



MODERN SLAVERY ACT TRANSPARENCY STATEMENT

PROCEPT BioRobotics Corporation

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PROCEPT BioRobotics Corporation and its subsidiaries, including PROCEPT BioRobotics UK Ltd (collectively, “**PROCEPT**” or “**we**”), operate with high ethical business standards and integrity in all aspects of our business and geographies. We rely on our global network of suppliers, sales representatives, and business partners to commit to and uphold the same high standards and ethics.

We are committed to human rights and the mitigation of modern slavery, and compliance with local laws, through the way we operate as a business and the relationships we develop.

Our Organizational Structure and Our Business

PROCEPT, headquartered in San Jose, California, is a medical device company focused on developing and commercializing products intended to revolutionize the treatment globally for benign prostatic hyperplasia, or BPH, the most common prostate disease that affects more than 40 million men just in the United States. In partnership with urologists, we aim to improve the quality of life of millions of patients by delivering best in class surgical robotic solutions.

Our Team

We currently employ approximately 626 people worldwide. The vast majority are based in the United States, and a few employees located in the UK, the EU, and Japan. Our employees are pivotal to our growth and success and valued as a vital stakeholder. We are committed to treating all our employees fairly and openly and to creating and maintaining safe working environments. We prohibit discrimination and harassment against employees, applicants for employment and individuals providing services in the workplace pursuant to a contract, based on any protected characteristic as outlined in our PROCEPT BioRobotics ESG Report.

Our Supply Chains

We manufacture our products using parts purchased from a global network of approved suppliers. Our suppliers are selected for their ability to meet our specifications and compliance to rigorous quality system requirements. We believe that building healthy and long-lasting partnerships are key ingredients for the success of any organization.

Due Diligence: Supplier Assessments and Qualification

Before contracting with a component supplier, each supplier is put through a thorough evaluation process, which include supplier questionnaires and assessments of supplier

facilities, as applicable. We communicate our expectations for compliance with quality standards to all potential suppliers. We are also near complete with activities necessary to support our first-time certifying compliance with US requirements related to “conflict minerals”. These activities include requiring that suppliers confirm whether conflict minerals are used in the components supplied to us and, if so, where such conflict minerals are sourced.

Furthermore, as part of our component supplier evaluations, all suppliers are audited to the requirements of U.S. FDA Quality System Regulation, EN ISO 13485, 93/42/EC European Medical Device Directives, and/or 2017/745, European Union Medical Devices Regulation. We endeavor to select suppliers that comply with these requirements to ensure the appropriate standards of quality for medical devices. Although we do not currently audit supplier compliance with our standards for human trafficking and slavery, we regularly audit suppliers to mitigate the potential for impact to our quality system. We have a rigorous supplier monitoring program internally that assess for supplier performance against key performance indicators, and we have established protocols for communicating with suppliers on a regular basis to provide appropriate and relevant feedback.

Assessing and Managing Risk

We note that assessing and managing risk is an ongoing obligation, and we have taken various steps to date, and continue to take, towards this goal:

Our Code of Business Conduct and Ethics

Our Code of Business Conduct and Ethics (“**Code of Conduct**”) outlines our expectations for business conduct and practices, including provisions on conducting business ethically and in compliance with legal standards and our commitment to a safe working environment for our employees. We do not use or condone slave labour or human trafficking; we denounce the degrading treatment of individuals or unsafe working conditions. Additionally, we support our products being free of conflict minerals.

The Code of Conduct requires strict adherence and specifically states that each employee and member of the Board of Directors has an obligation to comply with all laws, rules and regulations applicable to the Company’s operations. This code of conduct is reviewed on a regular basis to ensure comprehensiveness.

Supplier Code

We have not yet implemented a requirement that all our suppliers abide by the terms of a supplier code of conduct (a “**Supplier Code**”) and intend to implement such requirements as PROCEPT grows. We would like such a Supplier Code to highlight our expectations and guidelines with respect to the conduct of our suppliers, including commitments to human rights, the environment, health and safety, business ethics.

Supplier Agreements

We have supply agreements, quality agreements and/or purchase order terms and conditions with our suppliers. These contracts include provisions regarding compliance with all laws and regulations applicable to the supply of the product or service. We require compliance with applicable laws and regulations, and we reserve the right to terminate any supplier that does not comply with our agreements or applicable laws and regulations.

Internal Accountability

Our employees have a duty to report any known or suspected violations of our Code of Conduct or any laws, rules, or regulations applicable to us. Our Ethics Hotline, a telephone and web resource, is available to report or seek guidance on issues. The Company's Ethics Hotline that is available 24 hours a day, 7 days a week, on the Internet at <https://procept-biorobotics.ethicspoint.com/> and may be used anonymously.

To promote compliance with our Code of Conduct, we maintain a compliance program and take disciplinary action when necessary. All allegations of violations of our Code of Conduct are investigated, and appropriate responsive action is taken as required. If any employee is found to be non-compliant in an area, we would take prompt corrective action. It is Company policy that any employee or member of the Board of Director who violates the Code of Conduct would be subject to appropriate discipline, which may include, for an employee, termination of employment or, for a member of the Board of Directors, a request that such Board member resign from the Board of Directors of the Company.

Training

Although we do not provide our employees with specific training in slavery and human trafficking, all of our employees, including those responsible for supply chain management, must comply with our Code of Conduct. All employees participate in annual training on our policies to ensure continued understanding and compliance.

This statement made pursuant to section 54 of the UK Modern Slavery Act 2015 and is given on behalf of PROCEPT BioRobotics Corporation and its subsidiaries for the financial year ending 31 December 2023. It sets out the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains. This statement was reviewed and approved by our Board of Directors on April 25, 2024.

/s/ Reza Zadno

Reza Zadno, PhD

President, Chief Executive Officer and Director

PROCEPT BioRobotics