

BIOCAIR MODERN SLAVERY STATEMENT 2023



MOVING **SCIENCE** FORWARD



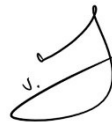
FOREWORD

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Biocair International Limited (known as Biocair) during the year ending 31st December 2023 to prevent modern slavery and human trafficking in its business and supply chain.

This statement is intended:

- to evidence the progress Biocair has made since its 2022 Modern Slavery Statement.
- to demonstrate that Biocair understands the risks of modern slavery and human trafficking are not static and that it recognises the need to review continually and update its approach.
- to show that Biocair remains committed to enhancing its capacity to identify, prevent and mitigate any actual or potential risks.

This statement has been approved by the Biocair Board of Directors and is signed on its behalf by Vincent Howard, Chief Executive Officer, Biocair International Ltd on 28 February 2024.



BIOCAIR'S MODERN SLAVERY STATEMENT

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Biocair has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in its supply chains.

Biocair is equally committed to ensuring that it does not deal with suppliers or partner with organisations who engage in modern slavery or human trafficking.

This statement focuses on the actions Biocair has taken to identify and prevent Modern Slavery in its supply chains. However, Biocair also recognises that poor labour practices, exploitation, and human rights abuses within supply chains can often be indicators of a lack of robust management systems which would prevent modern slavery occurring.



BIOCAIR'S MODERN SLAVERY COMMITMENT

Biocair will make an annual Modern Slavery statement in accordance with the UK Modern Slavery Act 2015 requirements, which will show the steps it has taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains.

It will be published on the Biocair corporate website at the end of each financial year.

Biocair expects to build on its statement each year and therefore show that progress is being made.

The statement will show:

- the organisation structure, business, and supply chains.
- the policy in relation to slavery and human trafficking.
- the due diligence processes in relation to slavery and human trafficking.
- the parts of the business and supply chains where there is a risk of slavery and human trafficking, and what steps are being taken to assess and manage that risk.
- the training available to employees about slavery and human trafficking.



The statement will be approved by the Biocair Board of Directors and signed by a designated Director.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS



STRUCTURE

Founded in 1986 in Cambridge, UK as a specialist logistics provider to the pharmaceutical, biotechnology and life sciences sectors, since 2002 Biocair has become a truly global company, establishing offices in the US, Asia, Europe, and Africa.

In 2012 Biocair was acquired by GeoPost SA, owners of the DPDGroup, the largest parcel delivery network in Europe, and part of Le Groupe La Poste. This has enabled Biocair to benefit from enhanced supplier relationships and access to advanced technologies, networks, and routes across the globe, enabling our logistics experts to implement industry-leading supply chain solutions for the life sciences sector.



For the purpose of this statement, Biocair refers to Biocair Inc (US) and Biocair International Ltd (UK) and its subsidiaries Biocair France SAS, Biocair Belgium N.V, Biocair International Forwarding (Shanghai) Co Ltd, Biocair Singapore Pte Ltd, Biocair Germany GmbH, Biocair India Private Ltd, Biocair South Africa (Pty) Ltd, Biocair Australia (Pty) Ltd.

BUSINESS

Biocair is a global GDP logistics specialist with nearly 40 years of experience in the pharmaceutical, biotechnology and life sciences sectors. The company has built a unique, client-centric approach by employing scientists in front-line logistics positions and assembling a team of best-in-class industry experts in quality, cold chain, and regulatory compliance. Biocair focuses on providing the most comprehensive time-sensitive and temperature-controlled logistics services available whilst delivering flexible, tailored, cost effective solutions to all clients. The Biocair network operates 24/7 in over 160 countries across Europe, Africa, Asia, and the Americas.

GOVERNANCE

The Board of Directors comprises:

- Chris Cooke (CEO) – Biocair (until 22/12/2023)
- Vincent Howard (COO) – Biocair
- Cédric Favre-Lorraine – GeoPost (until 30/11/2022)
- Benjamin Demogé – GeoPost
- Gwenael Clement – GeoPost (from 01/12/2022)

Governance of human rights is delegated to the Strategic Leadership Team (SLT) which reports to the Biocair Board. The Strategic Leadership Team comprises:

- Chris Cooke – Chief Executive Officer (until 22/12/2023)
- Vincent Howard – Chief Operating Officer
- Alan Brooks – Chief Finance Officer
- Michelle Watson – Chief People Officer
- Christopher Good – Director of Cell and Gene Therapy Logistics
- Manish Joshi – Corporate Development Director
- Emma Turner – Chief Information Officer (since 04/07/2023)

