

GLOBAL ANTI-SLAVERY POLICY

Reference: GLAD-POL- 003

Version number: 1.0

Department: Global Legal Affairs Department

Written by	Reviewed by	Approved by
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Effective date: 29 July 2025		Review type: annual

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

3. Responsibilities

The Besins Healthcare Group, including our managers and colleagues, have responsibilities to ensure our fellow workers are safeguarded, and treated fairly and with dignity.

All employees of the Besins Healthcare Group must observe this Policy and be aware that ignoring the possibilities is a direct violation of this Policy.

Organization responsibilities

As an organization, we will:

- (a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- (b) be clear about our recruitment policy;
- (c) check our supply chains;
- (d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us;
- (e) ensure we have in place an open and transparent grievance process for all staff;
- (f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- (g) make a clear periodic (e.g., annual) statement identifying steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and demonstrating that we take our responsibilities to our employees and our clients seriously.

Manager responsibilities

Managers will:

- (a) listen and be approachable to colleagues on this Policy;
- (b) respond appropriately if they are informed of a situation that may indicate a colleague or any other person is in an exploitative situation;
- (c) remain alert to indicators of slavery (see Section 6 “Identifying human trafficking, slavery, and other forms of human exploitation”);
- (d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and

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- (e) use their experience and professional judgement to gauge situations.

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you are urged to:

- (a) Be alert: 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 (see Section 7 “Reporting slavery or other forms of human exploitation”);
- (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated; and
- (c) tell us if you think there is more we can do to prevent people from being exploited.

4. The risks

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

- (a) supply chain and service providers;
- (b) recruitment through agencies; and
- (c) general recruitment.

We manage these risk-areas through our procedures as set out in this policy.

5. Our procedures

(a) Anti-human trafficking/Anti-slavery statement

(i) We make a clear annual statement listing the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities seriously.

(ii) We make this statement on our website and through this Policy.

(iii) Our historic statements remain available on our website and internally on our SharePoint.

(iv) Our statement will cover:

(A) business model and supply chain relationships, if applicable.

(B) Audits and other verifications implemented with our Supply Chain and providers to ensure compliance with this Policy.

(b) Recruitment

(i) Using agencies

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- (A) Our Human Resources department follows this Policy and only uses agreed specified reputable recruitment agencies.
- (B) To ensure the potential for human trafficking or slavery is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - conducting background checks
 - investigating reputation
 - ensuring the staff an agency provides have the appropriate paperwork (e.g., work visas)
 - ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
 - we keep agents on the list under regular review, e.g. at least every three (3) years.
- (ii) General recruitment
 - (A) We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
 - (B) We always ensure staff are legally able to work in the country where they work.
 - (C) We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
 - (D) 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.
 - (E) If, through our recruitment process, we suspect someone is being exploited, the Human Resources Department will follow our reporting procedures (see Section 7 “Reporting human trafficking, slavery or other human exploitation”).

6. Identifying human trafficking, slavery and other forms of human exploitation

It is important to be aware that some victims do not understand they have been exploited and are entitled to help and support.

However, the following non exhaustive key signs could indicate that someone may be a slavery or trafficking victim:

- (a) the person is not in possession of their own passport, identification or travel documents;
- (b) the person is acting as though they are being instructed or coached by someone else;
- (c) they allow others to speak for them when spoken to directly;

- (d) they are dropped off at and collected from work;
- (e) the person is withdrawn or they appear frightened;
- (f) the person does not seem to be able to contact friends or family freely;
- (g) the person has limited social interaction or contact with people outside their immediate environment.

Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

7. Reporting human trafficking, slavery or other human exploitation

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial the appropriate emergency phone number of your country.

Otherwise, you should discuss your concerns with the Human Resources Department who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, you discuss your concerns first with the Human Resources Department before taking any further action.

If you feel that there is a systemic or major risk for Besins Healthcare or someone with regards to exploitation or abuse, you may contact the Compliance Officer: CorporateCompliance@besins-healthcare.com.

8. Non-retaliation policy

Besins does not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or external audit or investigation as per our Whistleblower Protection Policy (GLAD-POL-007). Any employee who engages in retaliation or threats of retaliation will face disciplinary action, including potential termination of employment.

9. Training

We provide specialist training to those staff members who are involved in managing recruitment and our supply chains. More general awareness training is provided to all staff.

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10. Monitoring our procedures

The Compliance Committee will review this Policy regularly, at least annually and activities under this Policy will be included in the yearly report of the Compliance Committee.

Signed by:
Nicolas Besins
 Signer Name: Nicolas Besins
 Signing Reason: I approve this document
 Signing Time: 21 July 2025 | 4:07:50 PM CEST
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Nicolas Besins

CEO

Signed by:
Alexandre Besins
 Signer Name: Alexandre Besins
 Signing Reason: I approve this document
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Alexandre Besins

CEO