## **CSR** commitment

As the world leader in serving science, we understand that we have a unique opportunity and responsibility to use our position to make a positive impact on society—by enabling our customers' success and, also, through our actions as a company to make the world a better place. In our commitment to the global community, we take deliberate actions today to address the sustainability matters that will strengthen our business for tomorrow's customers, colleagues and communities.



#### **HIGHLIGHTS**



20+
translations of our Code of Business
Conduct and Ethics



99% ethics and compliance training completion rate<sup>1</sup>



Global Ethics Hotline
our anonymous and confidential incident
reporting system



ISO 27001
certified cybersecurity program

## **CSR PILLARS**



## **Operations**

Using our extensive capabilities to enable our customers while conducting our business and relationships with integrity



## Colleagues

Enabling our colleagues to bring their best each day, working and winning together as one global team



## Communities

Working to create positive change across the world, focusing on STEM education and health equity



## Environment

Advancing our net-zero roadmap and innovating to support our customers to achieve their sustainability goals

#### Endnote:

1. This indicator is calculated based on the number of ethics and compliance courses completed out of the number of ethics and compliance courses assigned to all colleagues.

# **CSR** strategy

Our CSR approach is built on a framework of four key pillars—Operations, Colleagues, Communities and Environment—that enable us to effectively manage the business, driving competitive differentiation and creating sustainable value for all our stakeholders. Reflected in our company goals, our CSR strategy is embedded across our organization and operations, and supports our long-term success. We continue to create a great place to work for our colleagues, provide high-quality products for our customers, deliver strong returns for our shareholders, make a difference in our communities and reduce our impact on the environment.



## Stakeholder engagement

Our robust stakeholder engagement program is designed to foster strong relationships and provide opportunities for regular interactions throughout the year. We engage with a range of stakeholders through our program, including customers, colleagues, communities, shareholders, rating agencies, governments and regulators and suppliers and business partners. Engagement opportunities include quarterly business reviews, investor relations touch points, industry group involvement, surveys, site visits, forums and more. These interactions are essential for gathering feedback, informing stakeholders of our progress and understanding their evolving interests and expectations. Our proactive approach allows us to regularly integrate their insights into our strategy, focus areas and programs.

In addition to communication channels dedicated to each of our stakeholder groups, our company also participates in multi-stakeholder forums throughout the year. In 2024, these ranged from involvement with the World Economic Forum in Davos-Klosters, Switzerland, UN Climate Week in New York City and the inaugural DCAT Sustainability Summit in Lugano, Switzerland to membership or involvement with programs such as the Sustainable Procurement Pledge and Responsible Minerals Initiative<sup>TM</sup>.

## Priority assessment

Our CSR strategy is also informed by regular priority assessments, which continually align our approach with the causes most relevant to our business and our stakeholders. Our company leadership team ensures our CSR priorities are embedded in business decisions and operating practices, which we believe also strengthens our organizational culture to drive results and success. Our priority topics<sup>2</sup> are: innovation, product safety and quality, diversity and inclusion, talent management, community development, and climate change.

## Reporting and transparency

Committed to transparent disclosure, our voluntary CSR reporting is guided by internationally recognized reporting standards and frameworks including:

- Global Reporting Initiative (GRI) Standards (2021)
- International Financial Reporting Standards (IFRS) Foundation's Sustainability Accounting Standards Board (SASB) Standards for Medical Equipment and Supplies (2023-12)
- Recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD)
- United Nations Sustainable Development Goals (SDGs)
- United Nations Global Compact Ten Principles (UNGCs)<sup>3</sup>

With a rigorous culture of compliance, we also closely monitor new and changing disclosure-related regulations as they emerge. As such, we are preparing to integrate additional standards into our approach as required by upcoming EU regulations.

Beyond annual reporting, we participate in relevant third-party assessments for independent validation of our CSR progress over time. Select organizations provide feedback on our strengths and opportunities—insights that serve as additional inputs to our CSR strategy, practices and disclosures.

