

Modern Slavery Statement for FY ending 2021

As an ever growing business, The Binding Site (TBS) is committed to identifying and preventing modern slavery and human trafficking, not only in our own business but also within our supply chain. It is an issue which is (and will remain) a priority for us and we expect all of our employees, representatives, distributors and suppliers to share this commitment.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and provides an update on the actions we have taken (and are continuing to take) to guard against modern slavery and human trafficking in our business and its supply chain, for the financial year ending 30 September 2021.

OUR BUSINESS AND ITS STRUCTURE

Our global footprint is growing at a rapid pace, with more than 90% of our products being sold in countries outside the UK. We are a supplier of specialist, regulated medical diagnostic products which improve the diagnosis and management of blood cancers and immune system disorders. We continue to build on our strong scientific foundations, supporting research and development within our field and responding to the changing needs of patients, researchers and clinicians.

We operate internationally through our own subsidiaries and also via a network of distributors. We operate a zero-tolerance approach to modern slavery and human trafficking and this is made known to our network through our due diligence and contractual terms.

OUR SUPPLY CHAIN

TBS sources the majority of the goods and services required for the group (including raw materials and components) through a centralised UK purchasing team. The majority of our suppliers are based in Europe and the United States – both areas with a low prevalence of modern slavery and human trafficking.

Our production activities are within the UK and we distribute products and provide our services via our own subsidiaries and an international network of distributors.

OUR POLICIES AND PROCEDURES

Our Staff: All of our staff are required to comply with our **Code of Business Conduct**, which sets out the basis on which we operate as a group of companies. This document is published both internally and externally. Our overarching objective is to act with integrity and in an ethical manner in all of our business relationships.

Our Distributors: Our distributors are carefully chosen for their specialist skills and experience in their territory and they are vetted before their appointment to assess their working practices, including compliance with legislation on modern slavery and human trafficking. Our distribution contracts require our distributors to comply with legislation, with a right for us to audit performance of their commitments as required. We also have the right to require distributors to provide us (on a cyclical basis) with compliance statements, ensuring continued focus on issues such as modern slavery and human trafficking.

Our Suppliers: Our suppliers are asked to confirm what steps they are taking to prevent and address the risks of modern slavery and human trafficking in their business prior to their being onboarded as a supplier to our business. This forms part of our supplier due diligence questionnaire which has to be completed for each supplier before they can be used. We have a **Supplier Code of Conduct** which

helps us to manage our supplier relationships and ensure that they maintain standards similar to our own. This code includes a requirement to comply with all modern slavery and human trafficking requirements and to comply with the standards set by the International Labour Organisation. Our contracts require suppliers to comply with our policies and not to use exploited labour in their organisations and to pass that commitment down to their own suppliers; to comply with all applicable laws, including protective employment and labour laws; to comply with our (and all legal) health and safety requirements and we include within our contracts a right to be able to audit performance and compliance.

Our staff: We verify the right to work of each employee by inspecting original passports and visas to ensure that there are no potentially vulnerable employees. We will only use recruitment agencies and businesses for the supply of staff if they have first passed our due diligence procedures.

Reporting: We have a **Whistleblowing Policy** within TBS to allow staff to report any areas of non-compliance or concerns that they have. Any reports are taken very seriously, with investigations and action being undertaken by senior members of our business. In the coming financial year, our new external anonymous whistleblowing platform will be rolled out across the business.

GLOBAL SLAVERY INDEX

We undertake specific checks to identify any distributors and suppliers based in countries considered to be high risk on the Global Slavery Index. The onboarding and use of any supplier and/or distributor in a high-risk country must be approved at Board level before their appointment and before orders are placed.

THE DUE DILIGENCE PROCESS AND RISK ASSESSMENT

The board of directors of TBS is ultimately responsible for ensuring the effectiveness of, and TBS' compliance with, all policies, procedures and training requirements referenced in this statement. Together with the Board, the CFO and the Legal team reviews the modern slavery and human trafficking prevention measures on an ongoing basis to ensure continual improvement.

By way of example, in this next financial year we will implement a new Code of Business Conduct to further address some of the risks we have identified and to drive the right behaviours both within our business and within our suppliers and distributors.

TRAINING

We continue to train our staff through our Corporate Compliance programme, which includes modern slavery and human trafficking training and how to report it. As stated below, we are in the process of implementing a new online learning management system to allow us to further train staff on topics such as modern slavery and human trafficking, as well as other compliance matters.

LOOKING AHEAD

We are continuing to reinforce our commitment to proactively identifying and preventing modern slavery and human trafficking by:

- providing online training to staff on modern slavery and human trafficking, including the signs to look for, as well as whistleblowing; and
- supporting our whistleblowing policy by introducing a third-party system which allows truly anonymous reporting of issues – available to employees, and eventually customers and

suppliers. As a business, we have zero tolerance for discrimination against those who, in good faith, report serious misconduct; and

- as stated above, updating our Code of Business Conduct to emphasise our commitment to ethical conduct in the performance of our business activities.

BOARD APPROVAL

This statement has been approved by the Board of The Binding Site Group Limited

Mark Culwick

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Chief Finance Officer

Chief Legal Officer