

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

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 in order to exploit them for personal or commercial gain.

Octapharma Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in the business or supply chain.

### **Our Business and Commitment**

Octapharma Ltd is the UK and Ireland subsidiary of the global Octapharma organisation. Octapharma is one of the largest human protein product manufacturers in the world, developing and producing human proteins from human plasma and human cell lines.

Octapharma Ltd is a Sales and Marketing operation using UK and Ireland distribution partners to supply Octapharma products to customers. Products are not manufactured within the UK or Ireland.

We directly employ 16 people on full time contracts (we do not offer zero hour contracts) and they are not in any category which is seen to be vulnerable to modern slavery in the UK or Ireland, so our main focus is to ensure that there are policies and due diligence procedures in place for our suppliers.

Octapharma is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any other parts of its business. Octapharma Ltd will not knowingly use unlawful child labour or forced labour in any of the products or services it provides, nor will Octapharma Ltd accept products or services from suppliers that employ or utilise child labour or forced labour.

We are committed to acting ethically and with integrity in all of our business relationships and to implement and enforce effective systems that will promote ethical and lawful employment practices and obligations in accordance with the Modern Slavery Act 2015.

### **Responsibility for the Modern Slavery and Human Trafficking Policy**

Octapharma Ltd has appointed its General Manager and Human Resource Manager as its Modern Slavery and Human Trafficking Officers, and will take appropriate steps to ensure compliance with the Policy by the company, its suppliers, subcontractors and business partners.

Management at all levels within Octapharma Ltd are responsible for ensuring that those reporting to them understand and comply with the company's Modern Slavery and Human Trafficking Policy and are given adequate training.

Octapharma Ltd employees are invited to comment on the Policy and suggest ways in which it might be improved.

### **Policy Compliance**

All employees must ensure that they read, understand and comply with the policy.

All employees are responsible for the prevention, detection and reporting of modern slavery in any part of the business or supply chain. Employees must notify a Modern Slavery and Human Trafficking Officer as soon as possible if they believe or suspect that a conflict with, or breach of, the Policy has occurred, or may occur in the future. Employees can also report any suspected breach by following Octapharma's whistleblowing policy.

## Definitions

**Human Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

**Forced Labour:** All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labour:** Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

## Due Diligence Process

Octapharma Ltd has carried out the following to identify and mitigate risk:

- Where possible Octapharma Ltd builds long-standing relationships with local suppliers and makes clear its expectations of business behaviours;
- With regard to national or international supply chains, Octapharma's Ltd point of contact within the UK or Ireland is expected to have suitable anti-slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistleblowers.

## Adherence of Suppliers to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The department heads are responsible for compliance in their respective departments and for their supplier relationships.

## Requirements for Suppliers:

- Will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws;
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable laws concerning the maximum hours of daily labour;
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and or human trafficking outside the UK/Ireland which would constitute an offence if that conduct took place within the UK/Ireland; and
- Will ensure that any sub-contractors or suppliers from whom they source goods and or services for incorporation in those supplied to Octapharma Ltd also adhere to these requirements.

## Certification

Suppliers will certify compliance with this Statement and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

## **Audits**

Upon request, suppliers must be able to demonstrate compliance with this Statement to the reasonable satisfaction of Octapharma Ltd. Octapharma Ltd may perform periodic audits in relation to this Statement and Suppliers are expected to fully co-operate with any such audit.

## **Reporting**

Any breach of this policy can be reported to the Human Resource Manager or General Manager, in their capacity as Octapharma Ltd's Modern Slavery and Human Trafficking Officers.

Suppliers who are found to have or be engaging in human trafficking and slavery or who refuse to co-cooperate with any audit to verify compliance with this Statement will be liable to have any supply agreement, arrangement or other contract with Octapharma Ltd terminated immediately, without compensation.

If a supplier to Octapharma Ltd is found in violation of this Statement, Octapharma Ltd will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other steps as the Modern Slavery and Human Trafficking Officers shall determine to be necessary to address the violation and seek to prevent its recurrence.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will continue to provide training to new employees and regular briefings to employees on compliance issues when necessary.

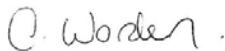
## **Future**

Octapharma Ltd will investigate partnering with the UK Government and third parties such as the Transparency in the Supply Chain (TISC) organisation in order to drive awareness of, and compliance with, the UK Modern Slavery Act 2015.

We will continue to review our procedures to help us identify, prevent and mitigate any risks of modern slavery entering into our or our suppliers' operations.

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This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Octapharma Ltd's position for the current financial year.

A handwritten signature in blue ink, appearing to read "C. Worden".

Clare Worden  
General Manager  
Octapharma Ltd  
January 2024