See our CSR disclosure index for more information on our alignment to standards and frameworks, and visit our Reporting hub to review additional reports we publish.

## Sustainable finance

Our company's investment and treasury strategies continue to integrate intentional business practices that help Thermo Fisher fulfill both our financial and societal commitments. We work with a differentiated network of banking partners, leveraging our market position to engage them in elevated roles on U.S. bond issuances—an approach that enhances our capital-raising strategy while broadly increasing economic opportunity in the financial services sector. We are also involved in corporate deposit and impact investing programs that support mission-driven banks and direct investments aimed at addressing disparities in health and wealth. By conducting our business ethically, we are improving our global management strategies while fostering economic empowerment in local communities.

### Endnotes:

- 1. Our Annual Report on Form 10-K, CSR website and Proxy Statement also facilitate engagement and are relevant to all key stakeholder groups.
- 2. In our CSR reporting, when we use the terms "material," "materiality" and similar terms, we are using such terms to refer to topics that reflect our significant economic, environmental and social impacts or are important to stakeholders and our business success. We are not using these terms as they have been defined by or construed in accordance with the securities laws or any other laws of the United States or any other jurisdiction, or as these terms are used in the context of financial statements and financial reporting, and nothing in this report should be construed to indicate otherwise.
- 3. UNGC is the United Nations Global Compact and is an initiative to align business strategies and operations to human rights, labor, environment, and anti-corruption.

# Corporate governance

#### **Board of Directors**

Marc N. Casper

Chairman, President and CEO

Scott M. Sperling

Lead Independent Director

Nelson J. Chai

Chair, Audit Committee

Ruby R. Chandy

Director

C. Martin Harris, MD

Chair, Nominating and Corporate Governance Committee

Tyler Jacks, PhD

Chair, Science and Technology Committee

Jennifer M. Johnson

Director

R. Alexandra (Alex) Keith

Director

Karen S. Lynch

Director

James C. Mullen

Director

Debora L. Spar

Chair, Strategy and Finance Committee

Dion J. Weisler

Chair, Compensation Committee



Fostering success for Thermo Fisher and our stakeholders begins with robust corporate governance and oversight of our global activities. We are guided by our 4i Values and rigorous ethical standards, taking accountability in all we do to contribute to our customers' success while maintaining the long-term health of our business.

## Company oversight

Our Board of Directors is elected by our shareholders to oversee their interests in the long-term success of the company. The Nominating and Corporate Governance Committee, which is composed entirely of independent directors, seeks to develop a Board that reflects a broad mix of viewpoints, backgrounds, skills, experiences and expertise. The committee regularly reviews the desired skills, knowledge and backgrounds that should be represented on the Board.

Throughout the year, our Board and its committees discuss operations and company strategy. In 2024, this was focused on delivering on our commitments to all stakeholders, strengthening our industry leadership and accelerating the company's strategy to realize our 2030 Vision, with an emphasis on emerging technologies. Our Board meetings include regular sessions with business leaders and executives across key corporate functions. At regular meetings, the Board considers the drivers of our business execution along with key risks, challenges and opportunities, and considers how they relate to the effectiveness of our company strategy. The Board also dedicates an annual session to focus on long-term strategy and the future needs of, and opportunities for, the company.



## CSR oversight and management

The Board oversees our CSR strategy and key initiatives as an integrated part of the company's overall strategy and enterprise risk management. Certain matters related to CSR are delegated for discussion at the committee level, while other matters span multiple functional categories and areas of oversight and are discussed at the full Board level. This focus is reflected in our Corporate Governance Guidelines and committee charters, which expressly highlight the Board's role in the oversight of CSR, including climate change-related matters.

CSR is foundational to our company strategy, and our CSR performance is driven by strong leadership that advances our commitments, priorities and cross-functional collaboration to manage impacts, risks and opportunities through our daily operations and practices. At Thermo Fisher, we view CSR as everyone's responsibility, and it is deeply embedded in our operating model.

