

BRAINLAB **ENVIRONMENTAL** **HEALTH and SAFETY** **MANAGEMENT - FAQ**

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Introduction

Brainlab is constantly improving its processes and products to fulfill the expectations of our customers, patients and employees. The care for a sustainable future encourages additional efforts while providing state-of-the-art medical equipment.

Brainlab is a responsible member of the global community. Various actions have been taken to make Brainlab more “green”. We encourage employees to be environmentally friendly in their daily activities.

Brainlab Environmental, Health and Safety Policy

Together we have the same Goal: Our goal is to conduct business with Integrity, following environmentally sustainable and safe practices to ensure the health of the environment, our employees, customers, community and the patients.

Together we fulfil our Objectives: Brainlab sets the following key objectives:

- Identify, assess and manage the environmental, health and safety risks and impacts of our existing and planned operations to minimize waste, prevent air, water, and other pollution, restrict the use of hazardous substances and dispose waste safely and responsibly.
- Conserve natural resources by reusing and recycling materials, purchasing recycled materials, and using recyclable packaging and other materials.
- Ensure the responsible use of energy throughout our business, including conserving energy, improving energy efficiency, and giving preference to renewable over non-renewable energy sources when feasible.
- Develop, manufacture, and market products that are safe for their intended use, efficient in their use of energy, protective of the environment, and that can be reused, recycled or disposed of safely.
- Maintain a safe and accident-free workplace.

Particularly, an Environmental, Health and Safety (EHS) evaluation is integrated into product design, manufacturing, distribution business processes and services.

Together we are Compliant: Every Brainlab employee is responsible for complying and promote this Policy in consistency with our Code of Conduct. We comply with all EHS laws, regulations, Brainlab procedures and working instructions and other subscribed voluntary initiatives. We will guarantee compliance through audits and implementation of accountable practices, while providing innovative and more effective medical technology.

Together we Engage and Communicate: Brainlab will communicate this Policy internally and to external parties. We provide training and support to implement this Policy and to promote its fulfilment.

Together we continue Improving: Brainlab strives to engage and inspire our employees, customers, suppliers, community and business associates to make positive impacts on the environment. We maintain an EHS infrastructure to assure that our Goal is accomplished.

We will establish EHS targets to continually improve and will publicly report our progress.



Stefan Vilsmeier
President & CEO

Management Responsibility

General Management is reviewing the Quality and the Environmental Management Systems at intervals to ensure its continuing suitability, adequacy, and effectiveness.

Environmental Impacts

The environmental aspects and associated impacts of Brainlab activities, products, and services are assessed. Based on the significance of these potential impacts on the environment, they are mitigated or enhanced by setting objectives, targets, and programs and establishing necessary operational controls.

Health and Safety

Brainlab and its staff must ensure that the working environment is safe and environmentally friendly. It is necessary to follow the established safety rules and practices and to report any identified hazards immediately for mitigation.

Our products are developed, manufactured and marketed in accordance with applicable legal, regulatory and technical standards under the strict control of our quality management systems. We monitor our products in the market, notify the competent authorities immediately and take any necessary measures to enable a safe and effective use of our products.

Prevention and Control

Brainlab will ensure that the necessary prevention and/or control strategies and systems (e.g., engineering controls, programs, procedures, training, etc.) are in place, inherent risks and impacts are addressed, and the EHS system is functioning effectively.

Assessment, prevention and control principles and practices must be applied in the planning, design, and layout of new buildings, processes, products, preventive maintenance activities and/or changes to existing facilities and products.

Emergency response and contingency plans are prepared to address the potential failure of primary prevention and control measures, to respond to accidents and emergency situations, and for preventing and mitigating the EHS impacts that may be associated with them.

Objectives, Targets, Programs and Evaluation of Compliance

Brainlab is establishing objectives, programs and targets to support the implementation of our EHS Policy, for example in new product development. The compliance, achieved results and opportunities for improvement will be identified and evaluated by the indicators being defined accordingly with their related programs.

Training and Education

The appropriate training resources are assigned according to the performed activities. Topics are:

- Corporate policy on EHS compliance

- Identification of inherent EHS hazards and risks
- Identification of significant environmental impacts
- Overview of relevant EHS laws and regulations
- Roles and responsibilities of supervisors and employees in the EHS program
- The importance of reporting EHS incidents and violations of regulations and company standards.
- Education and training for employees.

Common questions and answers related to Brainlab processes and products

Environmental aspects

Do you have environmental policies and practices in place that address general operations and geared to continuous improvement?

