



Diagnostica Stago UK Ltd.
2 Theale Lakes Business Park
Moulden Way
Theale RG7 4GB · United Kingdom

+44 (0) 845 054 0614 · +44 (0) 845 054 0625
stago-uk@stago.com

www.stago-uk.com

Annual Modern Slavery Statement

This statement is made on behalf of Diagnostica Stago UK Ltd (“**Stago UK**” or “**we**” or “**us**”), pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2022.

Stago UK is not required to produce this statement under the Act and is doing so on a voluntary basis. We recognise that issues of modern slavery may impact Stago UK, and we are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

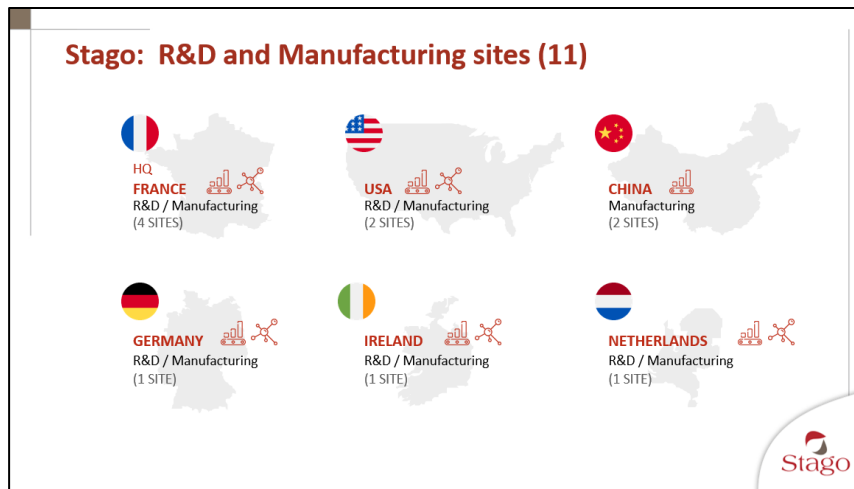
This statement sets out the steps that we have taken and are taking to minimise the risk of modern slavery and human trafficking taking place in our business or any part of its supply chain.

At Stago UK, we respect and promote human rights in our activities and business relations. Stago UK assumes a responsibility to ensure that its employees work in ethical and non-hazardous conditions. Stago is also committed to safeguarding against its business partners, including customers and suppliers, using or supporting any form of forced labour. We expect our employees, suppliers, and customers to adhere to these same standards.

About Stago and its business

Stago UK forms part of the Stago Group (the “**Group**”). The ultimate parent company is Stago International (France) (“**Stago International**”). The Group started as a pharmaceutical laboratory, founded in 1945, which now operates in the In Vitro Diagnosis (IVD) industry, wholly dedicated to the exploration of haemostasis and thrombosis. One of the Group’s key functions is to provide the industry with diagnostic and testing tools and equipment to best equip specialists to detect and treat haemostasis and thrombosis in patients.