## **CSR** governance Our Mission is to enable our customers to make the world healthier, cleaner and safer **Board oversight** Nominating Science and Strategy and and Corporate Compensation **Technology Audit Committee** Finance Committee Governance Committee Committee Committee **Management and implementation** Chairman, president and CEO Company leadership team **Executive oversight committees** Core teams Global businesses Centers of excellence Working groups Communities of practice and colleagues

For our Corporate By-Laws, Code of Business Conduct and Ethics, Corporate Governance Guidelines, Board of Directors and Board Committees and other corporate governance information, please visit our Investor Relations page.

## Regulatory

#### **UK** tax policy

Thermo Fisher, in accordance with our Code of Business, Conduct and Ethics, publishes its tax strategy to adhere to UK legislative requirements.

Thermo Fisher UK Tax Policy

#### **UK Pension Investment Strategy and Governance**

A Statement of Investment Principles (SIP) is a regulatory requirement for U.K. occupational pension schemes. However, more importantly, it is a clear statement of how the Trustee will manage the Scheme's investments, setting out the Trustee's investment principles that govern its decisions about investments. The SIP must set out the Trustee's policies on how assets are invested, including in regards to social, environmental and governance considerations, and how investment risks are measured and managed. It is reviewed by the Trustee at least every three years or after any significant change in the investment approach or membership demographic.

The Trustee is required to make the SIPs publicly available and you can access them here:

Fisher Scientific UK Limited Pension Scheme

Life Technologies UK Retirement Benefits Scheme

The Oxoid Pension Scheme

Patheon UK Pension Plan

Thermo Fisher Scientific Pension Scheme

DB Pension Scheme Defined Contribution Governance Statement

PPD Statement of Investment Principles

Binding Site Statement of Investment Principles

Binding Site GDPR Privacy Notice

#### **Engagement Policy Implementation Statement**

On 6 June 2019, the U.K. Government published the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 (the "Regulations"). The Regulations require that from 1 October 2020, trustees of defined benefit pension schemes, defined contribution pension schemes, or hybrid schemes that provide both defined benefit and defined contribution benefits produce an Implementation Statement. The Implementation Statement must include:

- A summary of the changes made to the Statement of Investment Principles ("SIP") over the scheme year
- Evidence on how pension scheme trustees have fulfilled the objectives and policies included in the SIP over the scheme year
- A description of the voting behavior by, or on behalf of the trustees (including the most significant votes cast) during the scheme year and state any use of third-party proxy voting services

The Trustee is required to make the Implementation Statements publicly available and you can access them here:

- Fisher Scientific UK Limited Pension Scheme
- Life Technologies UK Retirement Benefits Scheme
- The Oxoid Pension Scheme
- Patheon UK Pension Plan
- Thermo Fisher Scientific Pension Scheme
- Binding Site Implementation Statement
- PPD Implementation Statement

## **Gender Pay Reporting**

Thermo Fisher recognizes legislative requirements in the UK, France and Ireland to publicly disclose gender pay gap on an annual basis. The most recent reports are accessible below:

- UK Gender Pay Gap Report 2024
- France Gender Pay Gap Report 2023
- France Gender Pay Gap Report FR 2023
- Ireland Gender Pay Gap Report 2024

See our Reporting hub for historic reports.

CORPORATE SOCIAL RESPONSIBILITY

6

## **Ethics**



## Code of Business Conduct and Ethics

Our values are represented in the Thermo Fisher Code of Business Conduct and Ethics (the Code), which defines our expectations for all colleagues to adhere to these practices and comply with all applicable laws and regulations. The Code covers a broad range of topics, including policies related to ethical decision-making, working together respectfully, conflicts of interest, honest and ethical fair dealing, bribery and improper payments, insider trading, responsible use of resources, export control awareness, human rights, privacy matters and accuracy of records.

