



The world leader in serving science

## THERMO FISHER SCIENTIFIC INC.

### HUMAN RIGHTS AND MODERN SLAVERY TRANSPARENCY STATEMENT 2023

Thermo Fisher Scientific Inc.'s ("Thermo Fisher Scientific" or the "Company") 4i Values of Integrity, Intensity, Innovation and Involvement are the foundation of our culture, guiding all interactions with our customers, suppliers and partners, and communities, and with each other. As the first of these values, Integrity reminds our colleagues to honor commitments, communicate openly and demonstrate the highest ethical standards. This includes a commitment to ensuring that our own operations and our supply chain respect human rights and fair labor practices, 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"),
- the Norwegian Transparency Act ("Norwegian Act"),
- the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor ("VSoTr")<sup>1</sup>, and
- the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act ("Canadian Act" and, collectively, the "Acts").

This statement constitutes our human rights and modern slavery transparency statement for the financial year ending 31 December 2023 and was approved by the Thermo Fisher Scientific Board of Directors on 21 May 2024. 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, as parent company of the Thermo Fisher Scientific group of companies (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, Norwegian, Swiss, Canadian and U.S. subsidiaries listed in the Appendix, which have conferred and collaborated in the preparation, review and finalization of this statement.

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<sup>1</sup> Although the present report makes contextual references to Thermo Fisher Scientific's Responsible Minerals Sourcing Statement and due diligence activities associated with responsible mineral sourcing, none of the Group's Swiss subsidiaries meets the qualitative thresholds of import and processing of conflict minerals for the purposes of reporting under the VSoTr. Thermo Fisher Scientific also fully adheres to internationally recognized equivalent regulations on minerals and metals from conflict-affected and high-risk areas. On this basis, the Company and its Swiss subsidiaries are exempted from the conflict minerals related due diligence and reporting obligations of the VSoTr.

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. Whether our customers are accelerating life sciences research, solving complex analytical challenges, increasing productivity in their laboratories, improving patient health through diagnostics or the development and manufacture of life-changing therapies, we are here to support them. 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 and 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 2023, which can be found [here](#).

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](#)

## **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 Company policies:

- Code of Business Conduct and Ethics
- Supplier Code of Conduct
- Responsible Minerals Sourcing Statement
- Human Rights and Equal Opportunity Policy

The Human Rights and Equal Opportunity Policy helps us implement a human rights framework aligned 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. Our approach references the United Nations Guiding Principles on Business and Human Rights (“UNGP”) and the Organisation for Economic Co-operation and Development (“OECD”) Guidelines for Multinational Enterprises (“OECD Guidelines”).

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 of Conduct”) 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, respectful interactions at work and 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. Further, employees are required to promptly report any known or suspected breach of the Code of Conduct or other illegal or unethical behavior.

### **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, human rights, health and safety, environmental responsibility, and management systems. In 2023 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 of Conduct and the UNGC’s Ten Principles, 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 non-discrimination and equal opportunity, and fair treatment.

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.

## **Complaint Procedures – Global Ethics Hotline**

We encourage reporting and offer a number of resources for the reporting of illegal or unethical behavior in our operations or in our supply chain, such as our confidential [Global Ethics Hotline](#) (“Ethics Hotline”). The Ethics Hotline is our telephone and web-based hotline maintained by a third party for the purpose of gathering information regarding compliance and ethics concerns. It 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 of Conduct, or other Company policies.

In addition, and in line with our company value of Integrity, anyone can report human rights-, ethics-, and compliance-related concerns directly to any level of internal leadership, as well as to Legal or Human Resources representatives.

Reports of violations of law, the Code of Conduct, or other Company policies are rigorously investigated and documented.

Our non-retaliation policy ensures that retaliation against any person who lawfully and in good faith seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited and will not be tolerated.

The Supplier Code also indicates that any supplier’s unlawful retaliation against its employees, including the threat of reprisal, intimidation, or harassment, for reporting violations or cooperating in investigations, is prohibited.

## **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 for Responsible Business Conduct (“OECD Guidance”).

In 2023, we increased oversight of our human rights management approach, designating a Global Human Rights Counsel with responsibility for leading the coordination of our legal human rights program across all businesses. This appointment will further improve awareness, compliance and adherence to governing principles and ethical and legal codes. The Global Human Rights Counsel reports to senior management on a regular basis.

During the year, we continued to enhance our human rights due diligence practices. This included in-depth human rights risk assessment of our operations and supplier network in compliance with regulatory requirements. Our assessments indicate that human rights risks, including forced and child labor risks, in our operations in the aggregate remain low. This is primarily due to our company-wide applicable standards, and the preventive and mitigating measures that we have implemented in our standard processes, such as comprehensive policies, employee training, personnel documentation checks, use of working time management systems, and EHS site audits and certifications. A new internal oversight process enables the company to more regularly monitor human rights-related matters, and continue to identify, assess and manage human rights risks.

