




MOVING **SCIENCE** FORWARD

MODERN SLAVERY STATEMENT 2022





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 30th September 2022 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 2021 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 Chris Cooke, Chief Executive Officer, Biocair International Ltd on 30th September 2022.



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

Biocair was 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 Limited and its subsidiaries Biocair France SAS, Biocair Asia Limited, 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, and Biocair Australia (Pty) Ltd.

BUSINESS

Biocair is a global GDP logistics specialist with over 35 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 |
| Vincent Howard (COO) | Biocair |
| Cédric Favre-Lorraine | GeoPost |
| Benjamin Demogé | GeoPost |

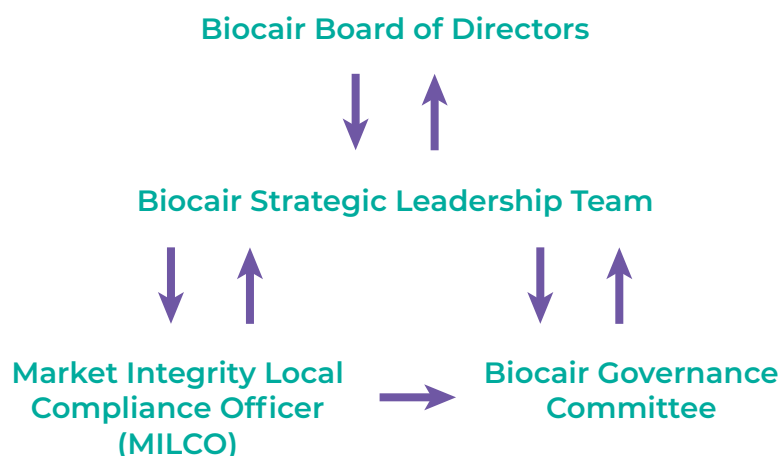
Governance of human rights is delegated to the Strategic Leadership Team (SLT) which reports to the Biocair Board. The Strategic Leadership Team comprises:

| | |
|------------------|---|
| Chris Cooke | Chief Executive Officer |
| Vincent Howard | Chief Operating Officer |
| Bruce Kennedy | Chief Commercial Officer (until 29/04/2022) |
| Jeremy Thomas | Chief Finance Officer (until 31/03/2022) |
| Alan Brooks | Chief Finance Officer (since 31/05/2022) |
| Michelle Watson | Chief People Officer |
| Christopher Good | Director of Cell and Gene Therapy Logistics |
| Manish Joshi | Corporate Development Director |

Day-to-day responsibility for overseeing Biocair's ethical compliance, including Modern Slavery, sits with the Head of Sustainability, who reports to the Chief People Officer in their capacity as Chief Compliance Officer (CCO).

In 2021, Biocair established the Biocair Governance Committee chaired by the CEO and comprising the Chief People Officer (as CCO), the Chief Finance Officer, the Chief Information Officer, the Global Quality and Compliance Manager and the Head of Sustainability (in the role of MILCO).

The purpose of the Governance Committee is to ensure and 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.





SUPPLY CHAINS

Biocair categorises 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.

Biocair recognises that due diligence follow-up with suppliers and contractors across both categories is not as robust as it could be. Following the outputs of the recent Duty of Care Risk Assessment carried out in May 2022 and further updated in September 2022, Biocair is in process of developing a plan to address this as part of a wider Procurement and Responsible Business strategy.

Biocair's supply chain explained.

We work with:

- 306 agents in 55 countries, who provide services such as customs brokerage, logistics transport, and packing shipments.
- 96 couriers in 13 countries, and included in this number are both integrators and domestic couriers
- 16 Customs Brokers who provide customs brokerage services only in 7 countries.
- 61 packaging suppliers in 9 countries who provide everything from packaging, coolant, and temperature monitors
- 13 non-logistics transport suppliers in 4 countries not involved in 'live' shipments
- 609 non-logistics suppliers in 15 countries who supply everything from energy, storage, and cleaning to IT and Finance services and consultancy.

