
Anti-Slavery and Human Trafficking Policy Pursuant to the Modern Slavery Act 2015

Issue	Date	Summary and reasons for changes
1	Financial Year 2017	Policy Implementation
2	Reviewed March 2018	No changes made except FY dates

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Introduction

This statement sets out Eurofin's actions in the UK to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 Jan 2018 to 31st December 2018.

As part of Eurofins involvement in the Bioanalytical Testing Market, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers the activities of Eurofins in the UK:

- Eurofins is an international life sciences company which provides a unique range of analytical testing services. The UK operation is part of a global network of laboratories operating over 40 countries. Each country operates with its own independent entities and management structure.
- Eurofins offers a portfolio of over 150,000 analytical methods for evaluating the safety, identity, composition, authenticity, origin and purity of biological substances and products, as well as for innovative clinical diagnostics.
- The Group objective is to provide its customers with high-quality services, accurate results delivered on time and supported by expert advice from its highly qualified staff.
- Within the UK the company operates across 16 sites located in England, Wales and Ireland with its key focus on testing within the Food, Water, Pharma and forensics markets as well as consumer product testing, agro, agro science, genetics and digital product testing.

Policy on Slavery and Human Trafficking

Eurofins commits to developing and adopting a proactive and robust approach to tackling hidden labour exploitation and human trafficking. This includes:

- **Slavery** – victims are deprived of their freedom and forced to work
- **Human / Child Trafficking** - people are moved, often internationally, so that they can be exploited
- **Forced Labour** – people are forced to work against their will for little or no pay, often under the threat of violence to themselves, family or friends
- **Debt Bondage** – victims work to pay off debts that they have no realistic chance of being able to bring to an end

Slavery and human trafficking are abhorrent crimes and all of the Eurofins team have a responsibility to ensure this does not take place within our business. At Eurofins we will take every effort to conduct our business in an ethical and responsible manner. As an employer we are committed to paying at least the national living wage and we regularly review our terms of employment to ensure they comply with the relevant UK legislation. We procure goods and services from a vast number of suppliers and are committed to doing what we can to combat slavery and human trafficking throughout our supply chain.

Forced labour can include the exploitation of job applicants and workers by third party individuals and gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management including payment for work-finding services and work related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive themselves as such, reluctant to come forward making their situation and concerns known.

Our anti-slavery and human trafficking statement reflects our ongoing commitment to act ethically and with integrity in all our business relationships and to implement and enforce systems and controls that seek to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Eurofins does not, and will not, support or deal with any business or company knowingly involved in slavery or human trafficking in any part of its operations remotely or indirectly. In the event that we suspect a breach of The Modern Slavery Act 2015, we would report the perpetrator(s) and immediately cease trading / dealing with such businesses.

Responsibility

As part of our initiative to identify and mitigate risk within our business and our supply chains we have taken the following actions:

- Our Managing Director(s) are responsible for putting in place and reviewing policies which are reviewed on an annual basis
- Our employees are made aware of this statement which is held on our employee intranet and displayed on our company website. Employees are encouraged to identify and report any suspicions or concerns they may have with their line manager
- We expect our suppliers to adhere to all legislation relating to The Modern Slavery Act 2015 and we make clear our expectations of business behaviour
- We promote and support the 'stronger together' initiative that aims to work with multiple stakeholders to reduce modern slavery, particularly with regard to hidden forced labour, labour trafficking and other third party exploitation of workers

Relevant Policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing / Speak Up policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's 'Speak Up' (whistleblowing) procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can follow the detail within the Speak Up Policy which is communicated to new starters when they on-board, through our induction programme and our staff handbook and is consistently available on our internal intranet and company notice boards.
- **Employee code of conduct** - The Company's code makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Purchasing code of conduct** - The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment / Agency workers policy** - The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Minimal numbers of agency workers are used with the company having a high focus on employing permanent, salaried and well trained employees

Due Diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- Ensuring all those in our supply chain and labour providers adhere to current legislation, we aim to evaluate our key suppliers on various aspects of corporate social responsibility; where suppliers fall short on our expectations we endeavour to take steps to improve suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- Requiring new suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Through the implementation of this programme, we ensure a responsible supply chain that shares our company values, ideas, practices and sustainable policies
- Our HR Department has measures in place to monitor the terms through which Eurofins employees are engaged and remunerated. We minimise the use of agency and maximise our employment of permanent, salaried staff.

Training & Support

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide relevant information and support to our staff to ensure compliance in this area. Senior Management are briefed on this subject.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the Financial Year ending December 2017.