

# BIOCAIR MODERN SLAVERY STATEMENT 2025



MOVING **SCIENCE** FORWARD




## FOREWORD

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Biocair International Limited (known as Biocair) during the year ending 31st December 2025 to prevent modern slavery and human trafficking in its business and supply chain.

This statement is intended:

- to evidence the progress Biocair has made since its 2023 Modern Slavery Statement.
- to demonstrate that Biocair understands the risks of modern slavery and human trafficking are not static and that it recognises the need to review continually and update its approach.
- to show that Biocair remains committed to enhancing its capacity to identify, prevent and mitigate any actual or potential risks.

This statement has been approved by the Biocair Board of Directors and is signed on its behalf by Vincent Howard, Chief Executive Officer, Biocair International Ltd on 31st December 2025.



## BIOCAIR'S MODERN SLAVERY STATEMENT

Modern slavery is a heinous crime and a grave violation of fundamental human rights. It manifests in various forms, including slavery, servitude, forced and compulsory labour, and human trafficking—each involving the exploitation of individuals through the deprivation of their liberty for personal or commercial gain.

At Biocair, we uphold a **zero-tolerance approach** to modern slavery. Acting with the highest standards of ethics and integrity, we are steadfast in ensuring that modern slavery has no place within our business operations or supply chains. Through rigorous systems and controls, we proactively prevent, identify, and address any risks related to modern slavery.

We are equally committed to partnering only with organisations and suppliers that share our values. We actively assess and engage with our partners to ensure their practices align with our ethical standards, standing firmly against any form of human exploitation.

This statement highlights the concrete steps Biocair has taken to combat modern slavery within its supply chains. We also acknowledge that poor labour practices, exploitation, and human rights abuses often signal underlying weaknesses in management systems. Addressing these issues is critical to building a robust framework that safeguards against modern slavery.

# BIOCAIR'S COMMITMENT TO COMBATTING MODERN SLAVERY

Biocair reaffirms its unwavering commitment to addressing modern slavery and human trafficking in all forms. In alignment with the requirements of the UK Modern Slavery Act 2015, we will publish an annual Modern Slavery Statement outlining the comprehensive steps taken during the financial year to eliminate slavery and human trafficking across our business operations and supply chains.

This statement, publicly available on the Biocair corporate website at the end of each financial year, will serve as a transparent record of our progress and an evolving blueprint for continuous improvement. Each year, we aim to strengthen our efforts, build on previous achievements, and showcase measurable progress in preventing and mitigating modern slavery risks.

The Modern Slavery Statement will detail:

- **Organisational structure, business activities, and supply chains:** Highlighting how we operate globally and manage our partnerships.
- **Policy framework:** Demonstrating our zero-tolerance approach to slavery and human trafficking.
- **Due diligence processes:** Outlining the mechanisms we use to identify, evaluate, and address modern slavery risks.
- **Risk assessment and management:** Identifying vulnerable areas within our operations and supply chains and the measures we take to mitigate these risks.
- **Employee training and awareness:** Ensuring that our workforce is equipped to identify and report modern slavery concerns effectively.



Each annual statement will be rigorously reviewed, approved by the Biocair Board of Directors, and signed by a designated Director, underscoring our leadership's accountability and dedication to this critical issue.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### STRUCTURE

Established in 1986 in Cambridge, UK, Biocair began as a specialist logistics provider dedicated to the pharmaceutical, biotechnology, and life sciences sectors. Since 2002, Biocair has evolved into a truly global organisation, with a robust presence spanning the US, Asia, Europe, and Africa.

In 2012, Biocair joined the GeoPost SA family, part of Le Groupe La Poste and owners of the DPDGroup—the largest parcel delivery network in Europe. This strategic partnership has empowered Biocair with access to cutting-edge technologies, expansive global networks, and optimized routes. Together, these resources enable our logistics experts to deliver industry-leading supply chain solutions tailored to the unique demands of the life sciences sector.

