

The Binding Site Group – Modern Slavery Statement

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 prevent modern slavery and human trafficking in our business and supply chain, for the financial year ended 30 September 2019.

About us and our Supply Chain

The Binding Site Group is an international manufacturer and supplier of specialist, regulated, medical diagnostic products which improve the diagnosis and management of blood cancers and immune system disorders. 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. These goods and services are primarily from countries based in Europe and the USA. Production takes place in both the USA and at our UK head office. We supply our products directly, via our subsidiaries and branches in Europe and the USA and through our worldwide network of distributors.

Our Policies

We strongly believe in fair and ethical working practices and are strongly opposed to slavery and human trafficking. This principle is enshrined in our **Code of Business Conduct** which every employee of The Binding Site and its group companies must adhere to and which is published internally and shared externally. In addition, via our Whistleblowing Policy we encourage our employees to report concerns relating to slavery and human trafficking without fear of reprimand.

Due Diligence and Assessment of Risk

Our key suppliers (assessed according to criticality, risk and value) undergo regular quality audits (which may include physical inspections) and our distributors are always subject to due diligence prior to appointment. These processes are documented and are designed to assist in the identification of potential slavery and human trafficking.

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. Specific checks are in place to identify any suppliers based in countries considered to be high risk on the Global Slavery Index. Since 2017 any new supplier based in or controlled from a high risk country must be approved at board level before orders can be placed.

Through our contracting process with our suppliers, distributors and customers we promote compliance with the Modern Slavery Act both in form and spirit. 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 weakness and risk in relation to modern slavery. In working closely with suppliers and distributors we are progressively looking to identify weaknesses and exposure to modern slavery within our supply chain.

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.

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.

Looking Ahead

The Binding Site's Chief Financial Officer is ultimately responsible for ensuring the effectiveness of and the Group's compliance with all policies, procedures and training requirements set out in this statement. This includes an annual review with the Board to ensure our continual improvement and commitment in this key area of our Code of Business Conduct. In the last financial year, we have seen the successful implementation of our new learning management system, which will facilitate online training. In the year ahead, we are looking to utilise this system further in relation to our commitments on modern slavery and general compliance.

We are also looking to enhance our supplier audit processes to further underline the emphasis we place on ethics and sustainability.

Board Approval

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



Mark Culwick
Chief Financial Officer



Colin Booth
Director of Quality and Regulatory

9 March 2020