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 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, human trafficking, and child labor. 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.

Details on our supply chain risk assessment 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. In 2023, we expanded our supply chain due diligence program beyond the high-spend direct materials segment to incorporate suppliers that demonstrate a greater inherent risk based on the following criteria:

- Geography
- Industry-specific risks
- Minerals sourced from conflict-affected and high-risk areas
- Supplier performance in environmental and social assessments or audits
- Criticality of supply
- Strategic nature of 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 2023, 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 practices affecting the environment, labor and human rights, ethics, and sustainable procurement.

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

- suppliers representing the top 55% 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 engagement was undertaken for additional investigation in the following areas:

- An AI-powered analysis to identify key tier-one suppliers who may be at greater risk for working with entity list companies identified by US Customs and Border Protection. These key suppliers were asked to confirm their willingness to comply with the Supplier Code of Conduct and conduct appropriate forced-labor due diligence in their own supply chains.
- Due diligence activities associated with responsible sourcing of materials containing or consisting of tin, tantalum, tungsten and gold. Detailed information is available in our conflict minerals report for the year ended 31 December 2023, 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 the Company and the supplier and follow up audits were conducted to confirm issues were resolved.

## **Training**

All employees globally receive compulsory annual training on the ethical and human rights principles and standards outlined in our Code of Conduct and the Human Rights and Equal Opportunity Policy. This training is offered in 21 languages, mapped to the regions where employees are based.

As Thermo Fisher Scientific continually improves responsible procurement processes and champions suppliers' sustainability initiatives, in 2023 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 sustainability performance ratings and the Supplier Code,
- 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, and
- holding webinars related to supply chain sustainability in local languages: more than 200 suppliers participated in computer based training courses in 2023, 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 continued its work with 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.

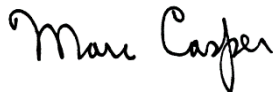
## **Monitoring our Effectiveness in Mitigating Negative Human Rights Impacts by our Business Activities and Relationships, and Combatting Slavery, Child Labor and Human Trafficking**

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, child labor 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,
- track, 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,
- conduct effectiveness review of our Ethics Hotline based on test cases, and
- monitor the effectiveness of our Code of Conduct training, taking into account training scope and audience, training questions and answers content, employee attestation of completion and compliance with required standards, and training completion rates.

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.**



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

## Appendix

### Thermo Fisher Scientific Inc. significant UK subsidiaries

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| 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             |
| Evidera Ltd                                   |

### Thermo Fisher Scientific Inc. significant Australian subsidiaries

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| 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        |
| PPD Australia Pty Limited                  |

### Thermo Fisher Scientific Inc. significant Norwegian subsidiaries

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| Life Technologies AS (and its subsidiaries) |
| Thermo Fisher Diagnostics AS                |
| Fisher Scientific AS                        |

### Thermo Fisher Scientific Inc. significant Swiss subsidiaries

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| Fisher Clinical Services GmbH (and its subsidiaries)                                     |
| Fisher Scientific AG   |
| Life Technologies Europe B.V., Nieuwerkerk aan den IJssel,<br>Zweigniederlassung Reinach |
| Thermo Fisher Scientific (Ecublens) S.à.r.l.(and its subsidiaries)                       |
| Thermo Fisher Scientific (Schweiz) AG (and its subsidiaries)                             |



**Thermo Fisher Scientific Inc. significant Canadian subsidiaries and U.S. subsidiaries  
doing business in Canada**

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|---|
| Fisher Scientific Company / Société Fisher Scientifique |
| Life Technologies Inc. Technologies Life Inc.           |
| PPD Canada, Ltd.  |
| Thermo CRS Ltd.   |
| Thermo Fisher Scientific (Mississauga) Inc.             |
| Patheon Inc.  |
| Fisher Clinical Services Inc.                           |
| Thermo Electron North America LLC                       |

Signed on behalf of the **Thermo Fisher Scientific Inc. significant Norwegian subsidiaries** pursuant to the Norwegian Transparency Act

### Life Technologies AS

Petrus Thomas Adrianos van der Zande  
Chairman

Signed by:  
*Petrus Thomas Adrianos van der Zande*  
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Anne Haugland  
Director

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*Anne Haugland*  
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Geir Hetland  
Director

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*Geir Hetland*  
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### Thermo Fisher Diagnostics AS

Petrus Thomas Adrianos van der Zande  
Chairman

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*Petrus Thomas Adrianos van der Zande*  
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Anne Omholt  
Director

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*Anne Omholt*  
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Sara Maria Carrella  
Director

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*Sara Maria Carrella*  
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### Fisher Scientific AS

Petrus Thomas Adrianos van der Zande  
Chairman

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*Petrus Thomas Adrianos van der Zande*  
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Anne Omholt  
Director

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Carolin Sonja Freidel  
Director

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