

**BENCHMARK HOLDINGS PLC (“BENCHMARK”)
MODERN SLAVERY STATEMENT**

THE MODERN SLAVERY ACT

1. The UK implemented the Modern Slavery Act in 2015. The act places obligations on companies to ensure that there is no modern slavery in their own operations, and in those of their suppliers.
2. Modern slavery encompasses any form of slavery, servitude, forced labour, and human trafficking.
3. A copy of the UK Modern Slavery Act 2015 can be found at: www.legislation.gov.uk/ukpga/2015/30/contents

ABOUT BENCHMARK AND ITS SUPPLY CHAINS

4. Benchmark is a leading aquaculture biotechnology company with a mission to drive sustainability in aquaculture by delivering products and solutions that improve sustainability and profitability for aquaculture producers through better yield, quality and animal health and welfare.
5. Benchmark focusses on three complementary areas that are critical in the aquaculture cycle: genetics, advanced nutrition and health.
6. Benchmark’s supply chains include, but are not limited to:
 - Raw material suppliers;
 - Active pharmaceutical ingredient suppliers;
 - Component suppliers (packaging etc);
 - Contract manufacturers;
 - Pharmaceutical and biotechnology companies;
 - Freight forwarders, warehouse providers and third-party logistics providers; and
 - Distributors.

BENCHMARK’S COMMITMENT TO COMBATTING MODERN SLAVERY

7. Benchmark is committed to doing business with integrity and in an ethical manner. This includes a commitment to ensuring that there is no modern slavery in its own operations, and engaging actively with its suppliers to prevent any modern slavery in its supply chains.
8. Benchmark aims to ensure that there is no modern slavery in its own operations, or that of its suppliers, by:
 - Setting out a clear policy in relation to modern slavery.

- Providing employees of Benchmark with annual training to ensure that they are aware of the nature of modern slavery and the Company's policy in relation to it.
 - Implementing recruitment and people policies designed to ensure that no modern slavery can occur within the Benchmark group.
 - Implementing due diligence procedures, and placing contractual obligations, on its suppliers, to mitigate the risk of modern slavery within our suppliers or in their supply chains.
 - Encouraging employees to be vigilant and report any suspicions of modern slavery.
 - Providing employees with suitable channels of communication, through which concerns can be raised, and ensuring that sensitive information is treated appropriately.
 - Investigating suspicions of modern slavery and ensuring that appropriate action is taken.
9. The Benchmark group operates in many locations globally, and has many suppliers operating in numerous sectors around the world. The diversity, scale and reach of the Group's operations, and that of its suppliers, gives Benchmark an opportunity to positively influence the environment in which many people work. This Modern Slavery Statement is considered an important part of the way in which Benchmark people are expected to conduct business.
10. This Modern Slavery Statement applies to all employees within the Benchmark group of companies.

BENCHMARK'S ACTIVITIES IN RELATION TO MODERN SLAVERY

TRAINING

11. Benchmark has launched a structured ongoing mandatory training programme to ensure that all of its employees are aware of and understand Benchmark's Modern Slavery Policy. Our training programme includes "on-demand" training accessible through our intranet as well as bespoke webinars and workshops delivered to employees to encourage engagement and understanding.

DUE DILIGENCE PROCESSES

12. Benchmark requires that thorough right to work checks are undertaken before any person is employed in the U.K., and the Company is implementing measures to confirm that it is in full compliance with equivalent rules globally.
13. Benchmark aims to be a better employer, going beyond what is required by law, and pays all of its people at least the living wage, in all countries where a standard living wage is set by the Living Wage Foundation or similar organization. For countries where there is no living wage standard, Benchmark is aiming to implement a system by which a reasonable living wage is determined as a percentage of pay above the minimum wage in that country, having regard to living wage levels in similar countries, and intends to pay all of its people at least that derived living wage.
14. Benchmark has implemented a system of conducting due diligence on its suppliers designed to verify that there is no modern slavery in its suppliers' operations, and that suppliers are not aware of any modern slavery in their own supply chains. This includes asking the supplier to complete a short compliance questionnaire and seeking contractual undertakings from the supplier when required.

RISK ASSESSMENT

15. Where the Benchmark group is dealing with suppliers in countries where there is a higher risk of corruption or which are subject to economic sanctions, enhanced due diligence is conducted on the supplier in relation to economic sanctions, serious offences, and serious adverse media and reputational matters.
16. Benchmark maintains a register of its most significant suppliers, against which a modern slavery risk assessment is undertaken based on sector, geographical location and other relevant factors. Where appropriate, action will be taken to follow up with the supplier to seek to ensure that no modern slavery is taking place.

POLICIES

17. Benchmark has a Modern Slavery Policy, designed to ensure that its people are aware of the risks of modern slavery and reflect our commitment to acting ethically and enforcing our systems effectively to ensure slavery and human-trafficking is not taking place in our business or our supply chains.
18. Benchmark has an employee Code of Conduct, which includes guidance on decision making across the business to help guide its employees to do business in a way that is compliant, with integrity, and to make ethical, responsible decisions.
19. Benchmark operates a Whistleblowing Policy, designed to ensure that its people are able to raise concerns, such as in relation to modern slavery, securely and without fear of reprisals.

NEXT STEPS

20. Benchmark is committed to continuing its efforts to monitor the risk of slavery and human trafficking, and to improve its processes accordingly. In FY22, Benchmark intends to focus on the development and roll-out of a more formalised approach to due diligence on our key suppliers, including:
 - **Legislation:** Continuing to take the right steps in implement human rights due diligence processes in line with legislation, by monitoring and improving existing policies;
 - **Auditing:** Implementing a stronger due diligence process on our Supply Chain in line with environmental, social and governance, by the introduction of:
 - an updated supplier due diligence questionnaire with input from health and safety, ESG and legal colleagues;
 - a new supplier code of conduct which will set clear expectations for our suppliers and assist us in reviewing adherence to our standards; and
 - a new risk-based supplier analysis.
 - **Engagement:** Working with suppliers to monitor and mitigate modern slavery risks in their own supply chains; and
 - **Training:** Actively training our employees to identify and monitor modern slavery risks.

RESPONSIBILITY

21. The prevention of modern slavery is the responsibility of all Benchmark people, particularly those responsible for teams

internally and for relationships with suppliers.

This Modern Slavery Statement is reviewed annually. Any significant issues arising are immediately reported to the Board of Benchmark Holdings plc, and other issues arising are reported on a routine basis to the Board of Benchmark Holdings plc.

STATEMENT

22. The Board of Benchmark Holdings Group plc continues to work with management to ensure the company is effective in combatting modern slavery. This commitment forms part of the Group's wider sustainability strategy.

23. The Board can confirm that in the last 12 months:

- No slavery or human trafficking issues have been identified;
- No reports were made under the Modern Slavery Act Policy or under the Freedom to Speak Up Policy with respect to modern slavery and human trafficking; and,
- No remedial actions have been required.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Benchmark group's slavery and human trafficking statement for the current financial year.

Approved by the Board of Benchmark Holdings plc, and signed on behalf of Benchmark Holdings plc.



George Peter (Mar 23, 2022 10:03 EDT)

Chairman and Director

Date: 23-Mar-2022