

Biocomposites' Modern Slavery & Human Trafficking Statement 2021

This statement constitutes our group of companies' (Biocomposites Ltd., Biocomposites Inc., Biocomposites (Shanghai) Ltd. and Biocomposites India Pvt. 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. Our products make Biocomposites subject to various complex laws, rules and regulations, to which Biocomposites is complaint. In turn, Biocomposites expects any suppliers that are within its supply chain to 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 orthopaedic and infection management. Our product range consists of synthetic void fillers, suture anchors and screws.

Biocomposites' manufacturing sites are in Keele, Staffordshire, which is based 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. Neither is there any indication that Biocomposites' suppliers in the above noted countries are vulnerable to such risks. Also, Biocomposites is not aware, 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 the 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 Code 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 regarding its commercial relationships and expects the companies that it works with act in a similar

manner.

Risk Management and Compliance

Biocomposites sources most of its goods from organisations located in the European Union, United States and the United Kingdom. It is estimated that approximately 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 and will not tolerate any instances of modern slavery and/or human trafficking within its supply chain. If evidence is found that one of Biocomposites' suppliers is involved in such practices,

Biocomposites will fully investigate the findings and terminate contractual agreements with any supplier found to be guilty of modern slavery and/or human trafficking.

Training and Performance Indicators

As outlined above Biocomposites' exposure to modern slavery is limited. Therefore, specific training or key performance indicators in relation to modern slavery and human

trafficking is not a current requirement within the company. Nonetheless, all employees are informed of their duty to 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 January 2020 to the 31st December 2020.

Name: Michael Harris

Michael Rams

Title: CEO

Date: 13th April 2021

Registered in England and Wales: 03291943