Stand-alone policies governing these critical topics help to expand our colleagues' understanding, set expectations and provide more detailed guidance on topics such as anti-corruption and anti-money laundering, antitrust, banking, environmental health and safety, human rights and equal employment opportunity, export/import controls, responsible use of technology, global data privacy and records management.

All directors and colleagues are responsible for certifying annually that they have reviewed and are following the Code. Additionally, all colleagues participate in annual training on specific Code elements to understand how they apply to their role. The Code and its related trainings are translated and available in 21 languages for our global team, including all colleagues and contingent workers.

#### **Ethical business practices**

Thermo Fisher has designed and implemented an internal control environment to prevent and detect bribery and corruption. Risk assessments help identify potential areas of concern, and policies, procedures and training programs are in place to raise awareness among colleagues. In 2024, our annual Compliance Week program covered a wide range of topics, including privacy, government contracts, anti-bribery and anti-corruption, healthcare and global trade compliance.

## **Anti-corruption**

To protect our reputation and right to operate in jurisdictions around the world, our Global Anti-Corruption Policy frames our anti-corruption program and applies to everyone at Thermo Fisher as well as our business partners. It is available in multiple languages and provides a framework for colleagues, promoting effective compliance with these laws and emphasizing the prohibition of bribery and corruption in any form. We design, implement and operate stringent controls to prevent and detect bribery, mirroring the commitment observed in various legal frameworks. The effectiveness of our company compliance programs, including annual training, internal controls and an investigations framework for evaluating and remediating potential violations, aligns with the growing emphasis on preventing improper payments. Additionally, Thermo Fisher complies with the U.S. Foreign Corrupt Practices Act of 1977 (FCPA), as amended, the U.K. Bribery Act 2010 (UK Bribery Act) and all applicable anti-corruption laws, both domestically and internationally.

#### **Partner expectations**

Our commitment to anti-corruption extends beyond our organization. Third-party compliance is a critical aspect of our approach that requires suppliers and distribution channel partners to adhere to the same rigorous anti-corruption standards we uphold internally. Our due diligence processes play a vital role in identifying and managing potential corruption risks, thus fostering a culture of ethical business practices throughout our supply chain.

## **Human rights**

We are committed to upholding and respecting human rights by conducting business to the highest ethical standards and in compliance with applicable laws and company policy. Thermo Fisher's Global Human Rights Counsel is responsible for leading the coordination of our human rights program across all businesses. This includes expanding training offerings, which will further improve awareness, compliance and adherence to governing principles and ethical and legal codes.

As a part of our continued commitment to enhance our human rights due diligence practices, we conduct in-depth human rights risk assessments of our operations and supplier network in compliance with the latest regulatory requirements. In 2024, we initiated the expansion of our third-party due diligence assessments for launch in 2025 to include targeted questions on labor and human rights topics for our distributors. With the oversight of leadership committees embedded in our enterprise Corporate governance model, our process enables regular monitoring of human rights matters and increased reporting capacity to meet the disclosure requirements of country-specific modern slavery, human rights and supply chain due diligence acts in jurisdictions where we operate.

Our supplier expectations and due diligence program are detailed in the Responsible sourcing section.

#### **Guiding principles**

We are guided by the principles set forth in our Human Rights and Equal Opportunity Policy, which establishes our standards for business conduct related to respecting human rights and fair labor practices across our global operation. This 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.

In line with our human rights framework, we seek to identify and assess adverse human rights impacts that may be linked to our operations, products, services or business relationships. As informed by the implementation guidance from the OECD Due Diligence Guidance for Responsible Business Conduct, we strive to prevent, mitigate, provide remediation for, and track the progress of identified impacts.

