

**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 &amp; 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 &amp; turnover £45M Section 4. New brand guidelines and removed IL, INOVA &amp; BIOKIT to Werfen manufacturers.</p>
01	April 2023	Simon Rose	<p><b>Annual Review:</b> Section 2. Revenue updated to 1,854M€, workforce 5,643 &amp; turnover £50M, UK Staff number of 95</p>
02	Sept 2024	Joanne Bennicke	<p>ISO Standard updated to ISO 27001:2022 with clause A 5.16 &amp; A 6.1 added.</p> <p>Section 2- Revenue updated to 2,106 M€ &amp; workforce 7,095 people. Annual turnover for the financial year ending 31st December 2023 was in excess of £58M and we employed 132 staff in the UK.</p> <p>Reviewed and updated section 11. Changes to this policy to update the dates of financial year and date signed by Richard Hames.</p>
03	Jan 2025	Joanne Bennicke	<p><b>Annual Review:</b> <b>Section 2</b> - Revenue updated to €2,113M &amp; workforce 7500 people. Annual turnover for the financial year ending 31st December 2024 was in excess of £57M and we employed 127 staff in the UK.</p> <p><b>Section 3</b> – updated number of business units from 4 to 6 to include Transfusion &amp; Transplant and also added customer IT systems.</p> <p>Reviewed and updated <b>section 11</b>. Changes to this policy to update the dates of financial year and date signed by Richard Hames.</p>
04	Jan 2026	Joanne Bennicke	<p><b>Annual Review:</b> <b>Section 2</b> – Revenue updated to €2,200M &amp; global workforce 6890. Annual UK turnover (FY ending 31 December 2025): £65M; UK staff:130. Market leaders Transfusion &amp; Transplant added.</p> <p><b>Section 3</b> – Business unit structure reviewed. 7 business units as now separate units for Transfusion and Transplant.</p> <p><b>Section 5</b> - Code of Ethics link updated.</p> <p><b>Section 11</b> – Approval information updated to reflect 2026 cycle: 5<sup>th</sup> January 2026 along with signatory date 5<sup>th</sup> January 2026.</p>

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**Document ownership and status**

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

Document status	<b>APPROVED</b>
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**Distribution list**

Areas/Departments
Company

**ISO standard section:**

ISO Standard Clause	Description
<b>7.1.4 (ISO 9001:2015)</b>	<i>Environment for the operation of processes</i>
<p><i>This document has been prepared using the following ISO 27001:2022 standard controls as reference.</i></p>	
<b>A.7.1</b>	<i>Physical security perimeters</i>
<b>A.5.16</b>	<i>Identity management</i>
<b>A.6.1</b>	<i>Screening</i>

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## 1. Introduction from Richard Hames, General Manager

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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

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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 Haemostasis, Acute Care Diagnostics, Autoimmunity, Transfusion & Transplant.

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 2024, Werfen's group revenues were **€2,200M** and the Werfen group employed an average workforce of **6890** people.

Our annual turnover for the financial year ending 31<sup>st</sup> December 2025 was in excess of **£65M** and we employed **130** staff in the UK.

## 3. Our Business

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Our business is organised into 7 business units: Acute Care, Haemostasis, Autoimmune, Service, Transfusion, Transplant and Customer IT Systems. We sell associated instrumentation and reagents into the healthcare sector, and we provide service and product support to our customers including IT systems.

## 4. Our Supply Chains

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Our supply chains include: Werfen Manufacturers.

## 5. Our Policies on Slavery and Human Trafficking

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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/uk/en/code-of-ethics>

## 6. Due Diligence Processes for Slavery and Human Trafficking

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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

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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, Canada, Germany, 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

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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 31<sup>st</sup> December 2025. It was approved by the board on 5<sup>th</sup> January 2026**



**Werfen Limited**  
**Date: 5<sup>th</sup> January 2026**