Supplier Due Diligence Process in Relation to Modern Slavery and 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.

From 2021, with the launch of the Biocair Supplier Ethical Code of Conduct, suppliers are required to sign it as part of the standard Terms and Conditions to demonstrate their commitment to operating according to Biocair's vision and values.

Any suppliers who do not meet the requirements of the UK Modern Slavery Act or the Biocair Supplier Ethical Code of Conduct in relation to forced /compulsory labour are not allowed to trade with Biocair.

In 2022, Biocair achieved an EcoVadis Silver Medal rating and in 2023 will start to use EcoVadis to assess labour and human rights practices of key suppliers, determined on a risk-based approach.

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
- 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 will be addressed as part of a supplier management review in 2023.



Policy and 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.

In support of this commitment, in 2021 Biocair had the following suite of policies and procedures in place which include modern slavery and human trafficking requirements:

Corporate Social Responsibility Policy – replaced in part by the
Biocair Human Rights Standard

- Corporate Compliance Manual – currently under review
- Supplier Code of Conduct Declaration – currently under review
- Supplier Audit Procedure
- Supplier Management Manual
- Supplier Selection Scoring Matrix
- Supplier Contracts

In last year's Modern Slavery Statement Biocair identified the need to review these policies and procedures to increase robustness and to close any identified gaps, and to that end in 2022, the following were introduced:



- The **Biocair Employee Code of Conduct** sets out Biocair's minimum expectations for all those who work with Biocair: employees, agency staff and consultants. The Code provides a framework that ensures we all do the right thing and act responsibly, including respecting human rights.
- The **Biocair Human Rights Standard** 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** 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** 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 Whistleblowing Standard** and a confidential whistleblowing phone line and online platform available to all employees and agency staff for reporting concerns or suspicions of wrongdoing, including modern slavery or human trafficking. The Standard also explains what steps Biocair will take to protect anyone reporting concerns in relation to modern slavery or human trafficking. This facility will be made available to all third parties (suppliers and consultants) by the end of 2022.
- 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.



Steps Taken to Assess and Manage the Risk of Slavery and Human Trafficking

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) focussing on the following issues:

- Forced labour
- Child labour
- Non respect of international labour standards on migrant workers
- Excessive use of precarious employment contracts
- Equal opportunities and discrimination
- Freedom of association
- Excessive working hours
- Unfair wages
- Inadequate social benefits / social security
- Inadequate working environment
- Occupational Health & Safety
- Harassment and abuse

Within Tier 0, while Biocair identified many of the risks could possibly occur, however given the well-developed mitigating policies and procedures, it was judged that the net risk vulnerability score across these risks is minor. Nevertheless, Biocair will continue to monitor and review the efficacy of its procedures, specifically in relation to policy implementation in the areas of working hours and occupational health & safety.

Within Tier 1, Biocair believes the risks are more likely to occur among sub-contractors, especially in areas of high risk such as Africa, China, and India. Biocair feels less assured of sub-contractors' mitigating policies and procedures and so it judges the net risk vulnerability score across these risks is moderate.

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 and therefore, it will build this into the **Procurement and Responsible Business** strategy work already mentioned.



MEASURING EFFECTIVENESS (KPIs)

Biocair understands that the risks of modern slavery and human trafficking are not static and in order to assess the effectiveness of the measures taken, it proposes to review the following key performance indicators and start reporting on them from the 2023 Modern Slavery Statement:

- overall number of high-risk suppliers based on risk management framework
- proportion of high-risk suppliers who have been assessed as having appropriate policies and procedures in place with respect to modern slavery.
- staff training levels.
- actions taken to strengthen supply chain auditing and verification.
- details of any investigations undertaken into reports of modern slavery and human trafficking and the actions taken in response





Training and Awareness

Biocair recognises that appropriate and targeted training is essential. In March 2022, Biocair ran the first mandatory training on the **Biocair Employee Code of Conduct**. 95% of Biocair employees completed the training across all our geographies.