## **Engaging our stakeholders**

We engage transparently and collaboratively with our stakeholders to help ensure the effectiveness of our human rights program. Our Code of Business Conduct and Ethics outlines the requirements for all directors and colleagues within the company, and our Supplier Code of Conduct defines our compliance expectations for suppliers and their subcontractors. For customers, resellers and distributors, we provide training, education and resources to help them use our instruments and products as designed and to follow global scientific and ethical standards for the responsible selling or reselling of our technologies. We monitor best practices through external engagement with human rights peer networks.

We also engage with governments, regulators and nongovernmental organizations to contribute to good global policy, such as the responsible application of technology and appropriate security protocols and procedures for safeguarding individual privacy rights.

Active engagement and feedback from our partners supports the continuous improvement of our approach. If, at any time, a stakeholder has a human rights concern, they have the option to contact our Global Ethics Hotline and can submit a report anonymously, if desired.

#### **Compliance and accountability**

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, including through periodic internal reviews of our systems and controls. The company policies that touch on our ethical and human rights principles, standards and practices are provided in up to 15 languages.

In 2024, we expanded our human rights trainings in line with increasing regulatory requirements and stakeholder expectations globally. With tailored offerings, we better equip our colleagues with the knowledge and skills required to uphold our human rights commitments in the regions where we operate. For example, procurement colleagues receive training specific to the expectations of our responsible sourcing program, including labor and human rights for workers in the supply chain.

More information on how we operationalize our commitment to human rights is available in the Responsible sourcing section.

## **Bioethics**

As science advances at an unprecedented pace, we continually focus on the ethical and social issues that relate to our role in biotechnology and biomedical research. We value the importance of identifying, assessing, tracking, managing and overseeing bioethics matters, policies and practices.

Our procedures reflect careful consideration throughout our research, development, manufacturing, sales and distribution processes to prioritize the safety and efficacy of our products. We strive to operate in a way that is consistent with global best practices and ethical principles, including through:

- Our Code of Business Conduct and Ethics
- Appropriate local, national, regional and international governing bodies
- Standards found in guidelines for Good Laboratory Practices (GLP), the Belmont Report for Ethical Principles and Guidelines for the Protection of Human Subjects, Helsinki International Ethical Guidelines for Biomedical Research Involving Human Subjects and applicable privacy and data protection standards

#### **Bioethics Committee**

Our bioethics framework is monitored and managed by the Thermo Fisher Bioethics Committee, which is comprised of senior leaders who report regularly to our chairman, president and CEO.

## **Bioethics Committee**

**Executive VP** 

Chief medical officer

Clinical research leadership

VP and chief communications officer

SVP and general counsel

Genetic sciences leadership

Chief scientific officer

VP, intellectual property

Dedicated to the socially responsible use of biotechnology to improve and save lives, the Bioethics Committee works to ensure we satisfy transparent, compliant and ethical business practices and standards with unyielding integrity throughout our value chain. The committee defines, articulates and regularly reviews our corporate policies and positions on current and emerging bioethics topics, considers feedback from our stakeholders and key opinion leaders in the scientific community, and provides updates to the Science and Technology Committee of the Board.

If we receive an ethical question or concern regarding how customers may be using our technologies, the Bioethics Committee is immediately engaged. Following an investigation, the committee determines the course of action in accordance with our values, codes and policies. Examples of past remedial actions have included ceasing the sale of a product to certain customers, engaging with law enforcement and regulatory authorities and implementing enhanced safeguards and controls.

## **Healthcare Code of Conduct**

Thermo Fisher's Code of Conduct on Interactions with Healthcare Professionals (Healthcare Code of Conduct) serves as a comprehensive guide for ethical practices in the healthcare industry. Developed in alignment with the AdvaMed™ Code of Ethics on Interactions with Healthcare Professionals, along with other industry guidance and federal, state and regional laws, the Healthcare Code of Conduct helps ensure that our colleagues adhere to the highest standards of integrity and transparency. Our colleagues receive training and education annually, at a minimum, on relevant topics to remain compliant.

