

Miltenyi Group Anti-Slavery and Human Trafficking Policy

Purpose	Scope
<p>At the Miltenyi Group, we are committed to acting ethically and with integrity in all aspects of our operations. We have adopted an Anti-Slavery and Human Trafficking Policy which supports and outlines our dedication to preventing modern slavery and human trafficking in our business and supply chains. This policy defines the responsibilities of all employees and stakeholders in upholding these standards and details the measures we take to identify, mitigate, and address risks of exploitation.</p>	<p>The Miltenyi Group Anti-Slavery and Human Trafficking Policy intends to apply to all Miltenyi Group employees, contractors, suppliers, and business partners globally. It governs our operations, supply chain activities, and recruitment practices to ensure prevention of exploitation and human trafficking and, as applicable, compliance with the UK Modern Slavery Act 2015 and related ethical standards. The policy also includes mechanisms for reporting concerns and monitoring adherence to anti-slavery measures.</p>

Content

- 1. What is slavery? 3
- 2. Responsibilities 3
- 3. The risks..... 4
- 4. Our procedures 4
- 5. Identifying slavery 5
- 6. Reporting slavery 6
- 7. Monitoring our procedures..... 6
- 8. Status of this policy..... 6
- 9. Policy approval 7

1. What is slavery?

The UK Modern Slavery Act (MSA) 2015 covers four activities:

- (a) Slavery – Exercising powers of ownership over a person
- (b) Servitude – The obligation to provide services imposed by the use of coercion
- (c) Forced or compulsory labor – Work or services are exacted from a person under the menace of a penalty and for which the person has not offered themselves voluntarily
- (d) Human trafficking – Arranging or facilitating the travel of another person with a view to their exploitation

Modern slavery is a complex and multi-faceted crime. The MSA 2015 recognizes the important part businesses can and should play in tackling slavery and encourages them to do so.

With this in mind, we need to pay particular attention to:

- (a) our supply chain,
- (b) any outsourced activities, particularly to jurisdictions that may not have adequate safeguards, and
- (c) cleaning and catering suppliers.

2. Responsibilities

We encourage everyone within the Miltenyi Group to take the time to read and understand and observe our Anti-Slavery and Human Trafficking Policy and appreciate the importance of working with us on modern slavery and human trafficking.

The firm

We will employ reasonable measures to:

- (a) maintain policies and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation,
- (b) do what we can to reduce the potential for slavery and human trafficking when it comes to recruitment,
- (c) check and monitor our supply chains,
- (d) have in place an open and transparent grievance process for all staff,
- (e) seek to raise awareness so that our colleagues know what we are doing to promote appropriate welfare practices and how to report concerns about slavery and human trafficking, and
- (f) make a clear statement of the steps we are taking to combat the risk of slavery and human trafficking.

Managers

Managers will employ reasonable measures to:

- (a) remain alert to indicators of slavery,
- (b) raise the awareness of our colleagues, by discussing issues, so that everyone can spot the signs of trafficking and exploitation and know what to do, and
- (c) treat any concerns raised by colleagues about slavery and human trafficking either within the firm or in our supply chains with the utmost seriousness and act on them.

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, within the Miltenyi Group you must:

- (a) read and comply with this policy,
- (b) avoid any conduct which might lead to, or suggest, a breach of this policy,
- (c) keep your eyes and ears open – if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure,
- (d) follow our reporting procedure if a colleague tells you something you think might indicate he or she is or someone else is being exploited or ill-treated, and
- (e) tell us if you think there is more we can do to prevent people from being exploited. Our policy encourages openness and no one will suffer detrimental treatment for reporting a genuine concern about modern slavery, human trafficking, other breaches of law or unethical practices that he or she suspects are occurring.

3. The risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- (a) some components of our supply chain, and
- (b) temporary service staff.

4. Our procedures

We take our responsibility to root out modern slavery and human trafficking both within our business and in our supply chain very seriously. The core measures we as a firm are taking are:

Supply chain

We monitor our supply chain to mitigate the risk of slavery and human trafficking by conducting an annual risk assessment based on data from the ITUC Global Rights Index.

We tell the companies we do business with that we do not accept any form of exploitation; we have implemented concepts to commit them to our Code of Conduct (see [Miltenyi Biotec's Supplier Code of Conduct](#)).

We train our buyers on conducting supplier risk assessments, focusing on identifying high-risk industries and countries. This training equips buyers to classify suppliers as high-risk or low-risk and implement appropriate countermeasures accordingly.

We work to account for our supply processes – we know who is providing goods and services to us and we have mechanisms and processes in place to check, including reviewing our significant suppliers' identity and level of risk in this area, and making efforts to confirm their adherence to anti-slavery measures in their businesses.

Recruitment

Our HR department follows firm policy.

We verify staff are legally able to work in the relevant office.

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

5. Identifying slavery

We recognize that there is no typical victim and some may not realize they are being exploited. Key indicators include not possessing their own identification, being instructed by someone else, allowing others to speak for them, being dropped off and collected from work, appearing frightened or withdrawn, having restricted contact with friends or family, and limited social interaction. While these signs may suggest exploitation, they do not confirm it; if you suspect someone is a victim, report your concerns.

6. Reporting slavery

To support our commitment to ethical practices, and particularly also to prevent modern slavery and human trafficking, we've established a comprehensive Complaint Management System.

If you believe or suspect that a breach of this policy has occurred or that modern slavery or human trafficking may exist in a part of our business (or within our supply chains), then you should report your concern as soon as possible.

Internal: Employees can anonymously report concerns via our internal platform, ensuring all issues related to anti-slavery and human trafficking are addressed without fear of retaliation.

External: If your concern relates to the conduct of a supplier, then you should not make any direct accusations or approaches to the supplier yourself. You should act in accordance with the complaint procedure for raising concerns. Externally, our complaint procedure is embedded in the [Legal Notes page](#), under the Purchasing Terms and Conditions, offering an [anonymous form](#) and contact details for the [Human Rights Manager](#) to allow confidential reporting.

We will support all who raise genuine concerns in good faith under this policy. We are committed to ensuring that you do not suffer any detrimental treatment in any form as a result of raising genuine concerns in good faith under this policy.

If you are found to have acted in breach of this policy or contrary to its aims and objectives, then we may take disciplinary action against you up to and including termination of your employment. If you are not an employee, then we may terminate any other form of engagement you may have with us.

7. Monitoring our procedures

We will review our Anti-Slavery and Human Trafficking Policy regularly. We will ensure that information and/or training on any changes we make are implemented within the firm.

8. Status of this policy

This policy does not form part of any employee's contract of employment and may be updated and amended in our discretion from time to time. Even though the policy does not have contractual force, as with other policies within the firm, we expect all our employees and partners to comply with it in particular by attending training sessions and reporting any

concerns about suspected slavery and trafficking in our business, at our clients, or in our supply chains.

9. Policy approval

Version	Date	Approved by
1.0	30.05.2025	Dr. Boris Stoffel (Managing Director)