
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 |
| 3 | Reviewed January 2019 | No changes made except FY dates & Eurofins detail |
| 4 | Reviewed January 2020 | No changes made except FY dates & Eurofins detail |
| 5 | Reviewed January 2021 | No changes made except FY dates |
| 6 | Reviewed January 2022 | No changes made except FY dates |
| 7 | Reviewed January 2023 | No changes made except FY dates |
| 8 | Reviewed January 2025 | Additional point to section 6 and FY dates |
| 9 | Reviewed June 2025 | Changes made throughout the document |

1. Introduction

- 1.1. This statement sets out Eurofins UK Legal Entities' actions in the UK to understand all potential modern slavery risks related to its businesses and to put in place steps to prevent acts of modern slavery and human trafficking from occurring within its own business and its supply chains, and imposes the same high standards on its suppliers.
- 1.2. As part of Eurofins UK Legal Entities' involvement in the Bioanalytical Testing Market, the UK Legal Entities recognise that they have a responsibility to take a robust approach to slavery and human trafficking.
- 1.3. The Eurofins UK Legal Entities are absolutely committed to preventing slavery and human trafficking in their corporate activities and to ensuring that their supply chains are free from slavery and human trafficking.

2. Structure and Supply Chains

- 2.1. This statement covers the activities of Eurofins Forensic Services Limited:
 - 2.1.1. Eurofins Forensic Services Limited is a national forensic science business providing services to customers in the security sector, as well as to governments and academia. Eurofins Forensic Services Limited is headquartered in Wolverhampton with offices in England and employs in excess of 600 people.
 - 2.1.2. Eurofins Forensic Services Limited is part of the Eurofins Group, which is an international life sciences organisation which provides a unique range of analytical testing services through a global network of laboratories operating in over 51 countries. Each country operates with its own independent entities and management structure.
- 2.2. In order to serve our customer base and supply high-quality, accurate results, we work with a range of suppliers. The risk associated with modern slavery, including our wider supply chains, is low as a consequence of the highly 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 the EU. The majority of our employees are permanent, many of whom are graduates or have a doctorate. 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.

3. Policies

3.1. All Eurofins UK Legal Entities commit to developing and adopting a proactive and robust approach to tackling hidden labour exploitation and human trafficking.

3.2. Slavery and human trafficking are abhorrent crimes, and all of the Eurofins UK Legal Entities and employees have a responsibility to ensure this does not take place within our businesses. Eurofins UK Legal Entities 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.

3.3. As part of our commitment to combating modern slavery and human trafficking, we have implemented the following policies:

3.3.1. **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 details 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.

3.3.2. **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.

3.3.3. **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 workers' working conditions.

However, serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.

3.3.4. **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

3.4. We also make sure our suppliers are aware of our policies and adhere to the same high standards.

3.5. 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.

4. Responsibility

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

4.1.1. Our Managing Director is responsible for putting in place and reviewing policies, which are reviewed on an annual basis

4.1.2. 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 to their line manager

4.1.3. 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

4.1.4. 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

5. Risk Assessments

5.1. 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.

5.2. Our assessments are based on the perceived risk of modern slavery in the particular industry in

which the 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.

6. Due Diligence

6.1. 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:

- 6.1.1. 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 of our expectations, we endeavour to take steps to improve suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- 6.1.2. 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
- 6.1.3. Through the implementation of this programme, we ensure a responsible supply chain that shares our company values, ideas, practices and sustainable policies
- 6.1.4. Ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK
- 6.1.5. Our HR Department has measures in place to monitor the terms through which all Eurofins UK Legal Entities employees are engaged and remunerated. We minimise the use of agency and maximise our employment of permanent, salaried staff.
- 6.1.6. The specific nature of the work undertaken by Eurofins Forensic Services Limited requires vetting and clearance by Police or Government agencies; doing so reduces the likelihood of modern slavery within our operations.

7. Training and Support

- 7.1. We invest in educating our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our businesses. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy.
- 7.2. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

7.3. We require all staff within our organisation to complete training on modern slavery during induction, and at least annually as part of their ongoing CPD. Our modern slavery training is centred on GLAA's material and resources, and 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

8. Key Performance Indicators

8.1. Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- 8.1.1. requiring employees to have completed training on modern slavery (centred on the GLAA's resources, to better understand and respond to the identified slavery and human trafficking risks) as part of their induction and to undergo annual refresher training; and
- 8.1.2. refining our system for supply chain verification, whereby we evaluate the risk of potential suppliers before they enter the supply chain.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Eurofins Forensic Services Limited's slavery and human trafficking statement for the financial year commencing 1st January 2024 and ending 31st December 2024.

The Board approved this statement on 5 August 2025.

Signed: *Andrew Nelson*

Director

Eurofins Forensic Services Limited

Date: 5 August 2025