### **NEOGEN EUROPE MODERN SLAVERY STATEMENT**

### 1: OPENING STATEMENT FROM SENIOR MANAGEMENT

NEOGEN Europe Ltd and its subsidiary companies (the Group) is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers. The Group does not, and will not in future, support or do business knowingly with any other party involved in any act of slavery, human trafficking, forced, bonded or child labour as defined in the Modern Slavery Laws.

### 2: STRUCTURE OF THE ORGANISATION

NEOGEN Europe Ltd, the European subsidiary of NEOGEN Corporation, is a high technology business dedicated to the development and marketing of novel diagnostic kits. These kits focus on topical concerns about the quality and safety of food and agricultural products. NEOGEN Corporation is headquartered in Lansing, Michigan and has grown to more than 2,000 employees in multiple U.S. and international locations and has a worldwide presence.

The Group employs over 350 people across five UK sites and two in Europe; one in Ireland and another in Italy. Additionally, the Group has a small remote workforce based in France, Germany, Netherlands, Hungary & Spain. The Company has four subsidiaries; Quat-Chem Ltd, Delf (UK) Ltd, Abbott Analytical Ltd, and NEOGEN Italia SRL and also manages the operations of Megazyme Ltd on behalf of Neogen Corporation. The Group conducts business in Europe, the Middle East, India, Africa and to a lesser extent, China.

The Modern Slavery Act 2015 states that all organisations must produce a statement once their turnover reaches a certain level. To find out more about the nature of our business, please visit <a href="http://www.neogen.com/">http://www.neogen.com/</a>

In order to provide products to ensure the safety of food, animals, and plants we work with a range of suppliers who provide us with raw materials, packaging materials, components, technical products, and services. The Group procures goods and services from over 2,000 suppliers across 49 countries. Of this, we purchase 95% from suppliers based in EU countries, 4% from suppliers in OECD countries outside of the EU and the remaining 1% from non-OECD countries outside the EU.

## 3: POLICIES

As part of our commitment to combating modern slavery, we have implemented an Anti-Slavery Policy. We also have procedures in place for the initial approval of supplier requests with key requests being reviewed by our Quality Department.

Utilizing NEOGEN's supplier questionnaire and terms and conditions, we also make sure our suppliers are aware of our policies which requires them to adhere to the same high standards.

We also operate a Whistle-blower Policy aimed at employees which encourages staff to report any wrongdoing.

These policies have been developed by in conjunction with our Group Finance Director, Quality and Compliance team, procurement team, human resources and with legal advice.

## 4: DUE DILIGENCE

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures; we have identified suppliers in high risk countries and/or high risk sectors for modern slavery occurring and are in the process of ensuring that they comply to Modern Slavery laws and confirm, as far as possible, that they will adhere to the principles of our Anti-Slavery Policy . This work has been reduced in our current financial year due to pressures associated with the COVID-19 pandemic.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- stay abreast of potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

## **5: RISK AND COMPLIANCE**

The Group has conducted an evaluation of the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. We will play close attention to suppliers in India and China, which, according to the Global Slavery Index, have the highest absolute numbers of people in modern slavery, followed by suppliers in Morocco, Kenya, UAE, Taiwan and Hong Kong. Through NEOGEN's supplier questionnaire process, suppliers in these countries are made aware of the principles of Modern Slavery laws and agree to comply with our Policy. We will request copies of their policies and procedures.

We do not consider that we operate in high-risk sectors or locations because we employ the large majority of all our staff directly within the UK or EU and carry out strict right to work checks. Furthermore, we employ a generally skilled workforce, and the nature of our business activities are low risk.

Where we have identified a potential risk, for example where we employ contract cleaning staff or use agency workers, we will require these suppliers to demonstrate that modern slavery does not occur.

In order to ensure our suppliers adhere to our anti-slavery policy, we have introduced formalised procurement terms and conditions to include a modern slavery clause. We do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies, we will immediately seek to review our relationship with the relevant supplier.

# **6: TRAINING**

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our comprehensive Anti-Slavery Policy, employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Through the Policy, employees are made aware of the benefits of stringent measures to combat slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Through Policy communication, and an IOSH & IIRSM accredited training video, all staff are provided with awareness.

# 7: FURTHER ACTIONS AND SIGN-OFF

Efforts to further advance our efforts combat modern slavery and enhance our processes have been limited in our financial year 1 June 2020 and ending 31 May 2021 following the continued impact of the global COVID-19 pandemic. However, over the last year we have introduced formalised supplier terms & conditions for new suppliers which includes a specific modern slavery clause and requires acknowledgement of our Anti-Slavery Policy. We are currently updating our terms and conditions for existing approved suppliers and once complete, this will be issued to all existing suppliers. We will also extend this to distributors of our products to include a clause which covers any future changes to their supply chains. Amongst other things, this will require them to acknowledge and confirm they will comply with our Anti-Slavery Policy and Ethical Trading Policy. We have also undertaken a revised training programme for all employees and recommunicated our existing Anti-Slavery Policy. We will continue to review our processes to prevent slavery or human trafficking from occurring in our business or supply chains over the following financial year.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year commencing 1 June 2020 and ending 31 May 2021.

This statement was approved by the Board on

Signature:

Steven Donnachie Group Finance Director

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Date: 15 December 2021