MARCH 2019

MODERN SLAVERY STATEMENT (2018)

Introduction

This statement is made for the purposes of section 54 of the Modern Slavery Act 2015 (Act) by LFB BIOMÉDICAMENTS S.A. (LFB BM) and LFB Biopharmaceuticals Ltd (LFB UK) jointly (together LFB or we). This constitutes our modern slavery statement for the financial year ended 31 December 2018.

Modern slavery takes many forms and references to modern slavery in this statement means slavery, servitude, forced and/or compulsory labour and human trafficking.

Policy Framework

LFB fully supports the aims of the Act and is committed to operating free from modern slavery. We have a zero tolerance approach to any form of modern slavery, in any part of our business and supply chains.

Through the LFB Group’s Corporate Charter (Corporate Charter) we apply principles that require all our employees to behave in an ethical, law-abiding manner. The Corporate Charter requires high standards of conduct relating to human rights, working conditions, the environment, anti-corruption and transparency in all of our business activities. It details the LFB Group’s commitment to corporate social responsibility and includes the pledge to “develop a responsible purchasing policy and promote good practice with regard to [our] suppliers.”

LFB BM is committed to full compliance with the French Labour Code including, for example, Article L211-1 which imposes an employment ban on minors under the age of 16 and Article L8221-3 designed to combat concealed employment.

Our businesses

LFB is part of a multi-national group specialising in biological medicinal products for serious and (in many cases) rare diseases. Its products are aimed at health professionals, mainly hospital-based, in the three fields of immunology, haemostasis and intensive care. LFB’s key business activities take place primarily in Europe and the USA. Accordingly, based on the type and place of our activities, we consider, without diminishing our commitment to operate free of modern slavery, the modern slavery risk in our business and our supply chains (as described below) as low.

LFB BM does not employ anyone in the UK. LFB UK’s employees are principally involved in marketing activities. Our recruitment procedure sets out the standards to be applied during our employee selection process.

LFB provides training to its employees on the Group’s policies referred to in this statement. LFB BM also trains its employees on the obligations under the French anti-bribery Act and the Sunshine Act to ban gifts to healthcare professionals and organisations. LFB UK trains its staff about compliance with the Bribery Act 2010 and the Association of the British Pharmaceutical Industry Code of Practice.
Our supply chains

Our LFB Group General Terms of Purchase (GTP) requires our suppliers, contractors, agents, distributors and all other third parties acting on our suppliers’ behalf to comply with all applicable laws (including the provisions of the French Labour Code relating to illegal labour) and health and safety requirements. Under the GTP, our French suppliers must submit to LFB evidence of their compliance with labour regulations both before the acceptance of the contract and every six months during the contractual relationship. In doing so, our suppliers confirm they have made all necessary social security declarations to the relevant authorities. Our individual supplier contracts set out similar obligations. We consider these to be of great importance in establishing and continuing our business relationships.

Our last actions

LFB Group has implemented an anti-bribery code of conduct that reaffirms the LFB Group ethical commitments. This code applies to all affiliates, employees and external stakeholders (such as consultants, service providers, suppliers).

Although the primary objective of this code is to fight against corruption, it extends to cases of modern slavery through its professional alert line. LFB Group has indeed set up a whistleblowing system that can be used by all affiliates, employees but also external and occasional collaborators for serious and manifest violations of international texts or a serious threat or prejudice to the general interest, or to denounce conduct or situations contrary to the values of the LFB as defined in our unilateral commitments.

Signed on behalf of LFB BIOMÉDICAMENTS and LFB Biopharmaceuticals Ltd by:

Denis Delval
CEO, LFB BIOMÉDICAMENTS S.A.

Philippe Grédy
Sole Director,
LFB Biopharmaceuticals Ltd