Yes, Brainlab has an Environmental, Health and Safety Policy that evolves all Brainlab processes and seeks continuous improvement. Please refer to page 5.

Does Brainlab reduce the energy consumption during the production and of the products to a minimum?

Our suppliers, including those situated outside the European Union, shall fulfill the applicable legal requirements, as well as internal specifications. Brainlab prefers suppliers that follow good environmental practices and are ISO 14001 certified. At Brainlab headquarters, an Energy Management Program is maintained within the Environmental Management System and the following measures are implemented:

- Brainlab Headquarters is LEED Certified (Leadership in Energy and Environmental Design) rate Gold.
- Brainlab prefers to use LED energy saving lamps in common spaces
- Energy-saving heating and air conditioning system adapted to the building's temperature differences
- Motion-activated lights in restrooms and common spaces
- Brainlab "Green Guide for the Office Reloaded" with tips on how to save energy with lights and computers, disposal advice, printing recommendations and more
- Security is advised to turn off monitors during nightly walk-through



Brainlab prefers to use LED energy saving lamps in common spaces.

Does Brainlab use renewable energy (green power, wind power, solar power, thermal energy storage)?

Brainlab uses green energy package. This system provides energy generated from renewable energy sources, such as hydropower, through guarantees of origin, according to Directive 2009/28 / EC of the European Parliament.

What other measures Brainlab takes with regards to sustainable energy?

Brainlab maintains an Energy Management Program and the new headquarters has adopted high standards and achieved LEED Certification (Leadership in Energy and Environmental Design) rate Gold.

The LEED certification was developed in 1998 by the US Green Building Council (USGBC) and has evolved to one of the world's most important voluntary quality inspections in the field of environmentally friendly, low energy consumption, low-emission and sustainable construction in building classification program.

Does the waste resulting from the production is limited or otherwise reused or recycled?

Brainlab maintains a Waste Management Program and recycles metal, electronics, card boxes, paper, lamps, toner cartridges, wooden pallets and food generated at the headquarters. Specific procedures for waste management are documented and personnel is trained accordingly.

Is the waste water from the production processed responsibly?

Brainlab prefers suppliers that work with the best environmental practices and are ISO 14001 certified. At Brainlab headquarters there are water-saving toilets to reduce water consumption. Production itself is not water intensive.

What other measures Brainlab takes with regard to the sustainability of waste / waste management program / recycling program?

Within the Environmental Management System, Brainlab has set a Waste Management Program separating paper, wood, plastic, metal, electronics, lamps, toner cartridges and batteries. The recyclable materials are sent to licensed recyclers and the waste that demands special care is sent to appropriate treatment and disposal.

Brainlab considers the principles of sustainable production and consumption and contributes to prevent generation of unnecessary WEEE. Our products are designed taking into account the possibility to repair, upgrade, re-use, disassemble and recycle, while making medical technology and knowledge more impactful and accessible to physicians and their patients. Our demo systems and portable systems have re-useable packaging.

We recommend that waste from electrical medical devices are recycled and receive adequate final disposal. For further information on the disposal of your Brainlab products, please consult the standard terms and conditions of sale, customer support and/or contact the competent public authorities.

Our software as a service offerings don't require hardware by Brainlab and customers, strongly supporting sustainability and avoidance of waste.



Electronic equipment separated to be recycled.

Is Brainlab compliant with the latest amended Regulation of Hazardous Substances?

Yes, all Brainlab electronic equipment placed in the European market are conform with the latest RoHS directive (2011/65/EU).

Has Brainlab developed a transport plan aiming to reduce the transport movements?

Brainlab has adopted several measures to improve transport movements:

- Reduced business travel through remote customer software support
- Parking spaces for bikes, employees encouraged to ride bikes to work during warmer months
- Emission reduction via freight consolidation



Brainlab stimulates the employees to ride the bike to work and provide safe parking slots for the bicycles.

How does Brainlab ensure that the necessary transportation is done the most sustainable possible way?

Brainlab took following measures:

- Decrease of the business travel through remote customer support
- New Brainlab Headquarters located closer to subway station and has other public transport options
- Parking spots for bikes. In the spring and summer time, the Brainlab employees are encouraged to come to work by bike.
- Reduction of emission through consolidated shipments on one truck
- Electric cars in the company pool car fleet
- Electric charging stations available for employees with electric cars

Can Brainlab provide information about the environmental impact and material composition of Brainlab products and packaging?