For the purposes of this statement, "Biocair" encompasses Biocair Inc (US), Biocair International Ltd (UK), and its subsidiaries:

- Biocair France SAS
- Biocair Belgium N.V
- Biocair International Forwarding (Shanghai) Co Ltd
- Biocair Germany GmbH
- Biocair India Private Ltd
- Biocair South Africa (Pty) Ltd

## ABOUT BIOCAIR

Biocair is a global leader in GDP-compliant logistics, with nearly 40 years of expertise serving the pharmaceutical, biotechnology, and life sciences sectors. Our approach is uniquely client-centric, integrating scientific expertise into front-line logistics roles and leveraging a team of industry-leading specialists in quality, cold chain management, and regulatory compliance.

We are dedicated to delivering the most comprehensive, time-sensitive, and temperature-controlled logistics solutions available. By tailoring services to meet the specific needs of each client, Biocair ensures flexibility, reliability, and cost-effectiveness in every operation.

Operating 24/7 across a network that spans over 170 countries in Europe, Africa, Asia, and the Americas, Biocair is committed to supporting the life sciences industry with innovative, high performance logistics solutions that set the benchmark for excellence.



## GOVERNANCE

The Board of Directors comprises:

- Vincent Howard (CEO) – Biocair
- Phillippe Marchal – Geopost (since 31 October 2024)
- Benjamin Demogé – Geopost
- Gwenael Clement – Geopost

Governance of human rights is delegated to the Executive Leadership Team (ELT) which reports to the Biocair Board. The Executive Leadership Team comprises:

- Vincent Howard – Chief Executive Officer
- Graeme Randall – Chief Finance Officer
- Graham Dempsey – Chief marketing Officer
- Justin Morrison – Global Head of People
- Emma Turner – Chief Information Officer

Day-to-day responsibility for overseeing Biocair's ethical compliance, including Modern Slavery, sits with the Global Head of ESG and Risk, who reports directly to the Chief Executive Officer.





The Biocair Governance Committee met five times through 2025 and continued to provide assurance to the Executive Leadership Team and the Board that Biocair’s risk management strategies and governance arrangements are effective and appropriate to meeting governance and risk requirements of Geopost. The scope of the Committee includes Modern Slavery.

In 2023, Biocair established an enterprise-level Risk Committee which meets quarterly and comprises the members of the Executive Leadership Team and the Global Head of ESG and Risk. The committee met four times in 2025, and reviewed Modern Slavery risks as part of the Enterprise-level Risk Register.

## SUPPLY CHAINS

Biocair works with a diverse network of suppliers and contractors, categorized into two main groups:

### 1. Operational Logistics Suppliers and Contractors

This category includes airlines, couriers, agents, customs brokers, packaging houses, transport providers, and specialist storage providers. These suppliers play a critical role in Biocair’s logistics operations and are centrally selected and managed to ensure consistency and compliance.

To uphold ethical standards, all suppliers in this category—except airlines—are required to complete the **Supplier Code of Conduct Declaration**, which encompasses key areas such as modern slavery, human trafficking, and general labour standards.

### 2. Non-Logistics Suppliers and Contractors

This group comprises HR and recruitment service providers, facilities and office maintenance teams, cleaning and security services, suppliers of business consumables, and professional service providers, including legal, accounting, marketing, and consultancy firms.

Most of these suppliers are locally selected and, unless they are sole traders, are also required to complete the **Supplier Code of Conduct Declaration**, ensuring alignment with Biocair's ethical commitments.

Previous years' statements acknowledged that due diligence follow-up with suppliers and contractors across both categories needed to be enhanced.

In response, the planned **Procurement and Responsible Business Review** began with a comprehensive evaluation of the supplier onboarding process, alongside a review of related policies and operating procedures. The objective was to streamline the processes while reinforcing the requirements to ensure greater accountability and transparency. However, due to shifting business priorities, the completion of this important work has been postponed, with the new target date set for 2025.



