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 1,600 employees in multiple U.S. and international locations and has a worldwide presence.

Neogen Europe Ltd is an R&D and production centre in its own right with a development pipeline of products for food safety and plant disease of particular relevance to the challenges faced by the European agri-food industries. The Group employs over 200 people across three UK sites but also has a small workforce based in France and Germany. The Company has two subsidiaries; Neogen Culture Media (formerly known as Lab M) and Quat-Chem. Neogen Europe Limited Group conducts business in Europe, the Middle East and 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 www.neogen.com/uk

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 900 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 a modern slavery policy. We also have robust procedures in place for the approval and subsequent review of suppliers. All requests to use new suppliers are reviewed by our Group Head of Quality & Compliance.

We also make sure our suppliers are aware of our policies, and require them to adhere to the same high standards. We have built a Statement of Compliance to the Modern Slavery Act 2015 into our process for new supplier process.

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

These policies have been developed by in conjunction with our Managing 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 Modern Slavery Policy.
Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor 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 continue to monitor 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. We will confirm that suppliers in these countries understand the principles of Modern Slavery laws and will comply with our policy and 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 audit these providers to ensure that modern slavery does not occur.

In order to ensure all our suppliers adhere to our anti-slavery policy, we are looking at introducing formalised procurement terms and conditions to include a modern slavery clause. We enforce a strict code of compliance and 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 training programmes, employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. The training has been targeted to the most relevant staff but the plan is to roll this out to all staff over time.

7: FURTHER ACTIONS AND SIGN-OFF

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Provide wider training to the business on awareness of Modern Slavery. Such training shall be integrated into both induction and on-going learning for employees.
- Introducing more comprehensive procurement terms and conditions

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 2018 and ending 31 May 2019.

This statement was approved by the Board on 18 April 2019.
Signature: S Cole.

Dr Steve Chambers
Managing Director
Date: 18/4/19.