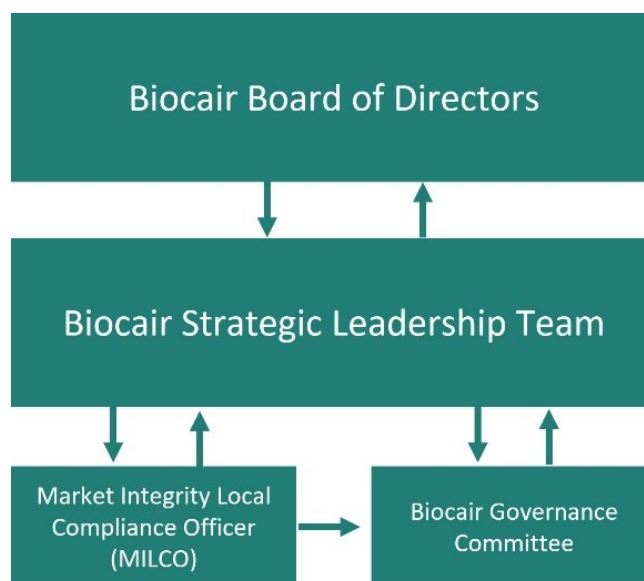
Day-to-day responsibility for overseeing Biocair's ethical compliance, including Modern Slavery, sits with the Global Head of ESG and Risk, who reports directly to the Chief People Officer in her capacity as Chief Compliance Officer (CCO), and who also has direct access to the CEO.



The Biocair Governance Committee met six times through 2023 and continued to provide assurance to the Strategic Leadership Team and the Board that Biocair's risk management strategies and governance arrangements are effective and appropriate to meeting governance and risk requirements of GeoPost/DPDgroup. The scope of the Committee includes Modern Slavery.

In 2023, Biocair established a Risk Committee which meets quarterly and comprises the members of the Strategic Leadership Team and the Global Head of ESG and Risk.

The Duty of Care risk assessment, which includes human rights risks, is included in the enterprise-level risk register overseen by the committee. The Duty of Care risk assessment is due for renewal in 2024.



SUPPLY CHAINS

Biocair categorizes suppliers and contractors into two groups:

- **Operational Logistics suppliers / contractors** - comprising airlines, couriers, agents, customs brokers, packaging houses, transport providers and specialist storage providers.

These suppliers are centrally selected and managed and, apart from airlines, they all are required to complete the Supplier Code of Conduct Declaration which includes a section on modern slavery, human trafficking, and general labour standards.

- **Non-logistics suppliers/contractors** - comprising HR and recruitment service providers, buildings and office maintenance, cleaning, and security service providers, business consumables suppliers, and suppliers of professional services such as lawyers, accountants, marketing, and other advisers. Most of these suppliers and contractors are locally



selected and are required to complete the **Supplier Code of Conduct Declaration** unless sole traders.

Last year's statement recognised that due diligence follow-up with suppliers and contractors across both categories could be strengthened. The planned **Procurement and Responsible Business** review has started with a full review of the supplier onboarding process and related policies and operating procedures, with the aim of simplifying the processes and strengthening the requirements.

SUPPLIER DUE DILIGENCE PROCESS IN RELATION TO MODERN SLAVERY & HUMAN TRAFFICKING



Prior to onboarding, all new goods and service suppliers (including subcontractors) are required to answer a series of questions in order to evaluate their compliance standards across health and safety, environmental impact, human rights (including modern slavery), and business ethics, all contained within the **Supplier Code of Conduct Declaration**.

Where standards are deemed to be insufficient and there is a business case for onboarding the supplier, the supplier is subject to further review, in consultation with the appropriate Biocair subject matter expert.

In addition to the **Biocair Supplier Ethical Code of Conduct**, introduced in 2022, Biocair launched the **Sustainable Procurement Charter** in 2023, which requires suppliers to confirm their acceptance and conformance through a signed declaration. This will be rolled out to all existing suppliers through 2024, and to new suppliers immediately. This will replace the **Supplier Code of Conduct Declaration**.

Any suppliers who do not meet the requirements of the **Biocair Supplier Ethical Code of Conduct** and the **Sustainable Procurement Charter** will not be approved for trading with Biocair.

In 2023, for the second year, Biocair achieved the EcoVadis Silver Medal rating. Biocair had planned to start using EcoVadis to assess labour and human rights practices of key suppliers, determined on a risk-based approach. However, due to other internal priorities, this had to be postponed and is due to start happening in 2024.

