

BioMarker Solutions Group



Anti-Modern Day Slavery Policy

This statement sets out BioMarker Solutions Groups stance on understanding and implementing a policy that aims at identifying and dealing with all potential modern slavery risks that may be relevant to our business, whether it be within our business model or as part of our supply chain, or indeed in any shape or form with all or stakeholders. This policy abides by our code of conduct, code of ethics and all our risk management tools to identify, confront, resolve, and make transparent that our activities are clear, clean and precise. It is intended to give our workers, contractors, and all our business stakeholders guidance on slavery and human trafficking, indicating the measures that BioMarker Solutions Group takes to tackle it in all its business activities.

BMSG aims for itself and its stakeholders to be free from all forms of slavery:

- **Slavery:** Exercising powers of ownership over a person.
- **Servitude:** The obligation to provide services is imposed by the use of coercion.
- **Forced or compulsory labour:** Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- **Human trafficking:** Arranging or facilitating the travel of another person with a view to their exploitation.

Relevance

- Modern slavery is a complex and multi-faceted crime and tackling it requires many organisations and individuals to play a part. At first glance, individuals may think this subject is irrelevant to us, but it's not.
- At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- The Modern Slavery Act (MSA) 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.
- With this in mind, we need to pay particularly close attention to our supply chain, especially those areas which have historically proven to be at risk of such:
 - Short term hire of low skilled labour
 - Sourcing of raw materials from certain locations in the world
 - Outsourced activities such as cleaning, waste management, etc.

However, we must also be aware that there are additional facets of slavery and/or actions/activities that are also intertwined with slavery including but not limited to fraud, bribery, corruption, monopolisation, price fixing, etc. Each of our policies therefore needs to be understood, interpreted with a holistic understanding of each and every policy we set as we are committed to conduct business ethically and legally.

BMSG operations

Considering that the BMS Group is in fact a set of companies based in several countries with different legal infrastructures and social ethics; and that we partner, service and supply clients in even more countries; we are constantly surrounded by multiple and multiplex risks to our business model. Slavery (in all shapes, forms and manifestations) are likely to be present in and around our stakeholders. This policy and all our risk management actions are set in place to assist our employees to better identify, confront and subdue or overt such activities affecting our employees, the company and any of its stakeholders.

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs (non-exhaustive list) could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification, or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off/ collected from work.
- The person is withdrawn, or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

Remember, a person may display several trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it to senior management who will follow our reporting procedures.

Responsibilities and Risks

- The Company, our managers and our colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.
- Everyone must observe this Policy and be aware that 'turning a blind eye' is unacceptable and simply not an option.

BMSG

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- Be clear about our recruitment policy
- Examine our supply chains and be clear with key suppliers our expectations regarding the Act
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- Ensure we have in place an open and transparent grievance process for all staff
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare

- Make a clear statement that we take our responsibilities to our employees and our clients seriously

Managers

Managers will:

- Listen and be approachable to colleagues
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- Remain alert to indicators of slavery
- Raise the awareness and ensure all employees are provided a copy of this policy and be aware of their responsibilities
- Use their experience and professional judgement to gauge situations

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- Keep your eyes and ears open; if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- Tell us if you think there is more, we can do to prevent people from being exploited.

Risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- Certain areas of the supply chain have been identified as being at a higher risk
- Recruitment either through agencies or directly
- Unforeseen, masked items that might represent different unethical or illegal activities resulting in slavery or human trafficking.

BMSG Procedures

Anti-Slavery Statement

We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

Supply Chains

We inform all the companies we do business with, that we are not prepared to accept any form of exploitation. From the date of this policy, all relevant supplier contracts will contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

We apply reasonable due diligence to risk assessing our supply chain and use the following mechanisms to do this:

- Supplier mapping to identify key vulnerabilities
- Risk assessment
- Training and knowledge sharing for key Procurement through Due Diligence
- Ensuring all suppliers deemed "at risk" are fully supportive to the aims of this policy, (including asking for copies of their Anti Modern Slavery Statement and Policies)
- Harmonizing those processes which are already mutually inclusive of the aims of this policy into the due diligence.
- If any issues are identified, then this is escalated to senior management.

Recruitment Using Agencies

- Although the company does not use agencies, we impose a policy and declare that we would only use reputable recruitment agencies.
- We expect all recruitment agencies with whom we engage to fully comply with the Modern Anti-Slavery Act 2015;
- Are free from ethical ambiguities.
- Are transparent, accountable and auditable.
- If the Company has reason to believe that any recruitment agency has failed to meet these standards, management should be informed and any contracts with them could be terminated.

General Recruitment

- We always ensure all staff have a written contract of employment.
- We always ensure staff are legally able to work in the UK, or other nominative nation.
- We provide information to all new recruits on their statutory rights including sick pay, at least the legal minimum wage, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, senior management will be informed, and relevant procedures initiated.

Reporting Slavery

- Talking to someone about your concerns may stop someone else from being exploited or abused
- If you think that someone is in immediate danger, dial 999 (or appropriate emergency line).
- Otherwise, you should discuss your concerns with senior management who will decide a course of action which may include contacting the Police.
- Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with senior management before taking any further action.

Training

We ensure that all employees are made aware of this policy, and their obligation to comply with this policy. We encourage employees to discuss these topics, use training modules to understand the implications of the different facets of and the physical consequences of slavery and or human trafficking on the business, its shareholders and individuals.

Monitoring Our Procedures

We review our Anti-slavery policy regularly, at least annually as part of our QA audits and continuity of our ISO certification. We subsequently provide information and/or training on any changes made across our QMS.

Relevant policies:

Whistle-blower Policy: The company encourages all its employees, customers and other non-business and business stakeholders to report any concern related to our direct activities or any supply chain of the group. The Whistle-blower policy is designed to provide all employees and /or stakeholders the ability to report any violation of the company's code of conduct, and code of ethics without fear of retaliation.

Code of Conduct/Code of Ethics: The company's COC and COE are at the core of the business, through which all employees, managers, directors, contractors and even clients are expected to conduct themselves. BMSG activities are expected to be always conducted, and in all situations with the highest standards of integrity, ethics and legality.