



## Modern Slavery and Human Trafficking Statement 2018

### 1. Introduction

Blue Earth Diagnostics is publishing this statement in accordance with the Modern Slavery Act 2015 (The Act). Section 54 (1) of The Act requires businesses with an annual turnover of more than £36m to publish an annual statement confirming the steps they have taken to ensure that slavery, servitude, forced labour and human trafficking have not been taking place in the business or in its supply chain. Blue Earth Diagnostics met this reporting requirement during the financial year 2017/18 and this is the company's first Modern Slavery and Human Trafficking Statement.

Blue Earth Diagnostics is committed to operating to the highest ethical standards, so we welcome the Modern Slavery Act 2015 and we are committed to its principles of abolishing all forms of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating a respectful work place environment free from discrimination for all our staff and we will not allow modern slavery or human trafficking anywhere in our business.

We also expect all elements of our supply chain to operate to the same standards, so we will not trade or partner with any business or organisation involved in modern slavery and human trafficking, either directly or indirectly, and we will only engage with suppliers or contractors who confirm their compliance with the principles of The Act.

### 2. Blue Earth Diagnostics Business

Blue Earth Diagnostics was formed in 2014. The company's founding investor is Syncona Limited, an investment company aligned with two of the UK's premium charitable funders in life science, the Wellcome Trust, original founder of Syncona's life science division, and Cancer Research UK.

Blue Earth Diagnostics (BED) has established its global headquarters in Oxford in the United Kingdom and has a wholly owned subsidiary BED Inc. based in Burlington, MA, USA. The company's mission is to transform the clinical management of patients with cancer by developing and delivering innovative molecular imaging technologies to address unmet clinical needs, and reliably inform diagnosis and treatment decisions. BED is the marketing authorisation holder in USA and Europe of one radiopharmaceutical product, Axumin™

Blue Earth Diagnostics employs over sixty people in the UK and the USA.

### 3. Blue Earth Diagnostics' Supply Chain

#### Manufactured Goods

Currently, the manufacture and storage of raw materials, and the manufacture and distribution of the finished product to hospitals and clinics are all carried out exclusively in the European Union, the European Economic Area and the United States.

All manufacturing and distribution operations are outsourced to third parties.

Blue Earth Diagnostics anticipates that, in the future, the finished product may be manufactured in a number of other countries outside the current territories.



## Business partnerships and business service providers

In the development of its products, Blue Earth Diagnostics works closely with a range of bodies, some of which are also suppliers. They include research bodies, universities, healthcare providers and pharmaceutical companies.

In addition, Blue Earth Diagnostics engages with a variety of suppliers of business services, which include:

- Distributors for finished product
- Information technology providers
- Clinical research organisations
- Marketing and public relations consultancy services
- Accountancy, audit and legal advisers
- Office maintenance, cleaning, catering and miscellaneous local services

## 4. Relevant Policies

The Introduction to the Staff Handbook states that “Blue Earth Diagnostics expects its employees to conduct their business in an ethical and compliant manner”. It goes on to state that employees are expected to be mindful of their obligations under the Modern Slavery Act 2015 and not be active or complicit in allowing slavery, servitude, forced labour and human trafficking either within BED or in the supply chain.

There are a number of specific employment policies in the Staff Handbook that support the statement above and help to mitigate against the risk of modern slavery and human trafficking in Blue Earth Diagnostics’ core business. They are:

- Recruitment and Selection Policy
- Diversity and Equality Policy
- Dignity at Work Policy
- Anti-Fraud and Corruption Policy
- Whistleblowing Policy
- Disciplinary Policy

## 5. Due Diligence and Assessment of Risk

Hitherto there has been no formal due diligence or risk assessment of Blue Earth Diagnostics’ supply chain in relation to modern slavery and human trafficking.

In terms of risk considerations, the entire supply chain, both for manufactured goods and business services, is currently based in the UK, the European Union, the European Economic Area or the United States.

All elements of the supply chain are subject to the jurisdictions of their respective countries, all of which have taken action in some form against slavery, bonded labour and human trafficking.

In addition, Blue Earth Diagnostics operates in a highly technical and highly regulated area of the pharmaceutical marketplace, where product is painstakingly generated without the use of mass production methods by a workforce with a high level of education and individual responsibility.

Generally, therefore, the risks of modern slavery and human trafficking in the existing supply chain are low.

In the future, however, it is possible that Blue Earth Diagnostics will undertake elements of the manufacture of its finished product in countries, where the risk of modern slavery and human trafficking could be greater.

## 6. Position at 30<sup>th</sup> September 2018, Blue Earth Diagnostics' financial year end

We have produced our first Modern Slavery and Human Trafficking Statement.

We have studied the Modern Slavery Act 2015 and have audited our employment policies in the light of the requirements of The Act. We have amended relevant existing employment policies to include explicit reference to the obligations of Blue Earth Diagnostics' employees in relation to:

- Recruitment and Selection
- Diversity and Equality
- Dignity at Work
- Anti-Fraud and Corruption
- Whistleblowing
- Disciplinary Process

We are aware that there is no formal due diligence or risk assessment of the Blue Earth Diagnostics' supply chain currently in place in relation to modern slavery and human trafficking, although it is also clear that the risk in the current supply chain is extremely low.

In the light of our findings, above, we have drawn up an action plan for the financial year 2018/19, which we consider to be achievable and commensurate with the size of the business and reflects the level of risk both now and in the future.

## 7. Planned Activity for 2018/19

Having audited and amended our relevant existing policies, our objective in 2018/19 is to embed the principles of the Modern Slavery Act 2015 into the day to day activity of the workforce, both for the core business and for the supply chain, with a particular emphasis on possible additions to our manufacturing base in the future.

### Staff awareness training

The publication of our first statement brings with it a responsibility to ensure that employees of Blue Earth Diagnostics are made aware of their obligations under the Act and the actions they must take if they suspect that slavery or trafficking is occurring in the business or the supply chain. To that end we will undertake modern slavery and human trafficking awareness sessions for all our UK based employees during the 2018/19 financial year.

### Contracting with third parties

We will develop contract templates that include standard clauses around modern slavery and human trafficking for future contracts with third party suppliers. As existing contracts are renewed they will be updated with the language of the revised templates.

### Risk Management

During 2018/19 we will start to explore the implications under The Act of developing our supply chain into countries outside the European Union, European Economic Area and the United States of America.

This statement was approved by the Board of Directors on 13<sup>th</sup> December 2018.

For and on behalf of the Board of Directors:



Jonathan Allis  
Chief Executive Officer

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