Thermo Fisher has adopted policies and procedures to address Healthcare Code of Conduct violations which can lead to disciplinary action up to and including termination. As the U.S. Department of Health and Human Services (HHS) Office of Inspector General (OIG) guidance recognizes, however, the implementation of such a program cannot guarantee the elimination of improper conduct. It is Thermo Fisher's expectation that all employees will adhere to our compliance program as well as with all applicable laws, regulations and policies.

## Responsible sales and marketing

As the world leader in serving science, Thermo Fisher recognizes that it plays an important role in the life sciences, healthcare, the environment, and public safety. Accordingly, we are committed to complying with federal policies and guidance related to the products and services we offer. For example, in April 2024, the White House Office of Science and Technology Policy (OSTP) published its Framework for Nucleic Acid Synthesis Screening, which requires nucleic acid synthesis providers to implement biosecurity and information security measures, including the following:

- Retaining records relating to orders for synthetic nucleic acids.
- Screening orders for synthetic nucleic acids to identify sequences of concern (SOCs).
- Verifying with customers the need for synthetic nucleic acids with SOCs.
- Reporting potentially illegitimate purchase orders of synthetic nucleic acids involving SOCs to the relevant authorities.

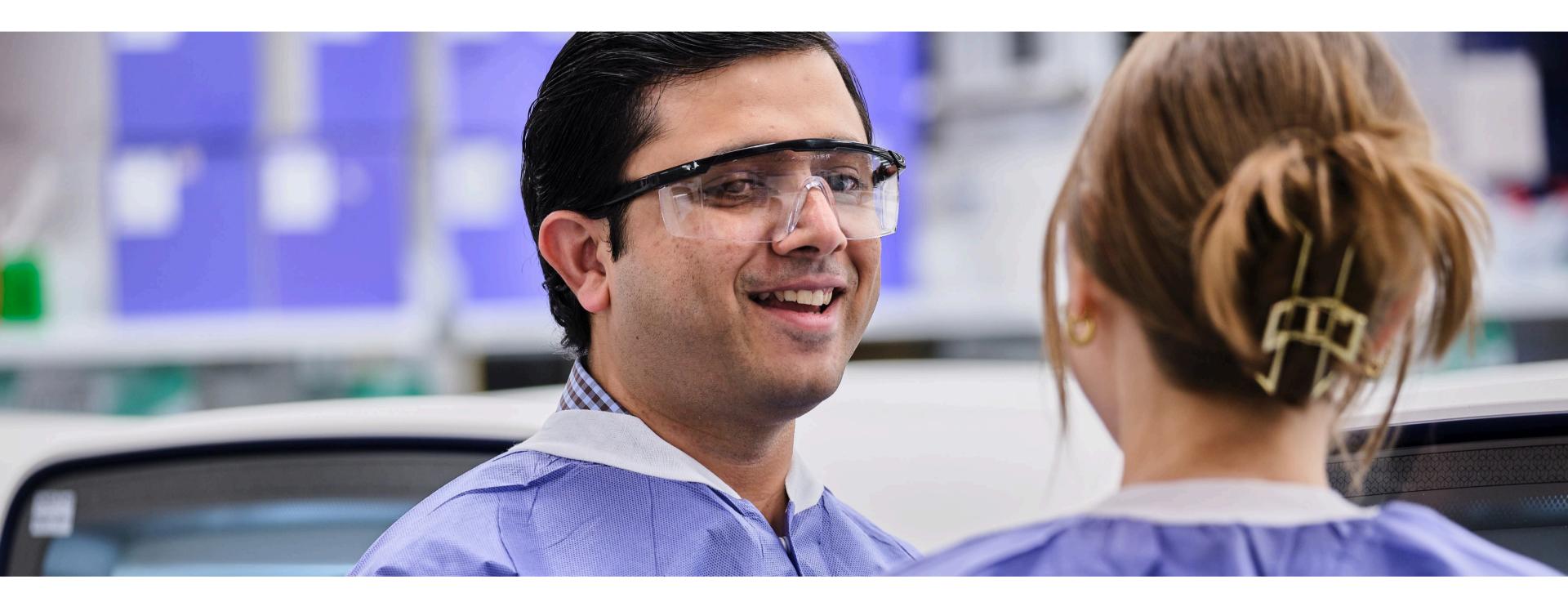
Thermo Fisher's sales practices, product descriptions and marketing practices must always be fair, accurate and consistent with product labeling. Promotional claims must be based on valid scientific evidence and provide accurate, objective and complete information about the product. We must never promote our products for uses that have not been approved by the appropriate regulatory authority, if approval is required. Thermo Fisher believes in and practices fair trade by not prohibiting our customers or suppliers from dealing with any of our competitors as a condition of obtaining products and services from us, nor do we enter into tying arrangements where a customer is required to purchase one product in order to receive a second distinct product (provided, however, sometimes we do offer a package price for bundled products or services which can also be purchased separately). The promotion of medical devices and diagnostic products is subject to strict regulation around the world, including by the Food Drug & Cosmetic Act, Anti-Kickback Statute and the Physician Payments Sunshine Act (and similar international regulations). Thermo Fisher employees whose transactions are subject to these regulations receive regular trainings on these topics to ensure their understanding of what is required both by the regulations and by the Thermo Fisher Healthcare Code of Conduct. For additional information on ethics and compliance, including trainings and our Healthcare Code of Conduct, please see the above sections.

