

# Modern Slavery Act 2015 Statement

## Introduction

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that the Proteintech Europe has taken during its financial year 2024/25, or will thereafter be taking, to ensure that no slavery or human trafficking is taking place within any part of its business or any of its supply chains.

## Our company structure, business and supply chains

We have approximately 24 full time employees and up to 20 part time temporary workers at any one time. All are employed directly on contracts fully compliant with UK laws and regulations. We have a further 6 full time sales staff based in Europe employed via local payroll processors all fully compliant with local laws and regulations.

Proteintech Europe operates from Transmission offices on Atherton Street in Manchester City Centre. From here we distribute laboratory reagents for life science research within the United Kingdom and overseas (this can be direct or via distributors with whom we collaborate). Our site in the UK also comprises Sales and Marketing functions who attend exhibitions in the UK and internationally, as well as purchase various marketing service and materials. We have a small technical team also subject to occasional travel for training or marketing purposes.

We aim to identify and only work with suppliers and organisations whose values and standards match our own. We expect all suppliers and organisations we do business with to adopt and enforce equivalent policies in their own operations and to encourage their own suppliers to do the same.

Were we to identify any concerns or areas for improvement we would in the first instance work with relevant suppliers, representatives and educational establishments to ensure they were satisfactorily addressed and would then monitor them to ensure continued compliance. As a last resort, we would seek to terminate relationships with anyone who refused to take remedial action or who failed to share our policy of zero tolerance of slavery and human trafficking.

## Our policies

We are committed to maintaining the highest ethical standards and to ensuring that no slavery or human trafficking is taking place in any part of our business or supply chains.

We comply with all legislation and regulatory requirements in relation to slavery and human trafficking. Everyone in our business is required to uphold the highest standards of integrity in their business activities and to comply with all applicable laws of the United Kingdom and other countries in which they are working.

Our Modern Slavery Policy provides an overview of our approach towards eliminating modern slavery and labour exploitation from our business and supply chain. It outlines our commitment to continually assess and address risks, to operate with the highest standards of integrity, openness and accountability in all our business activities and relationships, to support and protect people who raise genuine concerns, to thoroughly investigate all concerns of modern slavery and labour exploitation.

Our Corporate Social Responsibility Policy refers to our responsibilities toward society and the environment; outlining our compliance with the law and business ethics. It covers protections of the environment and human rights.

Our Duty of Care Policy covers Proteintech Europe's obligation to provide a safe place of working.

Our Sustainable Procurement Policy sets out the principles to which our procurement activities should adhere, including the requirement that our procurement practices are undertaken in a safe, ethical and cost-effective manner and deliver sustainable outcomes, in line with our modern slavery commitments.

### **Assessment of areas of high risk**

We have assessed our business areas and supply chains and consider the following of them to be the most likely to give rise to a risk of slavery or human trafficking:

- Provision of services for example cleaning, security, catering, hospitality
- Supply of food and drink
- Supplies from high risk areas those known to have either; high percentages of migrant workers, governments that cannot or will not protect human rights, weak rule of law, high corruption
- Supplies of electronics (due to the mined elements such as copper, gold, tantalum and tungsten required for manufacture)

### **Key responsibilities**

Our Finance team is responsible for evaluating all new suppliers. However the majority of transactional purchasing is devolved to individual departments which are required to comply with our purchasing policies and procedures. We have emphasized the awareness to these departments of the risk of slavery or human trafficking in the above high risk business areas.

Our HR team is responsible for recruiting all temporary and permanent staff and for supporting the management and development of staff. We comply fully with all applicable legislation (this includes limits on working hours). The training of new starters on Modern Slavery and how to identify is key prior to commencing business travel due to the higher prevalence of risk when purchasing food, refreshments and services whilst on the road.

### **Due Diligence**

We undertake checks for each new employee to ensure that the individual has the legal right to work in the UK and will receive their salary directly and not be paid to a third party. As part of the employee's on-boarding process, a physical copy of an employee's Right to Work evidence is obtained in line with Home Office guidance. All wages are then paid electronically using bank account details which must match the employee's personal details on their Right to Work evidence. Where such details do not match, the HR team undertakes further investigation.

We provide training to our staff including an introduction to the risks of modern slavery and we have made completion of that module compulsory for staff who are working in risk areas.

We have reviewed and will continue to review our existing suppliers in the areas we assess as being 'at risk' to check the steps they have taken and are taking to eliminate slavery and human trafficking from their business and supply chains. No concerns have been identified during this financial year, but appropriate action will be taken to address any concerns we identify.

### Achievements

- We made MSA training a mandatory training module for all new starters.
- Modern Slavery was introduced into our company policies where appropriate.
- We sought to identify modern slavery risks within our supply chains.
- Completion of the MSAT via the GOV.UK website.

### Plans for 2025/26

- Raise the profile of Modern Slavery through training and awareness
- Review our Modern Slavery Statement and continue to develop our policies and processes in line with good practice and procedures.
- Ensure all staff are paid the UK Living Wage - an improved rate of pay scheme which exceeds the National Minimum and National Living Wage (calculated annually by the Resolution Foundation and overseen by the [Living Wage Commission](#), based on the best available evidence about living standards)
- Survey our supplier base to identify those who pay the UK Living Wage accredited rate and include the requirement for all suppliers to pay this rate in future contracts as part of the procurement process if possible.
- Audit suppliers whom we consider having a higher risk of the presence of modern slavery or human trafficking which may, for example, be due to the nature of their services or due to the composition of their workforce. We also undertake rolling audits of lesser risk suppliers as a matter of course. As part of the audit, we seek to:
  - Ascertain that the supplier is compliant with the requirements of the Modern Slavery Act.
  - Understand the risk of modern slavery and hidden labour exploitation in the business and supply chain of the supplier.

Further information on Modern Slavery can be found at the [UK Legislation](#) website.

Signed by:



Kier Wilkinson  
Managing Director

Date: Friday 8 November 2024