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 1,800 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 350 people across four 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 three subsidiaries; Quat-Chem Ltd, Megazyme Ltd and NEOGEN Italia SRL. NEOGEN Europe Limited 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 http://www.neogen.com/

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 procedures in place for the initial approval of supplier requests with key requests being reviewed by our Quality Department.

Utilizing NEOGEN’s supplier questionnaire, 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 Whistleblowing 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 Modern 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 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 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 Modern 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, all staff are provided with awareness and we will be implementing future training to all staff to further increase awareness.

7: FURTHER ACTIONS AND SIGN-OFF

We recognise that we are publishing our statement later than expected for this financial year. Efforts to further advance our efforts combat modern slavery and enhance our processes have not progressed in our financial year 1 June 2019 and ending 31 May 2020 following the global COVID-19 pandemic due to increased business pressures, reduced revenues and staff capacity coupled with increased staff absence. NEOGEN has been heavily involved in the global COVID-19 response through continuing to ensure the safety, quality, and quantity of the global food supply, in addition to manufacturing products used in the global fight against COVID-19. Accordingly, our efforts have been focused in these areas and ensuring the business remains profitable and jobs are protected whilst ensuring the safety of our employees. A more detailed review to prevent slavery or human trafficking from occurring in our business or supply chains will be undertaken in 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 2019 and ending 31 May 2020.
This statement was approved by the Board on 11 June 2021

Signature:

Steven Donnachie
Group Finance Director

Date: 14 June 2021