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Modern Slavery and Human Trafficking Statement **Bracco UK Ltd.**

Financial Year: January – December 2024

Introduction

At Bracco UK Ltd, we are committed to upholding the highest standards of ethical conduct and integrity in all our business activities. This includes a zero-tolerance approach to modern slavery, forced labour, and human trafficking. We are dedicated to preventing such practices within our organisation and supply chains. This statement outlines our actions to address the risks of modern slavery and human trafficking in compliance with the UK Modern Slavery Act 2015.

Our Business

Bracco UK Ltd. is a subsidiary of the Bracco Group, a global leader in diagnostic imaging and pharmaceutical services. We operate in the healthcare sector, providing innovative solutions that enhance patient care and safety. As a socially responsible company, we recognise our duty to ensure that our business operations are free from modern slavery and human trafficking.

Responsibility: The Managing Director oversees anti-slavery measures, ensuring regular monitoring and updates.

Our Supply Chains

Our supply chains include suppliers of medical equipment, pharmaceuticals, technology, and related services. We understand that complex supply chains can present risks related to modern slavery, especially in certain geographic regions and industries. To mitigate these risks, we actively engage with our suppliers to promote ethical practices throughout our supply chains.

Bracco UK Ltd are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks.

We ensure we carry out supplier due diligence.

We require our suppliers to adhere to our Supplier Code of Conduct and we also conduct regular supplier audits to ensure suppliers are meeting our expectations.

We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices.

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Such as:

- Aggressive pricing that doesn't consider sustainable production costs
- Short lead times and late high-volume orders
- Inaccurate forecasting
- Late or extended payments
- Withdrawing from contracts at the last minute
- Enforcing unfair penalties for not meeting orders
- Making last minute changes to order specifications or volumes
- Providing inaccurate specifications

Areas of risk identified within the business and supply chain

Risk Assessment: We conduct risk assessments to identify suppliers and regions where there may be higher risks of modern slavery and human trafficking. This helps us prioritise our efforts and engage in targeted monitoring.

Bracco UK Ltd has an approved supplier list. The supply chain all operate in countries with robust regulation around Modern Slavery.

A desktop audit of these suppliers is conducted annually using the following methodology:

Supplier risk assessment:

1. The risk level is determined using the scale according to the global slavery index. <https://www.globallslaveryindex.org>
2. This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
3. Then the sector is checked against the ILO's Global Estimates of Modern Slavery

Findings:

1. 0 suppliers identified as medium risk
2. 0 high risk suppliers are on the list
3. Some of our suppliers are in manufacturing which is an identified risk factor

Assessment Criteria:

- 0 or 1 Risk factors – Low Risk
- 2 Risk factors – Medium Risk
- 3 Risk factors – High Risk

Tier 1

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as overall low.

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Further audit and due diligence is planned in the next financial year with the medium and high risk suppliers the first priority. This risk level will be reviewed yearly and reported on.

Tier 2

We have not mapped our supply chain in tier 2 at this time. This is an area of improvement that is under management review.

Policies and Commitments

The company positively encourages employees, agency workers, agents, consultants and any other person working on behalf of or with the Company to immediately report any instance where they are either exposed to slavery or suspect slavery is occurring in the workplace or supply chain. Bracco UK Ltd. has implemented a range of policies to prevent modern slavery and human trafficking within our business and supply chains. These include:

Human Rights Policy: Our Human Rights Policy outlines our commitment to support and respect internationally recognised human rights as defined by the International Bill of Human Rights and the International Labour Organisations principles. It applies to all operations within the group, emphasising a proactive stance against Human Rights abuse and the need to avoid infringing on others' rights.

Supplier Audit: We perform regular audits of our suppliers to ensure compliance with our standards and identify any potential issues. It is planned for these audits to expand their scope and include Modern Slavery questions.

Code of Conduct: Our Code of Conduct emphasises our commitment to ethical business practices, including prohibiting forced labour, child labour, and any form of exploitation.

Supplier Code of Conduct: We have a Supplier Code of Conduct, which mandates adherence to ethical labour practices and compliance with applicable laws, including the prohibition of modern slavery.

Due Diligence Processes:

To identify and mitigate risks related to modern slavery, we have established the following due diligence processes:

Training and Awareness: We provide training via our online portals to our employees to raise awareness about modern slavery risks and equip them with the knowledge to identify and report potential concerns.

The training covers:

- The ILOs Forced Labour indicators
- The training ensures that recipients understand
 - Indicators of modern slavery

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- How to report suspicions of modern slavery
- The modern slavery statement requirements
- How to consider modern slavery risks in procurement
- How to be better equipped to undertake modern slavery due diligence for the organisation

The training is mandatory and is provided on induction and then every 12 months.

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

1. a. The number of modern slavery cases identified and remediated
b. Update of the Modern Slavery Statement and completion of the MSAT yearly
2. Number of medium or high-risk suppliers completing our supplier self-assessment audit with the inclusion of modern slavery questions
3. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

Monitoring and Evaluation

We are committed to continuously improving our approach to preventing modern slavery. To this end, we regularly monitor the effectiveness of our policies and processes as specified within our Quality Management System. We follow the principles of continuous improvement, risk management, and uses CAPA to manage any deviations. We also engage with external stakeholders, industry bodies, and NGOs to stay informed about best practices and emerging risks.

Reporting and Accountability

Bracco UK Ltd. is dedicated to transparency in our efforts to combat modern slavery. Employees and others working with the Company are encouraged to report any suspicions

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of slavery within the workplace or supply chain. Any identified breaches of our modern slavery policies will be addressed promptly, with appropriate corrective actions.

If a case of Modern Slavery is suspected, then the following is advised. A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call local emergency (e.g. 911 in the US, 112 in Europe, 999 in the UK).

If there is no immediate risk to life, then contact the national helpline or report it online.

Helpline and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://www.europeanfreedomnetwork.org/hotline/	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Whistleblowing Policy: Our whistleblowing policy provides employees and other stakeholders with a confidential channel to report any concerns related to modern slavery or unethical conduct.

If there are concerns around modern slavery with any of our suppliers we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organization.

If the response from any of our suppliers, here in the UK or abroad, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected abroad, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remembering the economic influence and control which the organisation holds over those who may be committing these crimes.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions would then be included in the next statement produced.

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Breaches

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

External Reporting:

The Company is committed to notifying authorities of any suspected offences under the Modern Slavery Act 2015.

Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website, and also uploaded to the following register:

- <https://modern-slavery-statement-registry.service.gov.uk>

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

Director Approval

This statement has been approved by the Managing Director of Bracco UK Ltd. It will be reviewed and updated annually to reflect our ongoing commitment to addressing modern slavery and human trafficking in our operations and supply chains.

Signed:

Signed by:

A handwritten signature in black ink, appearing to read "Suzanne Oldham".

Signer Name: Suzanne Oldham

Signing Reason: I approve this document

Signing Time: 20-Jan-2025 | 6:43:19 PM CET

AE86B6F217C84038B540BF11070CF4BF

Name: Suzanne Oldham

Title: Managing Director
Bracco UK Ltd.

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