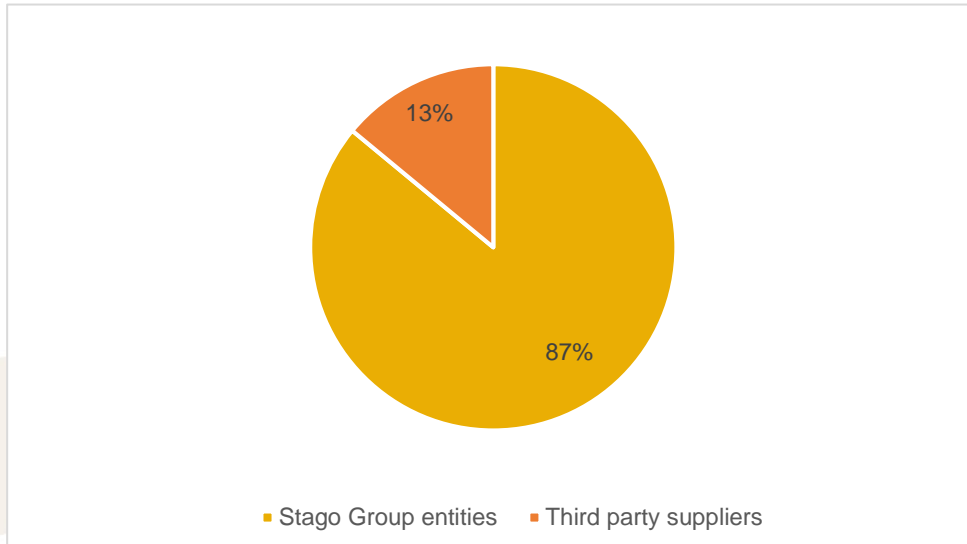
The Group’s global operations are headquartered in France. There are six Research and Development Centres across France, Ireland, the Netherlands, and the US. There are eleven Manufacturing Plants across France, Ireland, Germany, the US, and China (for the Chinese market only). There are five Logistics Centres across France, Germany, the US, Australia, and the UK.



Stago UK is a company incorporated in England and Wales. As of 31 December 2022, Stago UK had 22 employees. With a team covering a wide range of specialisms, Stago UK can assist its customers with the development of their haemostasis and haematology service at all stages. By investing in UK warehousing and logistics, Stago UK provides fast, reliable deliveries for the products required for its customers' laboratory services to run smoothly. Stago UK provides distribution and logistics services to the UK only.

Our supply chains

Stago UK's main suppliers are intra-group subsidiaries. Given the distribution focus of Stago UK in the UK, Stago UK mainly purchases the Group's products and services from Diagnostica Stago SAS, a French company which manufactures Group products, predominantly in France, and distributes them to UK customers, mainly laboratories in NHS hospitals. Out of its top ten suppliers in 2022, 87% of Stago UK's supply (by spend) was from companies within the Group, mainly from Diagnostica Stago SAS in France. The remaining spend came from third party suppliers, mostly based in the UK, such as the lease of the office, our car leasing supplier, insurance, freight services, marketing and promotion.



Stago's supply chain structure supports the complexities of supply and manages associated risks, including compliance with regulatory directives and monitoring suppliers' performance and financial stability. The local supply chain structure includes a procurement team who procure orders directly from within the Group and other managers who do the same within their field of expertise.

Our policies on slavery and human trafficking

We have the following policies in place relevant to modern slavery, which we regularly review and update:

- The Group Global Code of Business Ethics and the UK Supplement
- The Stago UK Code of Business Ethics, including a policy on Assessment for third parties procedure and a Due diligence procedure
- Whistleblowing Mechanism

Due diligence processes for slavery and human trafficking

Stago UK selects its business partners carefully and objectively, taking into account their reputation, quality of their services and their commitment to act in compliance with current regulations and the highest ethical standards.

Stago UK predominantly only enters into contracts that are subject to and safeguarded by the UK government Public Procurement Policy. Where contracts are not subject to such policy, Stago UK will first:



- verify the supplier's reputation, skills and activities using Stago's Assessment for Third Parties procedure; and
- formalise the terms and conditions of the relationship through a binding written contract, which may include appropriate safeguarding clauses.

We have also put in place systems to:

- Protect whistle blowers, through our comprehensive whistleblowing mechanism (please see the Risk Assessment and Management section for further information.)

We endeavour to put in place systems to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

At present, Stago UK is in the process of implementing a process to carry out detailed due diligence in relation to integrity or human rights on any third-tier supplier third party that it works with. However, a whole third-party evaluation process is to be deployed in the second half of 2023 for Stago UK and in 2024 for Diagnostica Stago SAS, which is the manufacturer and supplier of all Stago products for all its distributors around the world, including Stago UK and other Stago group companies.

Risk assessment and management

Stago UK understands that certain goods and services may pose higher risks of modern slavery due to the types of activities being associated with established risk factors. That is why Stago UK is committed to having appropriate risk assessment and management processes in place to mitigate the effects of modern slavery within our business and supply chains.

