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| <b>SOP Reference</b>       | BUS-SOP-GEN-009-v01   |              |          |
| <b>SOP Title</b>           | Modern Slavery and Human Trafficking Statement  |              |          |
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| <b>Approver Name/Title</b> | Emily Gestopa, HR Director  |              |          |
| <b>Approver Signature</b>  | <u><i>Emily Gestopa</i></u><br><small>Emily Gestopa (Aug 6, 2024 13:57 GMT+1)</small> | <b>Date:</b> | 06/08/24 |
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## 1. **Purpose**

- 1.1. This statement has been published in accordance with the Modern Slavery Act 2015 and sets out Bionical Health Limited's position on combating slavery and human trafficking in its operations and supply chain.

## 2. **Scope**

- 2.1. This statement applies across all functions and business units of Bionical Health Ltd in the UK.

## 3. **Affected Staff**

- 3.1. This statement applies to all Bionical Health staff, including all employees, officers, consultants, contractors, casual workers and agency workers.

## 4. **Related and Reference Documents**

The Bionical Code

## 5. **Modern Slavery Statement**

Modern slavery – commonly called ‘slavery’, ‘child labour’ and/or ‘human-trafficking’ – 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. These are heinous activities that we will never engage in or condone as a business, and that we condemn in others who engage in them.

Bionical Health has a zero-tolerance approach to modern slavery and will not engage in business of any description with any business who does so. We are committed to combating slavery and human trafficking both in its operations and supply chain. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

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Bionical Health is committed to improving patient outcomes. We deliver services globally to the pharmaceutical and healthcare sectors.

We work with many pharmaceutical companies, large and small, in the course of our business and comply with those companies' policy requirements with respect to modern slavery, among many other areas of regulation and good practice.

We operate in a highly regulated sector and therefore we believe that there is a low risk of Slavery, Human Trafficking or Child Labour in connection with our commercial activities.

Bionical Health's internal policies include our Bionical Code which defines who we are and how we do business:

<https://www.bionical.com/file-manager/our-code-of-conduct/index.html?page=1>

If we discover that any business or individual associated in any way with our business is engaged in, or otherwise supporting, and/or condoning or failing to prevent such activities, when such activities are within their control and/or influence, we will cease all connection with them. We will also consider whether we are under any reporting or other legal duty in respect of this disassociation and our reasons for it.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Failure to comply with this policy may result in disciplinary action, including dismissal or termination of your contract with Bionical Health Limited. It could also involve other legal steps being taken against you.

If you have any queries about this policy or any concerns about activities that are identified within it, and which may affect our business, please raise them without delay with the HR Director, who is our designated anti-slavery officer and responsible for this policy.

### **Prevention of these prohibited activities**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the HR Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur, in the future.

We also encourage you to raise concerns about any issue, or suspicion, of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with a member of the HR team ([HR@Bionicalhealth.com](mailto:HR@Bionicalhealth.com)).

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We do not anticipate that any circumstance would arise in the operation of our business activities. However, we invest in making the appropriate checks on all employees, workers, recruitment agencies, and suppliers to be certain who is working for, or on behalf of, us and that they are permitted to work and paid fully and fairly for what they do.

All our employees are paid fairly according to legal requirements and market practice, the arrangements for which are properly and lawfully set out in their written contracts of employment or zero hours contracts for workers.

The health and safety of all of our employees and workers is also of paramount importance to Bionical Health Limited and we take our legal obligations very seriously, including in relation to working hours, rest breaks, and holidays.

### **Reporting obligations of Bionical Health Limited’s Employees and/or workers providing services**

We expect you immediately to report to the HR Director any reasonable grounds for believing that any of the prohibited activities listed in this policy are occurring in any of our business activities or supply chains.

Our designated person, identified above, will take any report made to them very seriously and will promptly and responsibly investigate the allegations made or suspicions shared. They will make recommendations to and agree with our senior management on the actions that should be taken following any such investigation.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a member of the HR team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure, which can be found set out in our Grievance Policy. You can find a copy of this within the in house HR system.

### **Compliance obligations on Bionical Health Limited’s suppliers**

We are mainly a provider of services rather than goods and so our supply chains are limited to suppliers of general business support goods and services. We will take action to terminate existing contracts with, and to pursue appropriate legal remedies against, any suppliers who we subsequently discover to have been operating in breach of this policy.

To ensure a high level of understanding of the importance of the Bionical Code, we provide training to our staff on this and the reporting process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Bionical Health’s slavery and human trafficking statement.

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**Further Steps**

We will continue to regularly review the effectiveness of the steps that we have taken to ensure that there is no slavery or human trafficking in our supply chain.

**6. Version History**

| <b>Version</b> | <b>Change Request Reference</b> | <b>Reason for Change</b> | <b>Date of Issue</b> |
|----------------|---------------------------------|--------------------------|----------------------|
| 01             | N/A                             | Initial Document         | 01 August 2024       |









# BUS-SOP-GEN-009-v01 Modern Slavery and Human Trafficking Statement

Final Audit Report

2024-08-06

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