonymously.

Any claims or allegations made which are found to be malicious in intent will result in disciplinary action being taken against the individual.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

REVIEW

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This policy will be used to inform our Statement of Slavery and Human Trafficking which will be published no later than the publication of our 2016 financial results.