

Modern Slavery and Human Trafficking Policy Statement

Introduction

This statement sets out Eurofins Forensic Services actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring 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 January 2022 to 31 December 2022.

Although this issue is low risk within our organisation, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic. Our organisation 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.

Organisational structure and supply chains

This statement covers the activities of Eurofins Forensic Services:

Eurofins Forensic Services Limited is a national forensic science business providing services to customers in the security sector, as well as with governments and academia. Eurofins Forensic Services Limited is headquartered in Wolverhampton with offices in England and employs in excess of 600 people.

The risk associated with modern slavery including our wider supply chains is low as a consequence of the high specialised nature of our business. The vast majority of our suppliers are located in low risk sectors and geographies. Our suppliers are predominantly based in the UK and EU. The majority of our employees are permanent, many of whom are graduates or doctorates. Nonetheless, as part of our initiative to identify and mitigate risk, we conduct due diligence, financial, and vetting checks on all new suppliers, employees, contractors, sub-contractors, distributors, agents, and customers. These checks help identify and verify that such parties are not involved with, or suspected of, modern slavery, bribery, corruption or other unlawful activity.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The Senior Leadership Team and Human Resources are responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** Risk assessments are undertaken by Business Unit Managers, Procurement or Quality and Compliance and are overseen by the respective member of the Senior Leadership team. Our assessments are based on the perceived risk of modern slavery in the particular sector/industry in which supplier/subcontractor operates. We have a 5 tier rating system, from very low to very high in which we have allocated supplier categories. We currently have no supplier with a rating above Moderate.
- **Investigations/due diligence:** Undertaken by the Quality and Compliance team as part of their audits of suppliers and subcontractors, and by procurement as part of supplier selection and onboarding processes.

- **Training:** During 2022 we used training, centred on the GLAA's resources, to better understand and respond to the identified slavery and human trafficking risks.

Relevant policies

Many of our existing policies reflect our commitment to act with integrity and respect in all our business interactions and therefore minimise the risk of modern slavery in our business and wider supply chain. All our scientific staff sign up to a Code of Conduct which is in line with the Forensic Science Regulator's Codes of Practice and Conduct. Our employees are accountable for compliance with company policies and procedures which includes a requirement to ensure EFS operates in compliance with the law.

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our 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 use our confidential helpline/complete our confidential disclosure form. In response to any whistleblowing we will flag as a high-risk security incident and enact an investigation in line with the standards mandated in our Quality Manual, being 24 hours for reporting in our system and 10 working days for completion of the investigation. During this time the alleged victim of Human trafficking would be provided access to support. In case of a positive finding we would support the victim in securing compensation and justice.

- **Employee code of ethics** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Our standard terms of procurement require suppliers to comply with all applicable laws in the provision of products and services to us. We typically reserve the right to conduct supplier audits to underpin this requirement.
- **Recruitment/Agency workers** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. Specifically, we prohibit the use of worker-paid recruitment fees, compulsory overtime, and confiscation of worker ID documents.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking (and we have determined that our supply chain is at low risk);
- evaluating the modern slavery and human trafficking risks of each new supplier (either by self declaration, contractual requirement or audit as appropriate based on the risk profile);
- reviewing the supply chain at least annually to confirm or alter our risk ratings based on the supply chain mapping;

- conducting supplier audits or assessments through our Quality and Compliance Team, which have a greater degree of focus on slavery and human trafficking where high risks are identified.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring employees to have completed training on modern slavery as part of their induction or, if employed before 2022 to undergo annual refresher training;
- developing a system for supply chain verification expected to be in place during 2022, whereby we evaluate the risk of potential suppliers before they enter the supply chain.

Training

We require all staff within our organisation to complete training on modern slavery during induction, if employment started during 2022, and at least annually as part of their ongoing CPD

Our modern slavery training covers :

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected; and
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.

Eurofins Forensic Services Limited is not aware of any established instance of modern slavery in our business or wider supply chain. As our business continues to grow, we are committed to integrating our businesses with uniform policies and procedures which highlight and educate our employees and suppliers of the risk of modern slavery. As such, identification and management of modern slavery risk will continue to inform the update of our compliance processes and policies.

This statement is made in connection with Section 54, Part 6 of the UK Modern Slavery Act 2015 in respect of the financial year 2022 and is reviewed and updated at least annually.

Signed version available upon request

Andrew Nelson

Managing Director

Date: 8 Sept 2023