

## **THERMO FISHER SCIENTIFIC INC.**

### **HUMAN RIGHTS AND MODERN SLAVERY TRANSPARENCY STATEMENT 2022**

Thermo Fisher Scientific Inc. is fully committed to acting with integrity and high ethical standards. This includes a commitment to ensuring that our own operations and our supply chain respect human rights and uphold global standards for equal opportunities, the freedom to associate, as well as the elimination of modern slavery, human trafficking, and harmful or exploitative forms of child labor.

This statement is made pursuant to the California Transparency in Supply Chains Act (“California Act”), section 54(1) of the UK Modern Slavery Act (“UK Act”), the reporting requirements under the Commonwealth of Australia Modern Slavery Act (“Australian Act”) and the Norwegian Transparency Act (“Norwegian Act” and, collectively, the “Acts”). It constitutes our human rights and modern slavery transparency statement for the financial year ending 31 December 2022 and is intended to provide our customers, stakeholders and investors with information on human rights and modern slavery risks Thermo Fisher Scientific has identified and the systems and controls that we have implemented to prevent or limit these risks in our supply chain.

Our previous human rights and modern slavery statements are available in the “Corporate Social Responsibility” section of our website under the heading “Global Supply Chain,” which can be found [here](#).

#### **Organization Structure**

Thermo Fisher Scientific Inc., as parent company of the Thermo Fisher Scientific group of companies (“Thermo Fisher Scientific” or the “Group”), issues this statement on behalf of itself and each of its subsidiaries that are subject to each of the Acts, respectively, and in particular its UK, Australian and Norwegian subsidiaries listed in the Appendix, which have conferred and collaborated in the preparation, review and finalization of this statement.

Thermo Fisher Scientific is the world leader in serving science. Our Mission is to enable our customers to make the world healthier, cleaner and safer. We serve customers working in pharmaceutical and biotech companies, hospitals and clinical diagnostic labs, universities, research institutions and government agencies, as well as environmental, industrial quality and process control settings. Our global team delivers an unrivaled combination of innovative technologies, purchasing convenience and pharmaceutical services through our industry-leading brands, including Thermo Scientific, Applied Biosystems, Invitrogen, Fisher Scientific, Unity Lab Services, Patheon and PPD.

We report our business in four segments - Life Sciences Solutions, Analytical Instruments, Specialty Diagnostics, and Laboratory Products and Biopharma Services.

Our supply chain includes tens of thousands of suppliers globally. These suppliers provide the raw materials we use for manufacturing, services to support our research teams and the lab equipment, chemicals, and other vital goods used across our manufacturing and service network around the world. No single supplier is material, although for reasons of quality

assurance, regulatory requirements, cost effectiveness, availability or uniqueness of design, certain materials components may be sourced from a single supplier or a limited number of suppliers that can readily provide such materials or components.

For more information regarding our business, please see the “Business” section of our Annual Report on Form 10-K for the year ended 31 December 2022, which can be found [here](#).

## **Our Policies and Guidelines**

As a signatory to the UN Global Compact (“UNGC”), Thermo Fisher Scientific is committed to aligning corporate strategy with the Ten Principles on human rights, labor, environment and anti-corruption and to the applicable laws and fair labor practices, as evidenced by the following:

- [Code of Business Conduct and Ethics](#)
- [Supplier Code of Conduct](#)
- [Conflict Minerals Statement](#)
- [Human Rights and Equal Opportunity Policy](#).

The Human Rights and Equal Opportunity Policy, which was most-recently updated in 2022, helps us implement our commitment to human rights in alignment with leading international standards, including the UN Universal Declaration of Human Rights and the International Labour Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work.

When differences arise between our standards and legal requirements, we apply the stricter standard in compliance with applicable laws.

With the rapid evolution of technology, society’s needs and stakeholder expectations, we continue to strengthen our policies and business processes for identifying, assessing and managing human rights risks. Through the Company policies outlined above, our human rights principles, standards and practices are incorporated into a broader suite of policies. We conduct periodic internal reviews of our systems and controls and participate in human rights peer networks for best practice sharing. These engagements and disclosures enhance the transparency with which we honor our commitment to uphold and respect human rights.

## **Our Code of Business Conduct and Ethics**

The Thermo Fisher Scientific Code of Business Conduct and Ethics (the “Code”) is translated into 21 languages and covers a broad range of topics, including policies related to conflicts of interest, honest and ethical fair dealing, bribery and improper payments, insider trading, export control awareness, human rights, privacy matters, and sexual harassment. It applies to all Thermo Fisher Scientific employees and sets forth our commitment to conduct business with the highest ethical standards and to comply with all applicable laws and regulations. Violations are not tolerated and may lead to disciplinary action, up to and including termination (if applicable).

All employees receive compulsory annual training on the importance of acting ethically and with integrity in every area of our business, and biannual training aimed to enhance our colleagues’ knowledge of human rights within the context of our business and their role in respecting them. Further, employees are required to promptly report any known or suspected breach of the Code or other illegal or unethical behaviour.