To monitor, review and manage supplier commercial and general compliance performance Biocair uses the following:

- Supplier Audit Procedure
- Supplier Audit Questionnaire
- Supplier Code of Conduct Declaration (replaced by the **Sustainable Procurement Charter**)
- Supplier Contracts
- Supplier Evaluation and Approval Procedure
- Supplier Continuous Improvement Procedure
- Supplier Monitoring, Evaluation and Review Procedure



Ethical compliance monitoring does not feature significantly in these procedures beyond initial supplier / contractor on-boarding checks. This is being addressed as part of the **Procurement and Responsible Business** review in 2024.

POLICY & PROCEDURES

Biocair has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in its supply chains.

Through its parent company, GeoPost SA, Biocair is signatory to the United Nations Global Compact, demonstrating its commitment to respect and promote the principles of human rights, international labour standards, the environment, and the fight against corruption, in its activities and in its sphere of influence. These principles are included in the following:

- The **Biocair Human Rights Standard**, which includes Biocair's **Human Rights and Modern Slavery Statements** as well as Biocair's **Modern Slavery Commitment**, guidance on how to identify modern slavery and exploitation, and procedures for reporting.
- The **Biocair Supplier Ethical Code of Conduct**, which references various international human rights and labour standards and highlights Biocair's support for them in its internal processes and procedures and its expectation that suppliers do likewise. In addition, the Standard covers Biocair's expectations in regard to Human Rights and Fair Labour Practices, Freedom of Association, Child Labour, Bonded and Trafficked Labour, and Wages.
- The **Biocair Procurement Policy**, which requires all suppliers to observe the highest standard of transparency and integrity during the corporate procurement process, the execution and implementation of its contracts, in accordance with Biocair's **Supplier Ethical Code of Conduct**.
- The **Biocair Sustainable Procurement Charter** confirms that, in all circumstances, Biocair applies international principles applicable to labour and human rights as defined by the International Bill of Human Rights, the OECD Guidelines, the fundamental Conventions of the International Labour Organization, the United Nations Guiding Principles and the Sustainable Development Goals. In addition, it sets out the behaviours expected from Biocair suppliers in support of this commitment.
- The **Biocair Responsible Business Standard**, which was introduced in 2023, outlines Biocair's approach to conducting its business in a responsible manner and to establish a reference framework from which Biocair can develop and strengthen socially responsible behaviours in all the territories where it operates, locally adapting actions as necessary.



Additionally, the Standard highlights Biocair's expectations of its suppliers in addressing worker exploitation, forced labour, harassment, intimidation, human trafficking and the exploitation of children, young people or women.

- Biocair has also introduced the **Biocair Whistleblowing Standard** and a confidential whistleblowing reporting mechanism available to all employees for reporting concerns or suspicions of wrongdoing, including modern slavery or human trafficking. The Standard also explains what steps Biocair will take to protect employees who report concerns in relation to modern slavery or human trafficking.

In last year's statement, Biocair committed to making this facility available to all third parties by the end of December 2022. Unfortunately, due to unforeseen circumstances, this was not possible and had to be postponed. This will happen by the end of Q1 2024.

- The Biocair **Employee Assistance Programme (EAP)** now provides a confidential telephone support service where advice and information can be sought by employees across a wide range of topics, including suspicions about modern slavery and human trafficking.

PARTS OF THE SUPPLY CHAIN WHERE THERE IS A RISK OF MODERN SLAVERY AND HUMAN TRAFFICKING

Biocair's global network operates in over 160 countries to provide customers with fully GDP compliant life sciences supply chain management solutions.

Biocair works with logistics subcontractors in 129 countries and based on the data from the Global Slavery Index 2023¹ we have assessed the likelihood of modern slavery within these operations.

Region	Number of countries with Biocair sub-contractors	Ave estimated prevalence of modern slavery
Africa	34	5.3 per 1000 people
Americas	24	5.7 per 1000 people
Arab States	10	9.9 per 1000 people
APAC	23	9.1 per 1000 people
Central Asia	3	9.1 per 1000 people
Europe	35	5.2 per 1000 people

Using this assessment, Biocair will prioritize sub-contractors in the three highest risk regions: Central Asia, APAC and the Arab States for increased due diligence checks in relation to modern slavery and human rights.

¹ Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation, Available from: <https://www.walkfree.org/global-slavery-index/downloads/>

EMPLOYEES AND OTHER INDIVIDUALS WITH WHOM WE DEAL (TEMPS/ CONTRACT LABOUR)

In 2023, Biocair employees were based in Belgium, China, France, Germany, India, the Netherlands, Singapore, South Africa, the United Kingdom, and the United States.

