

Sammanfattning av uppföljningsresultat

Nedan ges en sammanfattning av en uppföljning av hållbarhetskrav på en leverantör till Sveriges regioner. Sammanfattningen är en återgivning av revisionens resultat samt aktiviteter till följd av den. Sammanfattningen har fyllts på allteftersom nya aktiviteter kopplade till uppföljningen genomförts, fram till dess att samtliga eventuella avvikelser hanterats och uppföljningen anses avslutad.

För frågor gällande sammanfattningen, kontakta det Regionala Kansliet för Hållbar upphandling

www.husr.se

Logg

Senast uppdaterad

260130

Allmän information

Leverantör	Boston Scientific Nordic
Organisationsnummer	556379-4139
Regioner med avtal	Region Västernorrland AV-2024-436
Prioriterad inköpskategori	Pacemaker/CD
Produkt	Pacemaker/CD
Revision / Återrevision	Revision
Typ av uppföljning	Kontorsrevision digital
Krav	Sustainable Supply Chains och Systematic Environmental Management
Start revision	251119
Datum för revision	251119
För mer info	Ulrika Ejnarsson, Ulrika.Ejnarsson@regionhalland.se

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Revisionsresultat

Sammanfattning av revisionen

Leverantören bidrog till en revision som sträckte sig över två dagar, med deltagande från den globala organisationen. Revisionen visade att man hade ett policyramverk och system för att identifiera tvångsarbete i en region i Kina, i enlighet med den amerikanska lagstiftningen UFLPA, men att man inte hade integrerat övriga hållbarhetsrisker kopplade till avtalsvillkoren

Resultat revision

Hållbara leveranskedjor

Bedömning*

1. Policyåtagande	251119
2. Vidareförmedling av krav	251119
3. Ansvarsfördelning	251119
4. Riskanalys	
5. Uppföljning	
6. Avvikelsehantering	
7. Tillträde till produktionsanläggningar	251119

Systematiskt miljöarbete

Bedömning*

1. Systematiskt miljöarbete	251119
2. Miljöpolicy	251119
3. Miljöutredning	251119
4. Mål och handlingsplan miljö	251119

Förklaringar

Avvikelse	
Inga identifierade avvikelser	

*För en detaljerad beskrivning se Bilaga 1. Avvikelser

Nästa steg

Återrevision inom sex månader

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Bilaga 1 - avvikelser

Hållbara leveranskedjor

Avvikelse

Risk analysis

The auditor finds that the supplier's routine meets the contractual requirements for basic risk identification, supply-chain mapping and risk prioritisation, supported by detailed trade-flow analytics and a structured validation process for the sole issue of forced labour in China. The system does not manage the broader set of sustainability risks that the supplier is contractually required to manage. These include the UN Universal Declaration of Human Rights, the eight ILO core conventions on forced labour, child labour, discrimination and freedom of association; the rights of the child under Article 32 of the UN Convention on the Rights of the Child; national labour-law and social-security requirements; occupational safety and health legislation; environmental protection legislation; and the UN Convention against Corruption. These areas are not systematically assessed through external datasets, and the SOP focuses exclusively on UFLPA indicators. As a result, other types of human-rights, labour-rights, safety, environmental and anti-corruption risks may not be fully identified.

Leverantörens åtgärd

Summary of Actions

In order to address the auditors' concerns linked to Boston Scientific's risk analysis and integration of a broader set of sustainability risks, BSC intends to

- Action 1: Expand the scope of Boston Scientific's current risk assessment by incorporating additional external datasets and sources into the current supply chain mapping platform to enable systematic identification and prioritization of a broader set of sustainability risks across the value chain. The risk assessment will cover relevant suppliers and upstream production stages based on a risk-based and severity-driven supply-chain mapping covering the entire value chain. This adjusted supply chain risk assessment will address all sustainability risk areas under the contract including human rights, labor rights, occupational health and safety (OHS), environmental and anti-corruption risks, in addition to forced labor risks.
 - a. Examples of additional databases to ensure coverage of all sustainability risk areas: ILO ILOSTAT Database, World Bank Worldwide Governance Indicators and UN SDG Global Database.
- Action 2: Develop a comprehensive group-wide sustainability due diligence policy defining the scope, governance and processes for the identification, assessment and prioritization of sustainability risks in Boston Scientific's own operations and supply chain, ensuring that risk assessments are conducted systematically and in line with the contractual agreements and internationally recognized standards and regulations.

