

FocalTherics
Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by EDAP TMS S.A. d/b/a FocalTherics (“FocalTherics”, “we” or “the Company”) during the financial year ended 31 December 2025 to identify and reduce the risk of modern slavery and human trafficking in our operations and supply chains. We are committed to acting ethically and with integrity in all of our business dealings and to preventing modern slavery in any part of our business or supply chain.

1. Our organization and supply chains

FocalTherics is a medical technology company that develops and commercializes the Focal One robotic high-intensity focused ultrasound (HIFU) platform for the treatment of prostate cancer. Our supply chain comprises approximately 975 tier-one suppliers of goods and services, including components and electronics, facility management, information technology, professional services and logistics. The substantial majority of our suppliers are located in lower-risk jurisdictions, principally France, Germany, the United Kingdom, the United States and other Western European countries.

2. Our assessment of risk

During the period we carried out a risk assessment of our supplier base using recognized indicators of modern slavery risk, including country-level prevalence and vulnerability and sector-based markers. Of the approximately 975 suppliers assessed, around 98% were assessed as low risk, a small number (16) were assessed as medium risk on the basis of country of origin and sector, and none were assessed as high risk. we are not aware of any instances of modern slavery in our operations or supply chains during the period. We consider the overall risk of modern slavery in our supply chain to be low. We give closer attention to suppliers in higher-prevalence jurisdictions and in sectors with elevated inherent risk, such as manufacturing and electronics, logistics and certain outsourced services.

3. Policies

Our Code of Business Conduct and Ethics sets out the standards of conduct we expect of our directors, officers, employees, consultants and contractors. In support of this statement, we are committed to the following principles in relation to modern slavery, and we expect our suppliers to uphold the same standards:

- we prohibit the use of forced, bonded, involuntary or child labour;
- we prohibit the withholding or confiscation of workers' identity or immigration documents;
- we prohibit the charging of recruitment fees to workers;
- we prohibit compulsory overtime and support humane and lawful working hours;
- we respect freedom of movement, freedom of association and the right to collective bargaining;
- we prohibit discrimination, harassment, intimidation and any harsh or inhumane treatment;
- we support the payment of wages that meet at least applicable legal or industry minimum standards; and
- we support access to remedy for any person affected by modern slavery connected to our business.

4. Due diligence

We operate supplier qualification and oversight processes as part of our supplier onboarding. Building on our supplier risk assessment, we are taking a risk-based approach to due diligence. During the coming year we intend to incorporate modern slavery and human rights expectations into our supplier onboarding and contracting, to focus enhanced due diligence on suppliers identified as medium risk or operating in higher-risk sectors, and to require suppliers to confirm their compliance and to provide supporting information on request.

5. Training and awareness

We require relevant members of staff to read and acknowledge our policies and this statement at induction and whenever they are materially updated. We are introducing modern slavery awareness materials for staff whose roles are most

likely to involve modern slavery risk, including those responsible for procurement and supplier management.

6. Measuring effectiveness

We monitor our progress through measures that include staff completion of policy acknowledgements, the annual review and refresh of this statement and our supplier risk assessment, and the recording and resolution of any modern slavery concerns raised. These measures are reviewed by senior management.

7. Raising concerns

We encourage anyone with a concern, including a suspected case of modern slavery, to raise it through our hotline, which is operated by an internal control office based at headquarters in France, where a secure device has been set up, via the e-mail address: AlerteProfessionnelle@edap-tms.com, and provides for confidential and anonymous reporting for those who desire to remain anonymous. We do not tolerate retaliation against any person who raises a concern in good faith.

8. Our plans for the coming year

Over the next twelve months we intend to:

- embed modern slavery and human rights provisions into our supplier contracting;
- carry out enhanced due diligence on medium-risk suppliers and higher-risk sectors;
- roll out modern slavery awareness training to relevant staff;
- complete the Government's online Modern Slavery Assessment Tool; and
- review and refresh this statement and our supplier risk assessment annually.

9. KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

- Governance & due diligence
- Procurement & supply chain
- HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- The number of modern slavery cases identified and remediated
- Update of the Modern Slavery Statement and completion of the MSAT yearly
- Annual modern slavery risk assessment of suppliers conducted
- Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

Senior Management Approval

SIGNED: 

NAME: Sanket Shah

JOB TITLE: General Counsel

DATE: 18 June 2026