

Biocomposites' Modern Slavery & Human Trafficking Statement 2019

This statement constitutes our group of companies' (Biocomposites Ltd, Biocomposites Inc. and Biocomposites (Shanghai) Ltd) statement in regard to modern slavery and human trafficking.

Biocomposites is a company that is highly regulated due to the type of products it supplies, this therefore makes Biocomposites subject to various complex laws, rules and regulations. In turn Biocomposites expects that any suppliers that are within its supply chain maintain similar high standards, including the adherence and adoption of business practices that assist in preventing and eliminating modern slavery and human trafficking from taking place in their onward supply chains.

About Biocomposites

Biocomposites is a privately-owned company that manufactures and sells directly or through distributors medical devices for use in orthopaedics and infection management; our product range consists of synthetic void fillers, suture anchors and screws.

Biocomposites has a single manufacturing site which is located in the Keele, Staffordshire in the United Kingdom.

Our Supply Chains

Biocomposites receives supplies from companies located in the United States, Switzerland, the United Kingdom, Ireland, Germany, France and the Netherlands.

Biocomposites has not become aware of any instances of modern slavery within its supply chain nor is there any indication that Biocomposites' suppliers in the above noted countries are vulnerable to such risks. Nor is Biocomposites aware, within its supply chain, of any instances where below minimum salaries are paid to workers or substandard working conditions exist.

Relevant Policies

Biocomposites has implemented and will continue to implement effective systems and controls to ensure that no instance of modern slavery and human trafficking is taking place anywhere within its supply chains which includes Biocomposites' Ethical Code of Conduct that applies to its employees, directors and interested parties in the execution of their duties.

Biocomposites' Ethical Code of Conduct makes it clear to its employees the high standard and behaviour it expects when employees are representing Biocomposites. The policy requires employees to report any actual or suspected unlawful activity or violation, which would include the Modern Slavery Act 2015.

Biocomposites will fully investigate all alleged breaches of its Ethical Code of Conduct, and will take a zero-tolerance stance if an actual breach is identified.

Biocomposites will always strive to act in an ethical manner and with integrity in regard to its commercial relationships and expects the companies that it works with act in a similar manner.

Registered Office

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Registered in England and Wales: 03291943

Risk Management and Compliance

Biocomposites sources the majority of its goods from organisations located in the EU, United States and the United Kingdom. According to the Global Slavery Index¹ these countries have a very low prevalence of modern slavery, it is estimated that around 0.2% of the population in these territories are living in modern slavery.

However, Biocomposites takes its compliance with the Modern Slavery Act 2015 very seriously. Biocomposites will not tolerate any instances of modern slavery and human trafficking within its supply chain. If evidence is found that one of Biocomposites' suppliers is involved in such practices it will fully investigate any allegations of modern slavery; Biocomposites will terminate its relationship with any supplier if incidents of modern slavery are not resolved to its satisfaction.

Training and Performance Indicators

As outlined above Biocomposites' exposure to modern slavery is limited, therefore it has not implemented any specific training or key performance indicators in relation to modern slavery or human trafficking in the previous financial year.

Nonetheless, its employees are informed and must adhere to Biocomposites' Ethical Code of Conduct and adherence is monitored.

Sign-off

This statement is hereby made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Biocomposites' modern slavery and human trafficking statement for the financial year commencing the 1st of January 2019 to the 31st of December 2019.

Michael Harris

Name: Mike Harris

Title: CEO

Date: *May 2nd 2019*

[1] <https://www.globalslaveryindex.org/2018/data/maps/>