



Modern Slavery	Policy	Document Ref. FQAPO055
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Modern Slavery is a criminal offence under the UK Modern Slavery Act 2015. Modern slavery is a crime and violation of fundamental human rights. It takes various forms such as slavery, forced and compulsory or bonded labour, human trafficking, servitude and child labour but is not limited to just these practices, all of which deprive one person of their liberty by another person in order to exploit them for commercial or personal gain.

Baxters has a zero-tolerance approach to modern slavery in all its forms and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure insofar as possible modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Baxters is also committed to ensuring there is transparency in our own business and in our approach to dealing with modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all our suppliers, contractors and other trading partners and prohibit the use of all forms of modern slavery whether adults or children and expect our trading partners to hold their own suppliers to the same high standards.

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

Responsibility for this Policy

Ultimate responsibility for this policy lies with Baxters Senior Management. The European Ethical Steering Committee have responsibility for ensuring this policy complies with our legal and ethical obligations and is trained and implemented across the Baxters European business

Compliance with this Policy

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that may lead to a breach of this policy.
- You must contact your manager as soon as possible if you believe or suspect that a conflict with this policy has taken place or believe may take place in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery taking place in any part of our business or in our supply chains at any tier at the earliest stage possible with the Fochabers Site Director, a senior member of the purchasing team or your manager.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery please raise it with the Fochabers Site Director. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken and ensure that no-one suffers detrimental treatment as a result of reporting in good faith.

Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery on its own sites and in its supply chains, forms part of the induction process for all individuals who work for us and training will be provided as necessary thereafter.

Our zero-tolerance approach to modern slavery will be communicated to all employees, suppliers, contractors and trading partners at the outset of our business relationship and will be reinforced as appropriate thereafter.

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Breach of policy

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

We may terminate our relationship with any other individuals and business organisations working on our behalf if they breach this policy.

Signed:

Position: European Chief Executive Officer

Date: 25/10/18

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