



Modern Slavery Statement

Paragon 28 is a medical device company that designs and manufactures implants and instruments used in the treatment of all foot and ankle surgical ailments. We are committed to conducting business with integrity and adhere to the highest standards of ethical behavior and transparency within our corporate dealings. Paragon 28 is aware of our responsibilities towards our workforce, customers and partners and have zero-tolerance towards slavery or human trafficking. Paragon 28 does not endorse any form of modern slavery in our operation or our supply chain.

UK Modern Slavery Act 2015

This statement is made pursuant to s. 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year 2023.

Policies/Procedures

We are dedicated to ensuring that human rights are protected, and compliance is upheld to all applicable laws and regulations. We have implemented policies to safeguard against any form of slavery or human trafficking within our supply chain; policies include Whistleblowing, Due Diligence, Supplier Management, Employee Code of Conduct which includes Human Rights, Anti-Trust, Anti-Bribery, Corruption, Anti-Money Laundering, Freedom from Harassment, Equal Opportunity. In addition, we have a third-party, independent, and confidential hotline that serves as a mechanism for our workforce, vendors and customers to report any alleged unethical behavior.

Our Supply Chain

We require our suppliers to disclose third party relationships to ensure operations are conducted in a manner consistent with our values. Within our supply chain, we consider the main areas of risk to be in the outsourcing of manufacturing and subsequent acquisition of raw materials. Our supplier management program includes a Supplier Quality Agreement that outlines requirements for Supplier controls to be defined in policies, procedures and/or statements. Due diligence is

in place within onboarding and monitoring of activities that includes scheduled on-site visits, evaluations of activities performed, and audits that include verification of compliance to applicable regulations/laws/certified standards.

To-date, the effectiveness of our actions across our business has resulted in no potential risks identified within our supply chain.

Our Ongoing Commitment

Paragon 28 strives to improve our dedication in reducing risks associated with modern slavery and human trafficking year over year. We believe that an effective prevention of slavery occurring in any part of our business, is through training and awareness. We promote awareness by publishing this Statement on our website. In addition, our workforce is made aware through training on policies and procedures required upon hire, as well as annually on our Code of Conduct. In 2023, policies were implemented to include Paragon 28's Modern Slavery Statement. Lastly, we have requirements to review policies and procedures at scheduled intervals, of which our workforce is trained upon any changes.

At Paragon 28, we understand that the risks associated with human rights evolve as a company's undertakings and corporate relationships change, which is why we have created structure within our business to continuously evaluate these changes and their potential effect.

Approvals



Signature



Signature