

The Binding Site Group – Modern Slavery Statement

The Binding Site (TBS) is committed to combating the real and growing problem of modern slavery and trafficking, which can affect all industries. We recognise our responsibility to be alert to the risks in our business and supply chain at all levels. We expect our employees, partners, distributors and suppliers to share our commitment to ensure we proactively prevent modern slavery and human trafficking wherever possible.

This statement is made pursuant to Section 54 of The Modern Slavery Act 2015 and provides an update on the actions we have taken to guard against modern slavery and human trafficking in our business and supply chain, for the financial year ended 30 September 2020.

1. Our structure, business and supply chains

Our business and structure

With more than 90% of our products sold overseas, TBS is an international supplier of specialist, regulated, medical diagnostic products which improve the diagnosis and management of blood cancers and immune system disorders.

Founded by researchers at the University of Birmingham, TBS has continued to build on its strong scientific foundations, supporting research and development within our field and responding to the changing needs of patients, researchers and clinicians for over 30 years.

Our global coverage ensures we are able to distribute products through our network of subsidiary offices and distributor partnerships, meeting our customers' needs wherever they are.

TBS is committed to improving practices and driving out acts of modern day slavery and human trafficking. Embedded in our purchasing principles and communications with our supplier base is a zero-tolerance approach to modern slavery and human trafficking.

Our supply chain

We recognise that suppliers are an important part of our success and we want to work with suppliers who share our values and support us in delivering our purpose. We are committed to working with our supply chain to ensure that together we can achieve wider social, economic and environmental benefits.

At TBS we source the majority of our goods and services, including the raw materials and components for our products, through a centralised UK-based purchasing team. The majority of our goods and services suppliers are based in Europe and the USA, both regions with a low prevalence of modern slavery as defined by the Global Slavery Index.

Our production activities take place in both the USA and at our UK head office, and we supply our products via our subsidiaries and through our worldwide network of distributors.

2. Our Policies

TBSG has a number of policies and codes that are relevant to tackling modern slavery and trafficking with respect to its business and suppliers:

- Our **Code of Business Conduct** 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 chain. Every employee of TBS and its group companies must adhere to the Code of Business Conduct which is published internally and shared externally.
- Our **Whistleblowing Policy** has been implemented for reporting serious misconduct at TBS. We have updated the Policy this year to be in line with the EU Whistleblower Protection Directive that will come into force in 2021. As described in more detail in the Policy, TBS has zero tolerance for discrimination against employees who, in good faith, report serious misconduct through the whistleblowing system.
- Our **Supplier Code of Conduct** has been specifically created to help us manage our relationships with suppliers and to ensure that they maintain similar standards to ours. The Code includes provisions regarding modern slavery and human trafficking and in relation to child labour. Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers' and their sub-contractors' places of production. We require all of our suppliers to adhere to the standards set out by the International Labour Organisation.

3. The Due Diligence Process and Assessing the Risk

The TBS Board is ultimately responsible for ensuring the effectiveness of and TBS' compliance with all policies, procedures and training requirements set out in this statement. Together with the Board, the CFO reviews the human trafficking and modern slavery prevention steps put into place once a year to ensure our continual improvement and commitment in this key area of our Code of Business Conduct.

Through our contracting process with our suppliers, distributors and customers we promote compliance with the Modern Slavery Act both in form and spirit.

Suppliers

We continuously review and seek to mitigate risks in relation to suppliers who operate in areas where there may be modern slavery risks in the supply chain.

Prior to trading, all new suppliers to the UK business must commit in writing to the principles enshrined in our Code of Business Conduct to ensure that we only trade with suppliers whose values are aligned to our own. Standard contractual provisions we look to incorporate into our supply contracts include:

- Obliging suppliers to comply with our policies and not to use exploited labour in their organisation and to pass that obligation onto their sub-suppliers
- Requiring that they comply with protective local labour laws
- Requiring that they comply with applicable Health & Safety requirements
- Providing TBS with a right to audit compliance

Our key suppliers (categorised according to criticality, risk and value) undergo regular quality audits (which may include physical inspections). These processes are documented and are designed to assist in identifying suppliers whose compliance has altered since their initial onboarding.

Distributors

We have a robust due diligence process for appointing overseas distributors and a compliance statement is required on a cyclical basis from all distributors, ensuring continued focus on identifying risk in relation to modern slavery. In working closely with suppliers and distributors we are progressively reducing exposure to modern slavery within our supply chain.

Global Slavery Index

Specific checks are in place to identify any distributors and suppliers based in countries considered to be high risk on the Global Slavery Index. Since 2017 any new supplier or distributor based in or controlled from a high-risk country must be approved at Board level before they are appointed and any orders can be placed. In addition, this year we have created a new supplier due diligence questionnaire which enhances the supplier audit programme and incorporates questions on compliance with modern slavery requirements.

Internally we verify the identity and right to work of every employee by inspecting original passports and visas to ensure that there are no potentially vulnerable employees. We only use agencies that have been verified through our internal due diligence processes.

Any concerns arising from the above processes are escalated to senior level.

4. Training

Our Corporate Compliance Training Programme provides appropriate compliance training to all relevant employees including specific content around modern slavery and human trafficking and how to report it. All new employees are trained on and commit to follow our Code of Business Conduct as part of our induction process.

In addition, through our Learning Management System introduced in the last financial year we will be able to ensure all relevant employees are trained and kept up-to-date with developments in this area.

5. Looking Ahead

In the next financial year, we will update our distributor onboarding and due diligence to further embed their commitment to this key area of our Code of Business Conduct. We will also roll out further training for key areas of the business where an impact can be made in guarding against modern slavery and human trafficking.

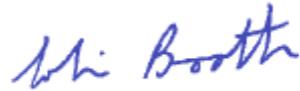
In addition, and as part of our commitment to s.54 compliance, we will be considering throughout the next financial year how best we can verify the effectiveness of the steps taken by the business.

Board Approval

This statement has been approved by the Board of The Binding Site Group Limited.

Handwritten signature of Mark Culwick in black ink.

Mark Culwick
Chief Financial Officer

Handwritten signature of Colin Booth in blue ink.

Colin Booth
Director of Quality and Regulatory