

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT – JUNE 2021

### INTRODUCTION

This is the SYNLAB Group's Modern Slavery and Human Trafficking Statement under Section 54 of the UK Modern Slavery Act 2015 for the financial year 2020. Modern slavery is a broad term that encompasses slavery, servitude, forced and compulsory labour and human trafficking. The SYNLAB Group is committed to the UK Government's objectives of eradicating modern slavery and human trafficking. Subsequently, the SYNLAB Group is committed to ensuring that the supply chains of its subsidiaries and their business activities are free from ethical and labour standards abuse. This statement summarises the measures that the SYNLAB Group has taken to assess and address the risk of modern slavery in its business and supply chains.

### OUR ORGANISATIONAL STRUCTURE, BUSINESS MODEL & SUPPLY CHAIN

SYNLAB Limited was the ultimate parent company of all the subsidiaries that belong to the SYNLAB Group of companies (**SYNLAB**) during 2020. SYNLAB Limited provides head office support activities to its subsidiaries by way of providing guidelines, advice and assistance. SYNLAB Bondco PLC is ultimately owned by SYNLAB Limited and a non-operational debt issuing vehicle, providing financing to the SYNLAB Group. Our UK operating business activities are carried out by Labco UK Group Limited and its subsidiaries.

We are an international diagnostic service provider. We provide analytical, diagnostic and pathological services in the field of human and veterinary medicine diagnostic. We offer our services in 36 countries in four continents (Europe, Latin America, Africa and Middle East/Asia), having more than 24,000 employees (**Members**).

In providing our services, we rely on the supply of technical equipment provided by suppliers of analytical machinery and technology for laboratory analyses/diagnostic testing, as well as reagents and chemicals utilized in such testing. Goods and services are provided by professional services companies, subcontractors including couriers and sub-processors of test samples. In addition, we rely on external professional services providers in relation to our head office support, including financing related activities as well as its corporate and financial housekeeping.

### OUR POLICIES

We have adopted a **Code of Conduct**, setting out our commitment to act ethically and with integrity in all our business relationships. The Code of Conduct is currently being implemented within our Group. In addition, our UK entities have adopted a dedicated policy on anti-slavery and human trafficking. All our Members must comply with all relevant laws and regulations (including those on modern slavery and human trafficking) and they must respect the personal dignity, rights, and diversity of everyone within and outside SYNLAB. We support all our Group companies with a view to ensure compliance with our Code of Conduct.

### TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all starting and current Members in the UK have to complete a training module annually on modern slavery and human trafficking.

### DUE DILIGENCE & RISK ASSESSMENT

We acknowledge that slavery and human trafficking exist in many jurisdictions in which we operate, and/or from which we procure goods or services. Our overall objective is to establish and maintain relationships with our suppliers that will minimise the risk that slavery or human trafficking could occur within our supply chains.

Our due diligence approach is based on inclusion of our relevant functional teams, such as legal, compliance, M&A, and procurement. We are continuing to invest in tackling modern slavery by implementing various instruments, including the introduction of MSA provisions in our supplier contracts and the circulation of supplier assessment questionnaires.

To mitigate against the risk of modern slavery and human trafficking in our supply chain, risk assessment and due diligence will continue to focus on our first-tier supplier relationships. It is understood that we need to refine our risk assessment in accordance of our findings. We are taking steps to establish frameworks in which all elements of our supply chain are expected to observe applicable laws and operate in accordance with our Code of Conduct.

We are taking steps to improve our systems and procedures to detect potential modern slavery and human trafficking risks arising around particular products and geographical areas.

We have a dedicated Compliance Committee, which consists of the Group Chief Executive Officer and Chief Financial Officer, chaired by the Group Chief Compliance Officer. The Compliance Committee is supported by Regional Compliance Officers. In 2020, no reports on human rights violations have been made by the Regional Compliance Officers.

### EFFECTIVE ACTIONS TAKEN

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain:

**Anti-slavery and human trafficking clauses:** We included an anti-slavery and human trafficking clause in our procurement templates. In addition, we are amending existing procurement contracts of our top global first tier supplier to confirm MSA compliance within our supply chain.

**Training of our Members:** We carried out modern slavery and human trafficking trainings for the vast majority of our Members in the UK and the most relevant Members of Group HR, Group Procurement and Group Legal.

**CEO Message:** Our CEO emphasised our social responsibility and ethical principles during regular CEO 'check-in' meetings.

**ESG Initiative:** We started an environmental, social and governance (ESG) group wide initiative, aiming to reflect on the most significant ESG risks and opportunities from both SYNLAB and our stakeholders' perspective. Modern slavery and human trafficking will be part of the ESG Report to be published in 2021.

### LOOKING AHEAD

We understand that combating modern slavery and human trafficking is an ongoing imperative. In 2021, we will continue to invest in doing so. Our actions will comprise:

**Policies:** We plan to implement a dedicated Group policy on anti-slavery and human trafficking.

**Training for our Members:** We will continue to raise awareness on modern slavery and human trafficking among our Members.

**Supplier Questionnaire:** We will continue to issue our supplier questionnaire to our suppliers, continuing to ensure that our supply chain complies with our ethical standards set out in our Code of Conduct.



**Thomas Evans**  
Director, SYNLAB Limited