In terms of labour used, globally Biocair employs approximately 531 individuals, the majority (91%) employed on permanent contracts of employment, all of which are compliant with the relevant local legislation. 40 individuals are employed on fixed-term contracts. Wages are paid electronically directly to the employee's bank account.

Within the UK, Biocair does not onboard a new employee until the individual has provided the correct Right to Work evidence, in line with Home Office guidance. Equally, Biocair is fully compliant with the legislative requirements of both the National Minimum Wage and the National Living Wage.



STEPS TAKEN TO ASSESS AND MANAGE THE RISK OF SLAVERY AND HUMAN TRAFFICKING IN THE SUPPLY CHAINS

RISK ASSESSMENT

In May 2022, Biocair conducted a Duty of Care Risk Assessment of its own operations (Tier 0) and sub-contracted delivery services (Tier 1), focusing on the following issues:

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| <ul style="list-style-type: none">• Forced labour.• Child labour• Non respect of international labour standards on migrant workers• Excessive use of precarious employment contracts• Equal opportunities discrimination | <ul style="list-style-type: none">• Harassment and abuse• Freedom of association• Excessive working hours• Unfair wages• Inadequate social benefits/social security• Inadequate working environment• Occupational Health & Safety |
|--|---|

Within Tier 0, while Biocair identified many of the risks could possibly occur, given the well-developed mitigating policies and procedures, it was judged that the net risk vulnerability score across these risks is 2/10.

Nevertheless, Biocair will continue to monitor and review the efficacy of its procedures, specifically in relation to policy implementation in the areas of equal opportunities and discrimination (3.4/10) and occupational health & safety (2.6/10)

Within Tier 1, while again Biocair judged that many of the risks could possibly occur, the business feels less assured of sub-contractors' mitigating policies and procedures and therefore it judges the net risk vulnerability score across these risks is 6/10.

Biocair considers the main risk to its business in terms of potential exposure to slavery and human trafficking lies in the use of sub-contracted delivery services in high-risk countries. This is included in the **Procurement and Responsible Business review** already mentioned.

The Duty of Care Risk Assessment is due to be updated in 2024.

MEASURING EFFECTIVENESS (KPIs)

Biocair understands that the risks of modern slavery and human trafficking are not static and to assess the effectiveness of the measures taken, Biocair is reporting on the following key performance indicators:

Staff training	US – 144 employees completed equal to 36 training hours. UK – 146 employees completed equal to 36.5 training hours
Actions taken to strengthen supply chain auditing and verification	Launch of Sustainable Procurement Charter Procurement and Responsible Business review
Steps taken to assess high risk suppliers' awareness and their ability to detect and mitigate supply chain risks	NIL
Investigations undertaken into reports of modern slavery and human trafficking and actions taken	NIL

TRAINING AND AWARENESS

TRAINING

Biocair launched a Modern Slavery Awareness eLearning module in July 2022 to the 204 UK-based employees, including all members of the Strategic Leadership Team (SLT). The module provided an overview of modern slavery risks, modern slavery presence and statistics, and guidance on how to spot the signs and report concerns safely.

In January 2023, Biocair launched a Modern Slavery Awareness eLearning module to the 185 US-based employees. As with the UK version, the module provided an overview of modern slavery risks and guidance on how to spot the signs and report concerns safely, all within the US context (both social and legal)

Refresher eLearning for the UK and US and additional territory-specific eLearning will be launched in March 2024.

TOOLKIT

To support the Modern Slavery Awareness e-Learning module, the MILCO (Market Integrity Local Compliance Officer) developed a Modern Slavery and Human Trafficking toolkit, which was made available to employees via the Biocair Intranet. The kit contains:

- a poster for communal areas on spotting the signs of slavery and human trafficking.
- a poster for private areas on how to seek support or report suspected trafficking (Whistleblowing)
- A TV scrolling slide for sites that have this facility.
- a video presentation explaining the issues and offering guidance on how to spot the signs and report concerns.

THIRD PARTIES

Biocair has not engaged with external third parties (suppliers) on modern slavery and human trafficking but recognizes that as part of the **Procurement and Responsible Business** review and the rollout of the Whistleblowing online platform to external third parties, there will be opportunities and a requirement to engage and support suppliers.



OUR GLOBAL REACH

Biocair provides global services by establishing itself in key locations across 160 countries with Centers of Excellence in Europe, North America, Asia and Africa.

Each center is supported by carefully selected and managed service partners. Biocair's service partners are extensively practiced and subject to periodic audits, consistently ensuring the highest quality supply chain.