## SUPPLIER DUE DILIGENCE PROCESS IN RELATION TO MODERN SLAVERY & HUMAN TRAFFICKING

Before onboarding, all new goods and service suppliers— including subcontractors— are required to complete a detailed questionnaire designed to assess their compliance with key standards across health and safety, environmental impact, human rights (including modern slavery), and business ethics. These standards are outlined in the **Supplier Code of Conduct Declaration**.

If a supplier's standards are found to be lacking, but there is a compelling business case for their onboarding, the supplier will undergo additional scrutiny. This review will be conducted in collaboration with the relevant Biocair subject matter expert to ensure comprehensive evaluation.

In 2023, Biocair launched the **Sustainable Procurement Charter**. This Charter requires suppliers to formally acknowledge and confirm their compliance through a signed declaration. The rollout of the Charter began in 2024, and will continue in 2025, effectively replacing the previous **Supplier Code of Conduct Declaration**.

Suppliers who fail to meet the standards set forth in both the Biocair Supplier Ethical Code of Conduct and the Sustainable Procurement Charter will not be approved to trade with Biocair. To monitor, review and manage supplier commercial and general compliance performance Biocair uses the following:

- Supplier Audit Procedure and Questionnaire
- Sustainable Procurement Charter
- Supplier Contracts
- Supplier Evaluation and Approval Procedure
- Supplier Continuous Improvement Procedure
- Supplier Monitoring, Evaluation and Review Procedure

Ethical compliance monitoring does not feature significantly in these procedures beyond initial supplier / contractor on-boarding checks. This will be addressed in 2025 with the launch of the Biocair **Responsible Business Questionnaire**.



## POLICY & PROCEDURES

Biocair maintains a zero-tolerance policy towards modern slavery and is unwavering in its commitment to acting ethically and with integrity in all business dealings and relationships. The company is dedicated to implementing and enforcing robust systems and controls to ensure that modern slavery is eradicated within its operations and throughout its supply chains.

As part of its broader corporate responsibility, Biocair is a signatory to the United Nations Global Compact through its parent company, Geopost SA. This underscores Biocair's steadfast commitment to upholding and advancing the principles of human rights, international labor standards, environmental sustainability, and the fight against corruption in both its business activities and its sphere of influence. These guiding principles are embedded in the following:

- **The Biocair Human Rights Standard**, which incorporates Biocair's Human Rights and Modern Slavery Statements, as well as the company's Modern Slavery Commitment. This Standard provides clear guidance on how to identify modern slavery and exploitation and includes detailed procedures for reporting any concerns.
- **The Biocair Supplier Ethical Code of Conduct**, which references a range of international human rights and labor standards, underscoring Biocair's commitment to these principles within its internal processes and procedures. It also sets clear expectations for suppliers to align with these standards. Additionally, the Code covers critical areas such as Human Rights and Fair Labour Practices, Freedom of Association, Child Labour, Bonded and Trafficked Labour, and Fair Wages.
- **The Biocair Procurement Policy**, which mandates that all suppliers uphold the highest standards of transparency and integrity throughout the corporate procurement process and during the execution and implementation of contracts, in full alignment with Biocair's Supplier Ethical Code of Conduct.
- **The Biocair Sustainable Procurement Charter**, which reaffirms Biocair's commitment to applying international principles related to labor and human rights, as defined by the International Bill of Human Rights, the OECD Guidelines, the fundamental Conventions of the International Labour Organization, the United Nations Guiding Principles, and the Sustainable Development Goals. This Charter also outlines the behaviors expected of Biocair suppliers to support these global commitments.
- **The Biocair Responsible Business Standard**, defines Biocair's approach to conducting business responsibly. It establishes a framework for promoting and strengthening socially responsible practices across all the territories where Biocair operates, with the flexibility to adapt actions locally as needed.

Additionally, the Standard highlights Biocair's expectations of its suppliers in addressing worker exploitation, forced labour, harassment, intimidation, human trafficking and the exploitation of children, young people or women.