Brainlab has implemented processes from the design phase to control material selection avoiding use of the hazardous substances. Packaging material is carefully selected and reused from suppliers when possible. We have also a Packaging Management Program including improvement of product related packaging concept, considering biodegradable plastics and reduction of Styrofoam.

Our software as a service offerings don't require a dedicated hardware by Brainlab and customers, strongly supporting sustainability and avoidance of waste.

Do you take back packaging or provide services for clients to manage packaging using environmentally sound principles?

Brainlab can, upon request, take back packaging material and provide instructions for clients to manage it.

Are products packaged with any post-consumer recycled materials? Is the packaging recyclable? Are products packaged with least amount of material needed for safe transport and use?

Brainlab gives preference for recyclable packaging material and uses the least amount needed for safe transport and use.

Provide proof that Brainlab reduces the use of environmental harmful materials to a minimum (cf. aluminum, heavy metals, etc.)

Brainlab conducts a “Management of Hazardous Substances (MoHS)” Program, which is a system for identification and control of such substances starting from design and throughout our whole supply chain. The focus of this system are substances restricted by RoHS, Reach, POP, WEEE and Battery directives / regulations.



Brainlab conducts a system to manage of hazardous substances on its products.

Does Brainlab have a certified environmental management system in accordance with ISO 14001 or equivalent.

Yes, Brainlab AG, Brainlab Sales GmbH and Brainlab Corporate Services GmbH, located in the Munich Headquarters, are ISO 14001 certified. Brainlab is also certified in ISO 13845:2003 and conducts a “Management of Hazardous Substances (MoHS)” program, which is a system for identification and control of such substances starting from design and throughout our whole supply chain. This system focuses on substances restricted by RoHS, Reach, POP, WEEE and Battery directives / regulations.

We encourage employees to be environmentally friendly in their daily activities, to ensure a successful implementation of our EHS Policy. Examples are in

Facility

- New Headquarters is LEED certified rate Gold
- Brainlab prefers to use LED energy saving lamps in common spaces
- Energy-saving heating and air conditioning system adapted to the building’s temperature differences
- Motion-activated lights in restrooms and common spaces

- Brainlab "Green Guide for the Office Reloaded" with tips on how to save energy with lights and computers, disposal advice, printing recommendations and more
- Recycled paper towels
- Water-saving toilets
- Security advised to turn off monitors during nightly walk-through
- Recycling of: metal, electronics, card boxes, wooden pallets, lamps, batteries, toner cartridges
- Use of eco-energy from local energy supplier
- Use of environmentally friendly cleaning products

Information Technology

Reduction of paper consumption with

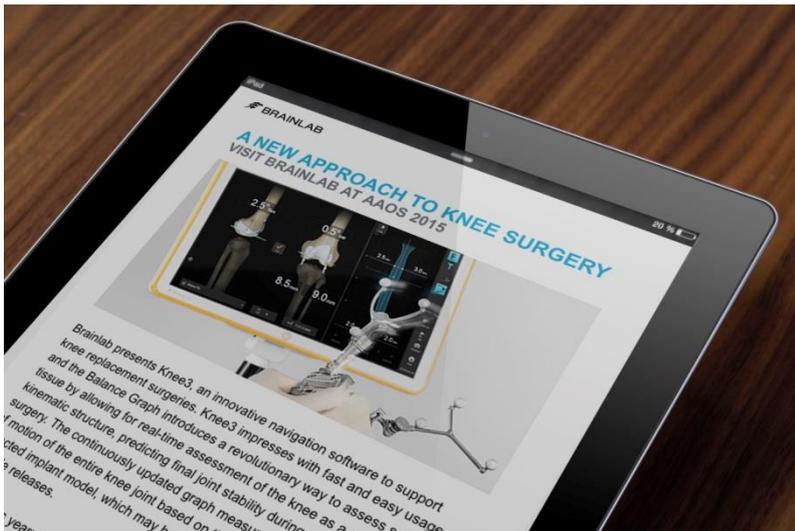
- Different digital newsletters reaching up to thousands of contacts, avoiding paper printings and shipments
- Electronic signatures
- Program to reduce paper for user manuals and technical files
- "FollowMe" print concept: printing only what is needed, double-sided printing as default

Office Material

- Use of recycled paper, 'green' glue, solvent-free markers
- Use of archive boxes for external archiving instead of binders; binders are reused

Transportation

- Reduced business travel through remote customer software support
- New Brainlab HQ in Munich near to subway station and other public transport options
- Parking spaces for bikes and employees are encouraged to ride bikes to work during warmer months
- Emission reduction via freight consolidation
- Electric cars in the company pool car fleet
- Electric charging stations available for employees with electric cars



Digital Marketing: Different digital newsletters reaching up to thousands of contacts, avoiding paper printings and shipments

Does your company engage in voluntary environmental initiatives?

