

## **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 2017 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 immunohematology communities.

We have a direct presence in approximately 40 countries and an indirect presence in at least 142 countries and have approximately 4200 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 provisions 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.

During the course of this year 2017 we will review the Code of Conduct and related policies and will consider whether amendments are necessary to further reduce the risk of Modern Slavery in our business and supply chain.

### **Due diligence processes**

#### *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 prior to their joining the business (for example, checking an individual's identification and right to work in the country in which they will be employed). HR conducts compensation surveys and Ortho targets our compensation plan to be consistent with our peer companies.

### 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 (which includes know-your-customer checks), where appropriate, before contracting with potential suppliers, service providers, distributors and similar intermediaries.

Furthermore, in order to better understand the risk that Modern Slavery poses to our business and supply chain, we intend to undertake an assessment of our supply chain this year and will take appropriate action based on the assessment findings.

### **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. Therefore, we will review the need for specific Modern Slavery Act training and/or other awareness raising measures to help our employees understand, identify and address Modern Slavery risk.

This statement was approved by Ortho's Business Unit Leader UK, Head of Global Supply Chain and Head of Global Operations, and signed on their behalf by



Chad Dale

Head of Global Operations

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