- Biocair has introduced the **Biocair Whistleblowing Standard**, which includes a confidential whistleblowing reporting mechanism accessible to all employees for raising concerns or suspicions of misconduct, including modern slavery or human trafficking. The Standard outlines the steps Biocair will take to safeguard and protect employees who report concerns related to modern slavery or human trafficking, ensuring a safe and secure process for reporting.

- Following our commitment to extend this facility to all third parties, we made this facility accessible via the Biocair corporate website in Q2 2024. We plan to highlight this further with an awareness raising campaign in 2025.
- The Biocair **Employee Assistance Programme (EAP)** offers a confidential telephone support service, enabling employees to seek advice and information on a variety of topics, including concerns or suspicions regarding modern slavery and human trafficking. This service provides employees with a crucial resource to address any potential issues in a confidential and supportive environment.

## PARTS OF THE SUPPLY CHAIN WHERE THERE IS A RISK OF MODERN SLAVERY AND HUMAN TRAFFICKING

Biocair's global network spans over 170 countries, delivering fully GDP-compliant life sciences supply chain management solutions to customers worldwide.

The company collaborates with logistics subcontractors in 108 countries. In alignment with its commitment to responsible business practices, Biocair has assessed the potential risk of modern slavery within these operations, leveraging data from the 2024 Global Slavery Index to inform this evaluation. This proactive approach ensures that Biocair remains vigilant in identifying and addressing any risks related to modern slavery within its supply chain.

Region	Number of countries	Number of suppliers	Estimated prevalence of modern slavery
Africa	19	68	5.2 per 1000 people
Americas	26	145	5.0 per 1000 people
Arab States	7	9	10.1 per 1000 people
APAC	21	65	6.8 per 1000 people
Central Asia & Europe	34	259	6.9 per 1000 people

Using this assessment, Biocair will prioritize sub-contractors in the three highest risk regions: Central Asia, APAC and the Arab States for increased due diligence checks in relation to modern slavery and human rights.<sup>1</sup>

## EMPLOYEES AND OTHER INDIVIDUALS WE DEAL WITH

In 2024, Biocair maintained a global presence, with employees based in Belgium, China, France, Germany, India, the Netherlands, Singapore, South Africa, the United Kingdom, and the United States.

Globally, Biocair employs more than 520 individuals, the majority (89%) holding permanent employment contracts that adhere to all relevant local legislation. Additionally, 47 employees are engaged on fixed-term contracts. And 10 employees in the UK are casual workers.

Wages are processed electronically and deposited directly into employees' bank accounts, ensuring efficiency and transparency.

In the United Kingdom, Biocair strictly adheres to Home Office guidelines by requiring all new hires to provide valid Right to Work documentation before onboarding. Furthermore, Biocair fully complies with the statutory requirements of both the National Minimum Wage and the

<sup>1</sup> Global Slavery Index 2024 <https://www.walkfree.org/>

National Living Wage, demonstrating its commitment to fair and lawful employment practices.

## STEPS TAKEN TO ASSESS AND MANAGE THE RISK OF SLAVERY AND HUMAN TRAFFICKING IN THE SUPPLY CHAIN

### RISK ASSESSMENT

In 2024, Biocair conducted a comprehensive Duty of Care Risk Assessment, updating the assessment conducted in 2022. This assessment covered Biocair operations (Tier 0) and sub-contracted delivery services (Tier 1). The assessment focused on the following critical issues:

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| <ul style="list-style-type: none"><li>• Forced labour.</li><li>• Child labour</li><li>• Non-compliance with international labour standards for migrant workers</li><li>• Excessive use of precarious employment contracts</li><li>• Undeclared work and identity theft</li><li>• Discrimination in equal opportunities.</li><li>• Harassment and abuse</li></ul> | <ul style="list-style-type: none"><li>• Restrictions on freedom of association</li><li>• Excessive working hours</li><li>• Unfair wages</li><li>• Inadequate social benefits or social security</li><li>• Unsafe or inadequate working environment</li><li>• Occupational health &amp; safety risks (incl. psycho-social risks)</li></ul> |
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#### Tier 0: Biocair's Own Employees

While Biocair identified that many of these risks could potentially arise within its own operations, the company's well-developed mitigating policies and procedures have significantly reduced the likelihood of occurrence. The overall net risk vulnerability across these risks was assessed as **moderate**.