We offer a number of resources for reporting such as our confidential Global Ethics Hotline, a telephone and web-based hotline maintained by a third party for the purpose of gathering

information regarding compliance and ethics concerns. The Global Ethics Hotline is available to colleagues, customers and other external stakeholders such as suppliers and workers in the supply chain to raise concerns, anonymously if requested, related to any issue, observed or suspected, including human rights issues, and violation of any law, regulation, the Code, or Company policy. Therefore, if there are any concerns, these can be raised in confidence and without fear of retaliation.

Reports to our Global Ethics Hotline of violations of law, the Code, or other Thermo Fisher Scientific policies are rigorously investigated.

## **Our Supply Chain**

Every year, we purchase billions of dollars in goods and services from tens of thousands of suppliers around the globe. We source components that are used both at our facilities and by our external partners to manufacture our products. With such a complex and global structure, the supply chain is the main area where Thermo Fisher Scientific is at the highest risk for contributing to adverse human rights impacts.

Thermo Fisher Scientific expects suppliers to treat their employees with dignity and respect, to comply with all legal and regulatory requirements pertaining to the fair treatment of employees, and to proactively assess and monitor their subcontractors to ensure they abide by the same principles. We are committed to implementing effective systems and controls to ensure that our suppliers recognize our position in relation to compliance with all applicable laws and regulations, including those relating to the prohibition of slavery and human trafficking.

Striving to ensure that our suppliers are committed, and work diligently to respect human rights and worker safety, is paramount for our ability to deliver on our sustainability goals.

More information about our supply chain is available in the “Corporate Social Responsibility” section of our website under the heading “Global Supply Chain,” which can be found [here](#).

## **Supplier Code of Conduct**

The Thermo Fisher Scientific Supplier Code of Conduct (“Supplier Code”) outlines expectations for our suppliers/partners and their subcontractors in the areas of ethics, labor, health and safety, environment and management systems, supply chain transparency, product and service innovation, and customer satisfaction. In 2022, we revised our Supplier Code to capture expectations associated with new local laws and regulations. These expectations are in line with our corporate values, the Code and UNGC, and include:

- prohibitions on use of child labor, as described in Minimum Age Convention 138 and Worst Forms of Child Labor Convention 182 of the International Labor Organization.
- prohibitions on forced labor/prison labor, as described in Article 2 in the Forced Labor Convention 29 and Article 1 in the Abolition of Forced Labor Convention 105 of the International Labor Organization.
- requirement to comply with all applicable labor laws, rules, and regulations, including but not limited to, all laws forbidding the solicitation, facilitation, or any other use of slavery, servitude, forced or compulsory labor or human trafficking;
- requirements for our suppliers to provide to us all information or material required to enable Thermo Fisher Scientific to ensure compliance with such laws, rules, and regulations; and
- commitments to responsible sourcing practices, including: (i) taking appropriate health and safety measures, (ii) acting in an environmentally responsible manner, (iii) commitments to diversity, inclusion, fair treatment and decent working conditions.

The Supplier Code is also integrated into supply agreements and terms and conditions, and suppliers are expected to share their performance against Supplier Code expectations at our request. Thermo Fisher Scientific reserves the right to take appropriate contractual measures up to and including contract termination where necessary and appropriate as outlined in the Supplier Code.

## **Supply Chain Due Diligence, Risk Assessment and Management**

We have developed processes and management systems to appropriately identify and assess adverse impacts, prevent or mitigate these impacts or provide for remediation when appropriate, and track implementation, as informed by the OECD Due Diligence guidance. Further details are available in the “Corporate Social Responsibility” section of our website under the heading “Global Supply Chain,” which can be found [here](#).

Considering the size and complexity of our supply chain with a vast number of suppliers to assess, our risk assessment process is of paramount importance. Our risk-based approach to supplier engagement and monitoring allows us to focus our resources on areas that we believe have the largest potential impact. Criteria considered in our risk assessment include:

- Geography in which the supplier operates and inherent environmental, social and governance (ESG) related risk in the region;
- Industry-specific risks, such as those found in mining of tin, tantalum, tungsten, and gold (or “3TG”) materials (also known as conflict minerals). Further details are available in the “Corporate Social Responsibility” section of our website under the heading “Global Supply Chain,” which can be found [here](#);
- Previous supplier performance in environmental and social assessments or audits; and
- Criticality of supply or strategic nature of the buyer-supplier relationship.

Human rights are integrated into our supplier due diligence process, where indicators such as the risk of child labor, the risk of modern slavery, the right of freedom of association, and the decency of working conditions are evaluated.

In 2022, Thermo Fisher Scientific utilized multiple mechanisms to conduct due diligence to evaluate and address modern slavery risks, such as third-party reviewed supplier assessments, including specific human rights assessments, and onsite auditing. These mechanisms allow us to monitor compliance with our Supplier Code and to assess and accelerate improvements in supplier ESG practices affecting the environment, labor and human rights, ethics, and sustainable procurement.

