Modern Slavery and Human Trafficking Statement
Financial Year 1st July 2018 – 30th June 2019

Introduction

Modern Slavery is a criminal offence under the Modern Slavery Act 2015. CSL Behring (UK) Limited (“CSL Behring UK”) is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices. This policy statement sets out the actions the Company takes to ensure that there is no slavery or human trafficking within the CSL Behring UK business and our supply chains. It also sets out the standards of behaviour expected of all our employees, contractors, suppliers and distributors.

CSL Behring UK Limited – Our Business

CSL Behring is a global leader in the protein biotherapies industry. We research, develop, manufacture and market biotherapies, which are used to treat serious and rare conditions. Users of our therapies rely on them for their quality of life and, in many cases, for life itself. Our commitment to improving the quality of life for those who use our therapies is evident in everything we do. Whether we are manufacturing and marketing effective products or researching and developing innovative biotherapies, we are first and foremost focused on fulfilling our customers’ needs.

The CSL Behring UK office is located in Haywards Heath, West Sussex where we employ over 40 people.

Human Trafficking and Slavery Risk in the context of CSL Behring UK Limited business:

CSL Behring UK has a zero-tolerance approach to human trafficking and slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to enforcing effective systems and controls which ensure human trafficking and slavery is not taking place anywhere in our business or those of our Suppliers. We expect everyone working with us or on our behalf to uphold and support the measures set out in this Policy Statement to safeguard against Modern Slavery.
Employees

All employees of CSL Behring UK Limited work under individual employment agreements and in all cases these agreements remunerate significantly above minimum wage. For employment to proceed, all candidates must provide applicable proof of eligibility to work in the United Kingdom in line with the guidance issued by the government of the United Kingdom.

Contractors

Whilst significant numbers of Contractors or Agency staff are not engaged by the Company, all such workers are treated fairly, equally and broadly in line with our permanent employees.

Supply Chain

CSL Behring UK will only work with reputable Suppliers who share our values and commit to working to the high standards we set for ourselves. To ensure those in our supply chain comply with our standards and values, we have a supply chain risk assessment procedure in place. These risk assessments set out our required standards of operating and also gain a thorough understanding of the measures our Supplier takes to ensure that slavery and human trafficking is not occurring in their own business and supply chain. We have contractual provisions for our Suppliers to confirm their adherence to this policy and to accept our right to audit their activities both routinely or where there may be a question mark about their compliance (see also Managing Risk below).

Managing Risk

CSL Behring UK has no cause to suspect that Modern Slavery or Human Trafficking is currently present within its business or supply chain, nor evidence that it has been in the past. However, in order to mitigate the risks of Modern Day Slavery, CSL Behring UK has the following safeguards in place:

- Code of Responsible Business Practice - CSL Behring UK operates under the CSL Group Code of Responsible Business Practice which sets out the high standards of behaviours expected of all employees and contractors, which include standards of operation under Modern Slavery legislation.
- Whistle Blowing - The CSL Group Whistle Blowing Policy obliges employees and contractors to report unethical or illegal activity.
• Training - to ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all employees and contractors to review and confirm understanding of this Policy Statement on Modern Slavery and Human Trafficking. We also undertake training on associated policies to give a wider perspective on the issues involved with Modern Slavery, including the Company Whistleblowing policy, the Company Code of Responsible Business Practice, Equal Opportunities and Diversity Policy and Bullying and Harassment Policy.

• CSL Behring UK will ensure that the implementation and ongoing compliance with this statement is the responsibility of the CSL Behring UK Board of Directors and Leadership team.

• Suppliers – as well as appropriate due diligence when engaging a new Supplier, upon request, our current Suppliers must be able to demonstrate compliance with this Policy Statement to the reasonable satisfaction of CSL Behring UK. CSL Behring UK may perform periodic audits on this Statement and Suppliers are expected to fully co-operate with any such audits.

• CSL Behring UK will take prompt action against any Supplier who is found to be in breach of the terms contained within this Policy Statement, which may include terminating any supply agreement, arrangement or other contract with that Supplier. It shall also take such other (remedial) steps as the CSL Behring UK Board of Directors shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

• Employees, Suppliers and Customers are encouraged to report any concerns or suspicions they have regarding unlawful conduct, including slavery or human trafficking within the CSL Behring UK business.

This Modern Slavery and Human Trafficking Statement has been approved by the CSL Behring UK Board of Directors on 30th June 2018 in accordance with the requirements of Section 54(1) of the Modern Slavery Act 2015 and will be regularly reviewed and updated as necessary. The CSL Behring UK Limited Board of Directors endorse this policy statement and is fully committed to its implementation.

Edward Owens
Executive Director, General Manager UK & Ireland

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