Brainlab stimulates the employees to ride the bike to work, supported by local health insurance.

How does Brainlab assure the measures defined by the Environmental, Health and Safety system are implemented at the suppliers?

Brainlab has stated in the Supplier Manual and Supplier Agreements the requirement to comply with RoHS, Reach, POP, WEEE and Battery directives / regulations. Brainlab may also perform supplier audits. All Brainlab suppliers are also asked to implement an Environmental Management System under the ISO 14001 Standard.

Health and Safety

Does Brainlab have a written Health and Safety Policy?

Yes, please see page number 5.

Does Brainlab have an Occupational Health and Safety Management System certified by a recognized independent authority (e.g. SafetyMAP)?

Brainlab does not hold a OH&S certification, but we follow OSHA's guidelines and other internal policies, practices and procedures that mitigate work related hazards and environmental harm and support sustainable practices. We perform risk assessment audits with the support of external consultants. Emergency and first aid procedures are in place and trained regularly.

Does Brainlab have an Occupational Health and Safety Management manual or plan?

Yes, Brainlab maintains safety processes updated and performs risk assessment of the work environment and employees' activities. Audits are carried with the support of external consultants, while the results are documented and measures applicable to every identified hazard are taken with the support of managers in communion with related employees.

Does Brainlab have a written Customer Service Policy?

Brainlab has several standard operating procedures and work instructions to guide best practices in customer service, including a Customer Satisfaction Procedure based on the Net Promoter Score (NPS).

Do products contain mercury?

Currently, mercury is included in the list of restricted substances of EU Regulations Reach, RoHS and Batteries. The Reach regulation allows a maximum concentration of 0,1% of the chemical substances in the whole product weight, while RoHS restricts to 0,1% weight/weight in the component level. The battery directive prohibits the use of mercury in all batteries (including button cells, as of 2 October 2015).

Brainlab conducts a systematic check with our suppliers and Brainlab products are in accordance with the current directives and regulations.

The currently certified Environmental Management System includes a Target to “Implement additional Mercury control in new articles before 2019”

Do products contain any persistent bioaccumulative toxic (PBT) chemicals?

Persistent bioaccumulative chemicals are included in the POP Regulation, on persistent organic pollutants. Brainlab products are conform with this regulation.

Social Aspects

Does Brainlab subscribe to the International Labour Organization (ILO) declaration on fundamental principles and rights at work?

Yes.

Does Brainlab attach value to the Social Return for example by providing employment to people with a distance to the labor market (apprenticeships, internships etc.)?

Each year Brainlab offers apprenticeships to young people who want to combine school with appropriate work experience. These young "Auszubildende" get after three years of work experience, a certificate from the Chamber of Commerce. In addition to these apprenticeships, students have the opportunity to do internships in various departments (R & D , HR, Marketing, Sales , etc.). About a hundred students have an internship or a student job at Brainlab per year.

Brainlab also attaches great importance to a good balance between work and private life. Brainlab therefore offers the possibility to parents to work part-time.

What does Brainlab do with respect to social norms?

Brainlab contributes to global access for healthcare and asks suppliers to meet the following social and ethical requirements:

- Operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations
- Employees must meet minimum legal age requirement
- Wages and working hours must be set in accordance with applicable laws. Employees shall receive at least the minimum legal wage or a wage that meets the local industry standard, whichever is greater
- No forced labor
- No discrimination of employees based on race, origin, gender, religious beliefs, disability, age, maternity or sexual preference
- Employees must be given freedom of association

Brainlab has an Integrity & Compliance Program. Compliance within Brainlab is closely linked to one of the company's core values: Integrity.

Brainlab sponsors the Right.Brain Foundation e.V, which will provide medical technology and education to selected hospitals and public institutions in Southeast Asia, Africa, Central and South America.

Right.Brain provides an exchange program to help teach physicians in developing countries how to use the technology effectively.

Some Brainlab employees volunteer their vacation time to Right.Brain to provide additional on-site training and support to local hospitals.



right.brain

The Right.Brain Foundation provides medical technology and education to select hospitals and public institutions in Southeast Asia, Africa, Central and South America.

Does Brainlab have a UK Modern Slavery Act statement?

Yes, you can find the Brainlab Ltd statement at www.brainlab.com/en/sustainability.