Biocair also provided 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 is designed to provide an overview of modern slavery risks, modern slavery presence and statistics, and guidance on how to spot the signs and report concerns safely.

This is the first time Biocair has launched such training, and based on feedback, Biocair plans to develop territory-specific modules for other Biocair employees in 2023.

In addition, Modern Slavery Awareness will be included in a new employee induction process due to be launched in 2023.

TOOLKIT

To support the Modern Slavery Awareness e-Learning module, Biocair developed a Modern Slavery and Human Trafficking toolkit, which is made available 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 recognises that as part of the Procurement and Responsible Business strategy work and the rollout of the Whistleblowing online platform to external third parties, there will be opportunities and a requirement to engage and support suppliers. Biocair expects to provide an update on progress in the 2023 Statement.

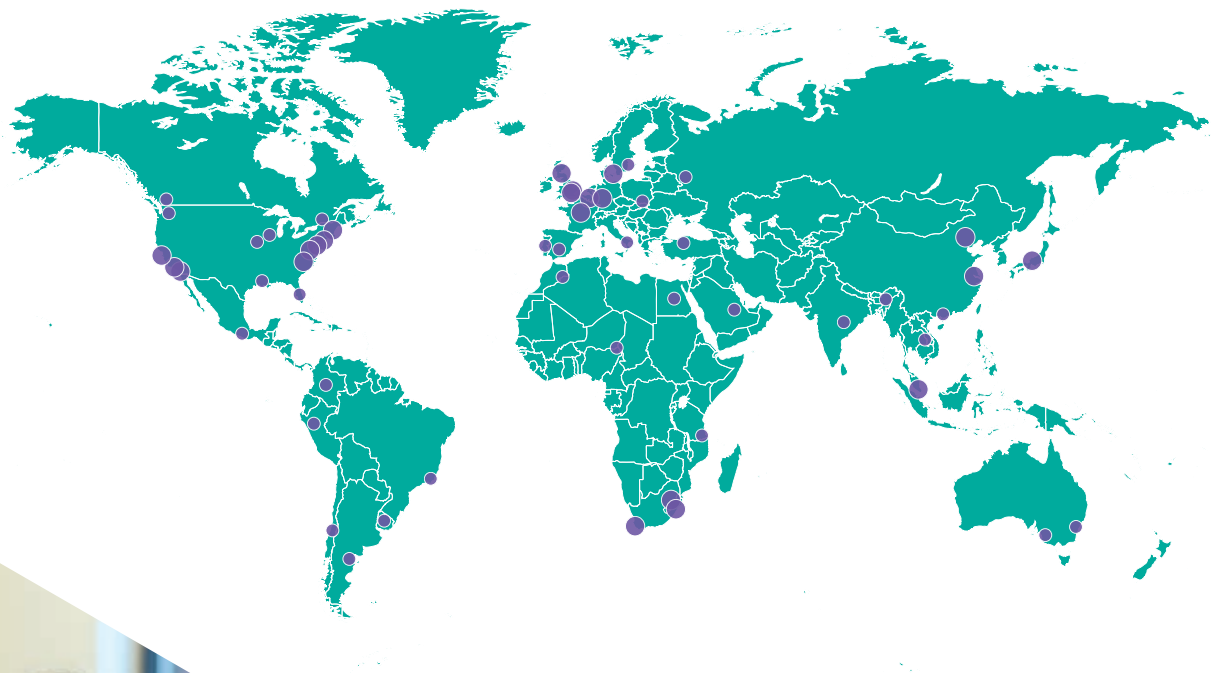




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About **Biocair**

Since 1987 Biocair has built up 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 amongst others. Biocair focuses on providing the most comprehensive service options available whilst delivering flexible, tailored, cost effective logistics solutions to all clients.



For a full list of global offices,
visit **www.biocair.com**

Contact your local Biocair
representative to discuss
how we can support your
bioscience logistics



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