

werfen

**POL17. Slavery and Human
Trafficking Policy**

Version Control

Versions			
Version	Date	Author	Modifications
00	July 2021	Joanne Bennicke	<p>Updated to New Corporate format & branding</p> <p>Move from Ver1.0 to Ver 00 when uploaded to SAP</p> <p>Annual Review: Section 2. Revenue updated to 1,695M€, workforce 5,501 & turnover £45M</p> <p>Section 4. New brand guidelines and removed IL, INOVA & BIOKIT to Werfen manufacturers.</p>

Document ownership and status

Document owner	Issuing department	IMS Process
Joanne Bennicke	HR	Non-Contractual Staff Handbook

Document status	APPROVED
<p><i>This is a controlled document. Whilst this document may be printed, the electronic version posted in SAP is the controlled copy. Any printed copies of this document are not controlled. As a controlled document, this document should not be saved onto local or network drives but should always be accessed from SAP.</i></p>	

Distribution list

Areas/Departments
Company

ISO standard section:

ISO Standard Clause	Description
7.1.4 (ISO 9001:2015)	Environment for the operation of processes
<p><i>This document has been prepared using the following ISO 27001:2013 standard controls as reference.</i></p>	
A.11	Physical and environmental security

©Werfen. All rights reserved. For internal use only.

Contents

Contents	3
1. Introduction from Richard Hames, General Manager	4
2. Organisation’s Structure.....	4
3. Our Business.....	5
4. Our Supply Chains	5
5. Our Policies on Slavery and Human Trafficking	5
6. Due Diligence Processes for Slavery and Human Trafficking	5
7. Supplier Adherence to Our Values and Ethics.....	5
8. Training.....	6
9. Our Effectiveness in Combating Slavery and Human Trafficking ...	6
10. Further Steps	6
11. Changes to this policy.....	6

1. Introduction from Richard Hames, General Manager

We are committed to continuously improving our practices to combat slavery and human trafficking.

Whilst we are proud of the steps we have taken thus far, it is vital that we remain alive to the need to be ever vigilant and that we constantly strive to improve our ability to recognise and defeat modern slavery and human trafficking .

We hope in this statement to set out a little about who we are, how we operate and our steps both present and planned to help fight this insidious and life-changing practice.

2. Organisation's Structure

We are a provider of sales and service of in-vitro diagnostic equipment to the UK healthcare sector.

We are part of the wider Werfen Group, and our ultimate parent company is Werfen, which is headquartered in Spain.

Werfen is a privately held corporation that was founded in 1966 in Barcelona.

Werfen is a worldwide leader in *in vitro* diagnostics in the specialties of Hemostasis, Acute Care Diagnostics and Autoimmunity.

Werfen operates directly in 30 countries and in more than 100 territories through distributors.

R&D and production centres are located in the United States and Europe.

In 2020, Werfen's group revenues were 1,696M€ and the Werfen group employed an average workforce of 5,501 people.

Our annual turnover for the financial year ending 31st December 2020 was in excess of £45M and we employed 87 staff in the UK.

3. Our Business

Our business is organised into 4 business units: Acute Care, Coagulation, Autoimmune and Service. We sell associated instrumentation and reagents into the healthcare sector and we provide service and product support to our customers.

4. Our Supply Chains

Our supply chains include: Werfen Manufacturers

5. Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We operate strictly to our values and Code of Ethics which can be found here:

<https://www.werfen.com/sites/default/files/code-of-ethics/index.html?new=1>

6. Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

7. Supplier Adherence to Our Values and Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we have in place a rigorous supply chain compliance programme. This consists of the Supplier Assessment Form that requests details of the potential supplier and their policies, including a check for a policy on Modern Slavery and we only source from low risk countries (UK, USA, Italy and Spain).

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Procurement.

8. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

9. Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Whistleblowing.** The number of reported breaches in the past year.
- **Training.** The number or percentage of staff trained.
- **Remedial action.** The instances of remedial action being needed.

10. Further Steps

We constantly review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our Company and its supply chains and those reviews and our KPI feedback inform the steps we intend to take going forward.

11. Changes to this policy

We reserve the right to change this policy at any time, where minor changes are made, which do not significantly affect this policy we will notify individuals about those changes by email.

On significant or fundamental changes to this document, individuals will be expected to review and agree to be bound by its conditions. If training is required, this will be performed and recorded within SAP Training module.

Once agreed individuals are subject to the new conditions of use from that date forward.

The policy will be freely available through SAP for employees to review.

This policy will be reviewed at least on an **annual** basis.

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 31st December 2020. It was approved by the board on 15th July 2021



**Werfen Limited
Date: 15th July 2021**