

Anti-slavery and Human Trafficking

Introduction

Human trafficking and slavery are crimes under UK and International Law. These crimes occur throughout the world and therefore this document defines Octapharma Ltd commitment to ensuring that human trafficking and slavery does not exist within its business.

Our Business and Commitment

Octapharma Ltd is the UK 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 who uses UK distribution partners to supply Octapharma products to its customers. Octapharma Ltd does not manufacture products within the UK.

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 and services from suppliers that employs or utilise child labour or forced labour.

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

Responsibility for the Policy

Octapharma Ltd has appointed its General Manager and the Human Resource and Facilities Manager as its compliance officers and will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its, suppliers, subcontractors and business partners.

Management at all levels within Octapharma Ltd are responsible for ensuring those reporting to them understand and comply with the policy, and are given adequate training on Modern Slavery.

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

Octapharma Limited
The Zenith Building
26 Spring Gardens
Manchester
M2 1AB

Office: +44 (0)161 837 3770
Fax: +44 (0)161 837 3799
Email: octapharma@octapharma.co.uk
Web: www.octapharma.co.uk

Policy Compliance

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 compliance officer as soon as possible if they believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur in the future. Employees can also report any suspect 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 Processes for Slavery and Human Trafficking

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

- Where possible Octapharma Ltd build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, Octapharma's Ltd point of contact within the UK 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 whistle blowers.

Supply Chain Suppliers Adherence to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors 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 law 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 which would constitute an offence if that conduct took place within the UK; and
- Will ensure that any sub-contracts 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 policy 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 policy to the reasonable satisfaction of Octapharma Ltd. Octapharma Ltd may perform periodic audits on 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 HR and Facilities Manager or General Manager, in their capacity as Octapharma's Anti-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 policy 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 policy, 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 Anti-Slavery and Human Trafficking Officers shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

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 provide training and regular briefings to relevant members of staff on compliance issues.

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



Sue Griffin
General Manager
9 January 2017