Accordingly, we propose to implement a process of assessment of our business and its supply chain. The aim of this assessment is to enable us to identify specific features of our operations and environment that present higher risks of slavery.

Stago Code of Business Ethics

Stago International has an internal and external facing Global Code of Business Ethics (the "**Code**"), applicable to all employees, customers, and suppliers of companies in the Group. This Code sets out its work ethos, and highlights fundamental requirements with respect to workers' rights, and in dealings with our suppliers which promote honesty, integrity and to act with care and diligence.

The Code incorporates a UK focussed Code of Business Ethics for Stago UK, which is predominantly an internal facing document setting out the UK legal and regulatory requirements applicable to Stago UK employees.



The Code has been communicated to all employees and is readily accessible on the internet website of Stago UK . Employees were, and are required on joining Stago, to sign the Code and undertake to comply with its terms.

Stago UK will undertake a review of the Code during 2023 to ensure compliance with current applicable laws.

Compliance officer

The Group Ethics Committee has appointed a dedicated Compliance Officer in 2017 for Stago UK . its role is to:

- coordinate the programs on ethics and compliance;
- to help Stago UK employees resolve any questions or concern regarding the Code and other related matters; and
- to assist the business in dealing with any compliance issues that may arise.

Ethics Committee

A Group Ethics Committee has also been created at Stago International's headquarters in Asnières, France. A local Compliance Officer has also been designated for the different Stago entities within the Group.

Stago UK Employees who report a concern in good faith about an alleged Code violation are protected from any form of retaliation.

Reporting and alert system

Each employee of the Group may alert the Compliance Officer or Ethics Committee if they observe a breach of applicable law or any type of behaviour which is contrary to the Act (“**whistleblowing mechanism**”).

The Group has implemented since 2017 an internal and external whistle-blowing mechanism intended to compile employee-generated or customers' alerts of the existence of conduct or situations contrary to any applicable laws and Stago's Code of Business Ethics and protect employees who operate those alerts.

The Group has a Group Ethic Committee, to whom all concerns regarding modern slavery should be addressed. This provides employees with the comfort that they can make reports anonymously. In the context of modern slavery, we believe that this can be an important asset in assisting employees to raise issues if they perceive there to be a risk of modern slavery practices.



Our effectiveness in combating slavery and human trafficking

Stago UK will assess the effectiveness of its contractual obligations and internal processes via the following practices:

- regularly reviewing and updating of Stago's standard supplier contractual terms to include a requirement that the supplier aligns with our modern slavery obligations;
- implementing regular and systematic reviews of our business and supply chain operations with respect to modern slavery risks and practices;
- identifying and tracking whether our suppliers can demonstrate to us their modern slavery awareness and due diligence processes;
- recording and assessing the nature and volume of any complaints or information about modern slavery risks through our established policy communication channels, including our whistleblowing mechanism and our Group Ethic Committee;
- introducing an effective performance monitoring system using KPIs to monitor our growth in combatting modern slavery.

Training

Stago has implemented a training mechanism for employees in the UK to ensure a high level of understanding ethical business practices. A training session on the Code and the preventions of corruption was delivered to all Stago employees by an external provider in 2017. Stago is in the early stages of organising a refresher training session for all Stago employees, currently anticipated to be held in May 2023 which will include the risks of modern slavery and human trafficking present in our business and its supply chains.

Our plans for the future

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in Stago supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- The deployment of third-party evaluation process specifically designed to identify issues with integrity or human rights in the Group
- The introduction of supplier onboarding mechanisms and regular supplier questionnaires
- Specific training on the risks of modern slavery and human trafficking present in our business and its supply chains



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. This statement was approved by Leanne Annereau, General Manager and Board Director of Stago UK, on May 5, 2023

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Leanne Annereau
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Signed

Leanne Annereau

Diagnostica Stago UK Limited

Date:

