

# Biotage Group Modern Slavery and Human Trafficking Statement

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## Introduction

This statement sets out Biotage's actions to understand all potential modern slavery risks related to its business and the steps it has put in place or is putting in place that aim at reducing the risk of slavery or human trafficking occurring within its own business and its supply chains. This statement relates to activities started in January of 2016 and that have been executed or are still ongoing.

Biotage recognizes that it has a responsibility to take a robust approach concerning modern slavery and human trafficking and is absolutely committed to preventing these issues from occurring either in our corporate activities, or in our supply chains.

## Organizational Structure and Supply Chains

Biotage offers efficient separation technologies from analysis to industrial scale and high quality solutions for analytical chemistry from research to commercial analysis laboratories. Biotage's products are used by government authorities, academic institutions, pharmaceutical and food companies, among others. The company is headquartered in Uppsala and has offices in the us, UK, China, Japan, South Korea and India. Biotage has approximately 500 employees and had sales of 1100 MSEK in 2019. Our Supply Chains source materials from a broad range of national and international suppliers.

The organization currently operates in the following locations:

- » Uppsala, Sweden (HQ)
- » Lund, Sweden
- » Charlotte, NC, USA
- » Salem, NH, USA
- » San Jose, CA, USA
- » Cardiff, UK
- » Seoul, South Korea
- » Tokyo, Japan
- » Osaka, Japan
- » Shanghai, China
- » New Delhi, India

## Process of Identification

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- » We assess all suppliers in terms of their location and industry, using the Global Risk Index and US State Department of Labor Industry Risk List as a guideline to identify potential risk areas within our supply chains.
- » We have a Supplier Performance Management System to monitor, improve and control supplier performance against our Supplier standards. This includes how our suppliers protect the human and employment rights of their employees. We routinely conduct supplier audits and undertake a proportionate risk assessment and due diligence investigation of all new suppliers before they are accepted as part of our procurement process. Before approval as a new supplier, all tier one vendors must complete a detailed self-assessment form which includes a questionnaire specific to the topic of modern slavery. Suppliers identified as medium to high-risk must pass an audit before approval.
- » Supplier violations of our Code of Conduct are dealt with on a case-by-case basis and in a manner commensurate with the nature and extent of the violation.

## High-risk Activities

The following Biotage purchase areas have been identified as being at potentially high risk of slavery or human trafficking and are currently under further investigation:

- » Glass components sourced in India
- » Machined castings sourced from China
- » Purchase of uniforms
- » Procurement of contract cleaning services
- » Purchase of electronic components

### Responsibility for the Organization's Anti-slavery Initiatives

- » The Board of Directors and CEO have executive accountability for the management and continued application of the Modern slavery and human trafficking statement. Collectively, it is the responsibility of all Biotage employees to ensure that the requirements of this statement are adhered to.
- » Procurement Managers are required to complete training on the Modern slavery and human trafficking statement, have the ability to identify indicators of it, and to ensure and monitor compliance of policies and

procedures during the sourcing process as well as ensuring the use of appropriate contract clauses, KPIs and reporting frameworks.

- » Procurement administrators are required to complete training on the Modern slavery and human trafficking statement, understand the process for reporting any indicators of it and be able to direct internal and external contacts to where the policies are communicated.

## **Relevant Policies**

Biotage operates the following policies that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

### **Whistleblowing Policy**

Biotage encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Biotage. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organization's 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 complete our confidential disclosure form, available on our website.

### **Code of Conduct**

Biotage's code makes clear to employees the actions and behaviour expected of them when representing the organization. Biotage strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and when managing its supply chain. Biotage is committed to ensuring that its suppliers adhere to the highest standards of ethics, and our expectations of suppliers to meet our requirements is integrated into supplier contracts and approval processes. 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 organization is developing a preferred list and intends to work with suppliers to ensure that they meet the standards of the code.

### **Recruitment Policy**

Biotage uses only specified, reputable employment agencies to source labour.

## **Due Diligence**

Biotage undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Biotage's Procurement function carries out the following actions:

- » mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- » reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- » conducting supplier audits or assessments through the organization's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- » creating an annual risk profile for each supplier;
- » invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## **Effectivity/Performance Indicators**

The organization has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organization is:

- » requiring all staff working in Supply Chain/HR to have completed training on modern slavery, for new employees this should be done during the induction period.
- » aiming to improve on its existing system for supply chain verification, whereby the organization evaluates potential suppliers before they enter the supply chain;
- » reviewing its first tier suppliers in its existing supply chains by 2017, adding on new first tier suppliers as they become part of its supply chain, with second and third tier suppliers following in 2018 and added as they are incorporated in the supply chain; and
- » carrying out audits on all high risk areas identified during recurring mapping.

## **Training**

The organization requires all relevant staff within the organization to complete training on modern slavery, to cover the following areas:

- » our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- » how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- » how to identify the signs of slavery and human trafficking;

- » what initial steps should be taken if slavery or human trafficking is suspected;
- » how to escalate potential slavery or human trafficking issues to the relevant parties within the organization;
- » what external help is available, for example through the Modern Slavery Helpline, Gang masters Licensing Authority and "Stronger together" initiative;
- » what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- » what steps the organization should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organization's supply chains.

### **Awareness-raising Program**

As well as training staff, the organization has raised awareness of modern slavery issues by informing the staff through various channels, for example placing posters around the sites and circulating a series of emails to staff.

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