



## Modern Slavery Act Transparency Statement – Fiscal Year

### Organisation Structure, Business, and Supply Chain

bluebird bio, Inc. (“bluebird”) is developing products for a range of diseases to developing potentially transformative developing products for a range of diseases with our 3 gene therapy technology platforms: gene addition, cell therapy and (megaTAL-enabled) gene editing. We’re also working to positively disrupt healthcare systems to create access, transparency and education so gene therapy can become accessible to all those who can benefit. Headquarters in Cambridge, MA with additional nests in Seattle, WA; Durham, NC; and Zug, Switzerland.

bluebird bio (UK) Ltd., a company incorporated in the United Kingdom, is the commercial sales and marketing organization for bluebird in the United Kingdom. These activities include the sales, marketing and distribution of bluebird pharmaceutical products, in accordance with regulatory processes and codes.

bluebird's supply chain consists of contract manufacturing organisations (CMOs) suppliers for product inputs, packaging, other goods and services for healthcare organisations and healthcare professionals.

### Policies in Relation to Slavery and Human Trafficking

bluebird maintains written policies, procedures and guidelines, which include our [Code of Business Conduct and Ethics](#), in which bluebird communicates its ethical principles and high expectations of integrity from all its employees, contractors, and business partners. As part of bluebird's Compliance and Ethics program, all bluebird employees, regardless of location, receive training on and must adhere to our Code of Business Conduct and Ethics. The Code and the various written policies and training programs that support it, are designed to create a culture of ethics and integrity and to facilitate compliance with the laws of all jurisdictions in which bluebird operates.

### Due Diligence Processes in Relation to Slavery and Human Trafficking in Our Business and Supply Chain

As part of bluebird’s anti-bribery/anti-corruption program, due diligence reviews are conducted for all our third-party vendors, including suppliers involved in bluebird’s supply chain. This includes, but is not limited to, periodic searches of public records and media reports related to human rights violations.

### Parts of Business and Supply Chain with Risk of Slavery and Human Trafficking Taking Place and Steps Taken to Assess and Manage Risk

bluebird currently operates and engages with suppliers in the United States and Europe, countries more economically developed and predominately with a very low prevalence of slavery according to the [Global Slavery Index](#), [U.S. Department of State’s Trafficking in Persons Report](#), and other independent assessments.

bluebird's written agreements with all its business partners require compliance with all applicable laws and regulations as well as the right to audit and visit to review the services provided by such vendors or suppliers. Additionally, bluebird requires adherence by our business partners to bluebird policies and standards, including our Code of Business Conduct and Ethics.

Effectiveness in Ensuring that Slavery and Human Trafficking is not Taking Place in Our Business or Supply Chains, Measured Against Such Performance Indicators as Considered Appropriate

As part of the onboarding process for bluebird bio (UK) Ltd. employees, verification of immigration status and right-to-work is completed.

As of the date of this statement, bluebird's Global Compliance Department has not received any complaints or notifications into any matters relating to modern slavery either through the [bluebird bio Hotline](#) or other mechanisms.

Training about Slavery and Human Trafficking Available to Staff

All bluebird employees, regardless of location, must complete training agree to adhere to our Code of Business Conduct and Ethics on an annual basis. Additional training relating to our anti-bribery/anti-corruption program is also administered on an annual basis and required to be completed. Both trainings have sections dedicated to supplier conduct which includes human rights.

This statement is made pursuant to Section 54 of the Modern Slavery Act of 2015 and constitutes bluebird's anti-slavery and human trafficking statement for the financial year ending on December 31, 2018.

Signed,

A handwritten signature in blue ink, appearing to read "Erik Matala".

Erik Matala  
Head of Legal, Europe  
Director, bluebird bio (UK) Ltd.