

## ETHICAL LABOUR AND ANTI-HUMAN TRAFFICKING POLICY

### 1. STATEMENT OF POLICY

Cellmark is committed to conducting business in compliance with all applicable laws and regulations including, but not limited to, the UK Modern Slavery Act 2015.

In conducting our business we will not tolerate human trafficking, forced labour, unlawful child labour, commercial sex acts, or other unethical or illegal labour practices by our employees, agents, and subcontractors or anywhere in our supply chain. We will not charge our employees recruitment fees or use recruiters that charge recruitment fees.

This policy applies to all of our employees, subcontractors, subcontractor employees and agents. Any employee or subcontractor who is found to have contravened this policy will be subject to remedial action: if an employee, this will involve disciplinary action including the possibility of dismissal; if a subcontractor or agent, action will include contract termination. If we believe that there has been an unlawful act we will refer the matter to the police.

### 2. DEFINITIONS

- **Commercial Sex Act:** Any sex act for which anything of value is given to or received by any person.
- **Forced labour:** Knowingly providing or obtaining the work, labour, or services of a person under threat or penalty, where the person has not offered himself or herself voluntarily. Such threats include threats of harm to, or physical restraint against, that person or another person. Forced Labour also includes debt bondage and involuntary servitude.
- **Human Trafficking:** Recruitment, transportation, transfer, harbouring, or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation, including sexual exploitation, sex trafficking, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
- **Unlawful Child Labour:** Labour that jeopardizes the physical, mental, or moral well-being of a child, either because of its nature or because of the conditions in which it is carried out; or work that deprives children of their childhood or education, their potential and their dignity, and that is harmful to physical and mental development; or the sale and trafficking of children and their entrapment in bonded and forced labour.

### 3. REPORTING

Employees are required to report any activity suspected to involve Human Trafficking, Forced Labour, Unlawful Child Labour, or Commercial Sex Acts or any activity inconsistent with this Policy or applicable laws committed against themselves or others, including any contracted staff. Employees may report suspected activity without fear of retaliation directly to their line manager or supervisor, a member of the HR department, Cellmark's Quality Director, or any member of the Executive Management Team.

The UK Modern Slavery Act 2015: <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>