

Modern Slavery Policy

1. About this policy

1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. SBFM has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or supply chains.

1.2. SBFM is committed to ensuring that there is transparency in our own business and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. SBFM expects the same high standards from all contractors, suppliers and other business partners, and as part of our contracting processes, SBFM includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that our suppliers will hold their own suppliers to the same high standards.

2. Who this policy applies to

2.1. This policy applies to all persons working for SBFM or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. Responsibility for the Policy

3.1. SBFM Limited's board of directors has overall responsibility for ensuring this policy complies with SBFM's legal and ethical obligations, and that all those under our control comply with it, but has delegated responsibility for overseeing its implementation to the Head of the HR. Suggestions for change should be reported to the Head of the HR.

3.2. The HR Department has day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.

3.3. This policy is reviewed annually by the Head of the HR.

4. Compliance with the Policy

4.1. All stakeholders must ensure they have read, understand and comply with this policy.

4.2. The prevention, detection and reporting of modern slavery in any part of SBFM or its supply chains is the responsibility of all those working for SBFM or under its control. All stakeholders are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3. All stakeholders must notify their manager (if you are a colleague of SBFM) or the HR Department as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

4.4. SBFM Ltd utilise their partnership with Unseen, an anti-slavery charity. Whistleblowing and/or confidential reporting can be made on the modern slavery & exploitation helpline 08000 121 700.

4.5. SBFM encourages all stakeholders to raise concerns about any issue or suspicion of modern slavery in any parts of its business or supply chains of any supplier tier at the earliest possible stage.

4.6. If there is a believed or suspected breach of this policy or that it may occur, you must notify your manager or the HR Department as soon as possible.

4.7. If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier SBFM's supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the HR Department.

4.8. SBFM aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. SBFM is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any stakeholder believes they have suffered any such treatment, they should inform the HR Department immediately. If the matter is not remedied, (and you are a colleague), this should be raised formally using the SBFM Grievance Procedure.

5. Communication and Awareness of this Policy

5.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all office based colleagues and operational managers who work for SBFM and regular training is to be provided as necessary. A copy of this policy is available on our intranet or on request from the HR Department.

5.2. SBFM's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this Policy

6.1. Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2. SBFM may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

6.3. This policy does not form part of any colleague's contract of employment and we may amend it at any time

7. Due diligence process

7.1. SBFM Ltd will proactively monitor and visit sites, while sample-based validation of

documents and Right to Work checks will be made. This will be driven by the QHSE division in conjunction with Human Resources. Any incidents will be reported centrally.

Unseen (independent modern slavery charity)

Helpline: 08000 121 700

Website: www.modernslaveryhelpline.org