Third-party reviewed supplier assessments were conducted utilizing the globally recognized EcoVadis platform for the following supplier populations:

- Suppliers representing the top 50% of direct materials spend for our self-manufactured product portfolio; and
- Suppliers who were identified as high-risk based on the risk assessment criteria described above.

In all cases, where the information provided by a supplier was considered to represent residual risk or insufficient management systems, corrective action plans were developed. Thermo Fisher Scientific monitors these suppliers to confirm that the corrective action plans are implemented, and suppliers are reassessed in twelve months’ time to monitor for continuous improvement. Suppliers who persistently refuse to participate or do not demonstrate continuous improvement are targeted for escalated engagement, including performance of a third-party, onsite audit.

Additionally, more specific supplier surveying was undertaken by a third party for additional investigation in the following areas:

- A pilot human rights assessment activity, with suppliers in high-risk sectors for forced labor, to test for increased visibility into the practices of the sub-tier supply chain;
- Due diligence activities associated with responsible mineral sourcing of 3TG materials. Detailed information is available in our conflict minerals report for the year ended 31 December 2022, which can be found [here](#).

Finally, for certain suppliers representing particularly high business risk, onsite audits, all of which were announced, were conducted by third-party independent auditors covering compliance, ethical trading, labor regulations and standards, and responsible production practices. Where onsite audits identified findings, corrective action plans were developed and mutually agreed upon between Thermo Fisher Scientific and the supplier and follow up audits were conducted to confirm issues were resolved.

## **Training**

As Thermo Fisher Scientific continually improves responsible procurement processes and champions suppliers' sustainability initiatives, in 2022 we have advanced our education offerings, as follows:

- A series of nine webinars offered to Thermo Fisher Scientific colleagues on supplier responsibility topics, such as ESG performance ratings and the Supplier Code. The Supplier Code was also directly distributed by the Global Sourcing team to over 14 thousand supplier contacts;
- Launch of a new introduction to supplier responsibility training course, which was taken by more than 600 Thermo Fisher Scientific procurement colleagues and is now included in standard onboarding training for new procurement colleagues;
- Holding webinars related to EcoVadis in local languages: more than 200 suppliers participated in EcoVadis Academy courses in 2022, covering topics such as introduction to sustainability, sustainability management systems, and policy development in the areas of environment, human rights and labor, ethics and sustainable procurement.

Thermo Fisher Scientific also joined the Sustainable Procurement Pledge, an international, non-profit organization for procurement professionals, academics, and practitioners, driving awareness and knowledge of responsible sourcing practices and empowering people in procurement.

## **Our Effectiveness in Combatting Slavery and Human Trafficking**

Thermo Fisher Scientific will continue to review and improve its practices to respect human rights for rightsholders affected by our business and identify and eliminate, to the fullest extent practicable, modern slavery or human trafficking from our business and supply chain. In order to maintain and continually improve our own operational and supply chain performance we:

- work on improving sub-tier visibility and risk assessment tools;
- share best practices and work with our key suppliers to reduce supply chain risks;
- regularly review our human rights policies as outlined above to drive alignment with global regulatory and business best practices;
- monitor and work to improve supplier diligence response rates via targeted initiatives;
- target supplemental training for suppliers in high-risk regions/sectors; and
- investigate, and where possible, help to drive the remediation of, any complaints received and substantiated related to human rights in our operations or supply chain.

Our actions as described above support the Thermo Fisher Scientific long-term commitment to respect the human rights of all people and to improve the quality of life in the communities we serve.

**Signed on behalf of Thermo Fisher Scientific Inc.**

A handwritten signature in black ink that reads "Marc Casper". The signature is written in a cursive style with a large initial 'M' and 'C'.

**Marc N. Casper**  
**Chairman, President, and Chief Executive Officer**

## Appendix

### Thermo Fisher Scientific Inc. significant UK subsidiaries

FEI UK Limited
Fisher Clinical Services UK Limited
Fisher Scientific UK Limited
Life Technologies BPD UK Limited
Life Technologies Limited
Oxoid Limited
Patheon UK Limited
Thermo Electron (Management Services) Limited
Thermo Electron Manufacturing Limited
Thermo Electron Limited
G&M Procter Limited
Thermo Fisher Diagnostics Limited
PPD Global Ltd
Synexus Clinical Research Limited

### Thermo Fisher Scientific Inc. significant Australian subsidiaries

FEI Melbourne Pty Ltd
FEI Australia Pty Ltd
Fisher Scientific Australia Pty Ltd
Oxoid Australia Pty Ltd
Thermo Gamma-Metrics Holdings Pty Ltd
Thermo Gamma-Metrics Pty Ltd
Thermo Electron Australia Pty Ltd
Thermo Trace Pty Ltd
Thermo Fisher Scientific Australia Pty Ltd
Lomb Scientific (Aust) Pty Ltd
Technology Design Solutions Pty Ltd
App-tek International Pty Ltd
Patheon Biologics Australia Pty Ltd

### Thermo Fisher Scientific Inc. significant Norwegian subsidiaries

Life Technologies AS
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