Ortho UK's Modern Slavery Act Statement

This Statement sets out the steps that Ortho Clinical Diagnostics ("Ortho") has taken during the financial year ending 1 January 2020 in order to reduce the risk of slavery and human trafficking in its business and supply chain. It also sets out the currently planned activities Ortho intends to take for the current financial year.

Introduction

We recognise that slavery, servitude, forced/compulsory labour and human trafficking ("Modern Slavery") is a global and growing problem. We are committed to understanding and identifying Modern Slavery risks and will work to ensure that our business and supply chain is free from Modern Slavery.

Our structure, business and supply chains

We are a leading global provider of in vitro diagnostics. We have an established track record for providing high-quality products and services to the global clinical laboratory and immunohaematology communities.

We have customers in 125 countries and territories and have approximately 4500 employees worldwide.

Due to the diverse nature of our manufactured products and markets served, we also have a complex and geographically broad range of suppliers of raw materials, goods and services into our business.

Policies and contractual arrangements

Ortho promotes honest, ethical and lawful conduct in our business. Our Code of Conduct is central to achieving these goals. The Code of Conduct applies to all employees, independent consultants and outsourced service providers. There is a strong emphasis in the Code of Conduct on compliance with laws, the ethical and responsible conduct of our workforce and on building and maintaining strong relationships with ethical suppliers and distributors. Any reported violations of the Code of Conduct will be investigated and appropriate action taken.

Ethical and lawful conduct is also a keystone of our dealings with service providers and suppliers. Ortho therefore incorporates the Code of Conduct into its contract templates with outsourced service providers and suppliers. The contractual provision contained in our standard terms, such as obligations to comply with all applicable laws and regulations and rights to inspect supplier sites, support lawful and ethical behaviour.
The Code of Conduct also encourages our workforce to speak up about unethical or illegal conduct. In particular, we have a confidential ethics hotline available to employees and third parties to report any ethics-related conduct. This is one of the ways in which our workforce can raise concerns regarding Modern Slavery in our business or supply chains.

We have revised and updated our Dignity at Work and Diversity policies and in 2019, commenced a training programme for our workforce relating to professional and ethical behavior in the workplace. This will continue throughout 2020.

Employment

We recognise that employee due diligence helps to protect against hiring abusive individuals and to safeguard against human trafficking and individuals being forced to work against their will. We conduct an appropriate level of due diligence on our prospective employees (for example, checking an individual’s identification and right to work in the country in which they will be employed and references from any previous employers).

Our Reward philosophy is to have a compensation strategy that is competitive, fair and equitable for our employees, with the ultimate goal being to continue to attract and retain key talent. Our HR department conducts compensation surveys in line with this.

We also conduct periodic employee engagement surveys to understand how our workforce feels about working at Ortho.

Supply Chains

As our supply chain operates across industries, sectors and countries, there will inevitably be a significant variation in the levels of risk across the supply chain in terms of Modern Slavery.

We currently undertake third party due diligence, where appropriate, before contracting with potential suppliers, service providers, distributors and similar intermediaries.

Audits ranging from desk-top to full business reviews are undertaken with our existing suppliers. We have also updated our Supplier assessment and Supplier audit documentation to further reduce the risk of Modern Slavery in our business and supply chain and the responses are tracked.

Training and awareness

Ortho recognises that the knowledge and conduct of our employees plays an important role in mitigating the risk of slavery and human trafficking within our organisation. Our workforce is made aware of our Modern Slavery statement and additional awareness is provided to those people who are involved in contracting and working with suppliers so that they can understand, identify and address Modern Slavery risk.
This statement was approved by Ortho’s UK Business Unit Leaders and signed on their behalf by

Chad Dale
Chief Operating Officer

27 January 2020