Boston Scientific has already confirmed with the current supply chain mapping platform, the following list of external data sources can be immediately integrated in Boston Scientific's risk management and monitoring system:

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1. EU Sanctions Map Human Rights Regimes
2. UK Modern Slavery Statements Registry
3. European Commission Database on Forced Labor
4. OECD Due Diligence Guidance Data and Risk Indicators

Tidplan

Action 1

Integration of new risk scope and data sources: Q1-Q2 2026

Action 2

Global sustainability due diligence policy:

2.1. Initiation and development: Q1 2026

2.2. Approval and publication: Q3 2026

2.3. Roll-out and implementation:

Q4 2026 and rolling

Avvikelse

Monitoring

The monitoring framework is narrowly focused on UFLPA indicators and does not yet extend to the wider sustainability requirements that apply under the contractual obligations. There is presently no systematic monitoring of risks related to the UN Universal Declaration of Human Rights, the ILO core conventions, children's rights, national labour and OSH legislation, environmental law or anti-corruption standards. The absence of these elements means that important categories of human-rights, labour, safety, environmental and governance risks may go undetected.

Leverantörens åtgärd

Summary of Actions

In order to address the auditors' concerns linked to Boston Scientific's sustainability risk monitoring and follow-up, Boston Scientific intends to complete following actions:

- **Action 3: Adjust Boston Scientific's risk monitoring framework** to ensure that sustainability risks identified through risk analysis are systematically reviewed, prioritized based on severity, and monitored across the entire value chain and covering all contractually required sustainability areas, including human rights, labor rights, OHS, environmental and anti-corruption risks, in addition to forced labor.
- **Action 4: Define and incorporate a monitoring and follow-up process into the new Global Sustainability Due diligence Policy**, ensuring that prioritized sustainability risks trigger appropriate follow-up measures in Boston Scientific's own operations and supply chain.

Triggered by Actions 1 and 2 described in Deviation 1, Boston Scientific will update its risk monitoring framework based on the broadened scope of sustainability risk indicators in **Action 3** and **Action 4**.

Actions 3 and 4 are dependent on the completion of Actions 1 and 2 described in the section for Deviation 1.

Tidplan

Action 3

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Adjustment of Boston Scientific risk monitoring framework
Q1-Q2 2026

Action 4 Incorporation of monitoring process approach: Q1 2026

Avvikelse

Deviation management

The deviation functionality has however so far not been used for sustainability related issues, as the supplier has not managed any deviations connected to sustainability.

The deviation management is not based on a risk analysis that encompasses the entire supply chain and covers the basic conditions. Consequently, the supplier has not found any deviations connected to the sample product, since the scope is limited.

Leverantörens åtgärd

Summary of Actions

In order to address the auditors' concerns linked to Boston Scientific's deviation management for sustainability-related issues, BSC intends to complete following actions:

- **Action 5: Update Boston Scientific's deviation management system** to ensure that sustainability-related risks and non-compliances identified through risk monitoring, supplier assessments or other follow-up activities are managed in practice through a defined, risk-based and severity-driven deviation management process. Ensuring that the process includes the recording of deviations, prioritization of deviations based on severity and potential impact, escalation in line with internal governance, definition of corrective actions, and tracking to closure across Boston Scientific's own operations and supply chain.
- **Action 6: Update and incorporate a sustainability deviation management process into the new Global Sustainability Due diligence Policy**, clarifying the application of a risk-based, severity-driven deviation management methodology aligned with international standards and guidance, and ensuring that all contractually required sustainability areas are systematically covered.
- **Action 7: Update and improve the documentation describing Boston Scientific's sustainability deviation management process** to clearly outline roles, responsibilities and end-to-end workflow for managing sustainability deviations in practice.

Triggered by Actions 1 and 2 described in Deviation 1, Boston Scientific will adjust its deviation management system to reflect the broadened scope of sustainability risk indicators.

Actions 5 and 6 are dependent on the completion of Actions 1 and 2 described in the section for Deviation 1.

Tidplan

Action 5

Adjustment of Boston Scientific deviation management system: Q1-Q2 2026

Action 6 Incorporation of deviation management process approach into the Global Sustainability Due diligence Policy: Q1 2026

Action 7

Improved description(s) of BSC deviation management process: Q1-Q3 2026

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