Despite this, Biocair remains committed to continuous improvement. Specific areas highlighted for ongoing monitoring and enhancement include:

- **Equal opportunities and discrimination:** Net risk score of 5/10
- **Harassment and abuse:** Net risk score of 5/10
- **Occupational health and safety:** Net risk score of 5/10

Regular reviews will ensure the efficacy and implementation of policies in these key areas. Biocair. The next review of the risk scores will be conducted in 2026, in line with Biocair's biennial review cycle.

#### Tier 1: Sub-Contracted Delivery Services

In assessing its sub-contracted delivery services, Biocair identified a higher level of risk due to limited oversight of sub-contractors' mitigating policies and procedures. The net risk vulnerability for this tier was assessed as **major**.

Biocair recognizes that the greatest exposure to risks of slavery and human trafficking lies in the use of sub-contracted delivery services, particularly in high-risk countries. Addressing these risks is a priority, ensuring supplier practices align with Biocair's ethical standards.

Specific areas highlighted are:

- **Forced labour** Net Risk score of 7/10
- **Non-compliance with international labour standards for migrant workers.** Net Risk score of 6.5/10
- **Restrictions on freedom of association** Net Risk score of 6.5/10

- Occupational health & safety risks (incl. psycho-social risks) Net Risk score of 6/10

## TRAINING AND AWARENESS

### TRAINING

Biocair is dedicated to empowering its employees with the knowledge and tools needed to identify and address modern slavery risks, no matter where they encounter them.

Building on the success of its initial **Modern Slavery Awareness eLearning module**, Biocair introduced **updated and territory-specific training** to employees across the UK, US, Belgium, Germany, France, the Netherlands, and South Africa. This training was also delivered to all members of the **Executive Leadership Team (ELT)** and the **Senior Management Team (SMT)**, ensuring alignment and accountability at all organizational levels.

The enhanced modules provided:

- A **comprehensive overview** of modern slavery risks and global and local statistics.
- **Insights** into the prevalence of modern slavery in different regions.
- **Practical guidance** on identifying warning signs of modern slavery.
- **Clear and actionable steps** for reporting concerns safely and effectively.

By tailoring training to specific regions, Biocair ensures its employees are equipped to navigate the unique social and legal contexts of their operational environments, reinforcing the company's global commitment to ethical practices.

### TRAINING COMPLETIONS

Training	Number of Employees Completed	Training Hours
Modern Slavery E-learning (EU)	50	12.5
Modern Slavery E-learning (UK)	180	45
Modern Slavery E-learning (US)	165	41.3
Modern Slaver E-learning (SA)	41	10.3
Total	436	109.1

In 2026, we will be working on India-specific and China-specific Modern Slavery e-learning for our colleagues in those regions.

### TOOLKIT

To support the Modern Slavery Awareness e-Learning module, the MILCO (Market Integrity Local Compliance Officer) developed a Modern Slavery and Human Trafficking toolkit, which was made available to employees via the Biocair Intranet. The kit contains:

- a poster for communal areas on spotting the signs of slavery and human trafficking.
- a poster for private areas on how to seek support or report suspected trafficking (Whistleblowing)
- a video presentation explaining the issues and offering guidance on how to spot the signs and report concerns.



## THIRD PARTIES

Biocair has not engaged with external third parties (suppliers) on modern slavery and human trafficking but recognizes that as part of the **Procurement and Responsible Business** review and the rollout of the Whistleblowing online platform to external third parties, there will be opportunities and a requirement to engage and support suppliers.

## OUR GLOBAL REACH

Biocair provides global services by establishing itself in key locations across 170 countries with Centers of Excellence in Europe, North America, Asia and Africa.

Each center is supported by carefully selected and managed service partners. Biocair's service partners are extensively practiced and subject to periodic audits, consistently ensuring the highest quality supply chain.