#### Endnote:

<sup>1.</sup> This indicator is calculated based on the number of ethics and compliance courses completed out of the number of ethics and compliance courses assigned to all colleagues.

# Reporting a concern

We strive to provide a secure atmosphere for colleagues, customers, suppliers and workers in the supply chain, and other third parties to report any concerns. Everyone is encouraged to do their part to maintain our high standards for ethics and integrity. If any stakeholder believes a violation of law, the Code of Business Conduct and Ethics, or any company policies or procedures has occurred, we encourage them to promptly report the matter.



## **Global Ethics Hotline**

We aim to provide an easy-to-use, reliable and anonymous communication tool to report any issues, concerns or violations of law or company policies in a safe and confidential manner. Every person has free, unlimited access to our anonymous and confidential incident reporting system, www.GlobalEthicsHotline.com, which is operated by a third-party. It is available to colleagues, customers, suppliers and other external stakeholders to raise concerns related to any issue, observed or suspected, including a product, quality, environmental or workplace concern.

You may use the Global Ethics Hotline to report any concern, including but not limited to:

- Accounting/Audit related concerns
- Financial misconduct
- Conflict of interest
- Theft or fraud
- Policy violations
- Quality concerns
- Environmental issues
- Human rights issues
- Safety concerns
- Substance abuse
- Discrimination
- Bullying or harassment
- Sexual harassment
- Violence or threat of violence
- Other human resources issues
- Retaliation

The hotline staff, together with members of our legal team, review and investigate reports and take appropriate action. Escalation and resolution processes differ depending on the type of issue raised. Any concerns and complaints related to accounting or auditing are also reported to the Audit Committee of the Board.

#### **Confidentiality**

Callers to the Global Ethics Hotline may remain anonymous. Any information provided through any of our reporting channels will be treated confidentially. In some instances, if an investigation is needed, information may be shared on a need-to-know basis. Thermo Fisher may be required by law to report certain types of activities.

### **Retaliation is prohibited**

Thermo Fisher does not tolerate retaliation against anyone who reports a concern in good faith, nor do we tolerate retaliation against anyone who participates in an investigation.

We are deeply committed to doing business the right way and strive to provide an environment in which colleagues and other stakeholders feel safe and encouraged to raise issues so we can work together to resolve them. To cultivate a supportive and transparent reporting culture, we regularly assess colleague sentiment and review the degree to which colleagues feel empowered to report their concerns.

## If you are an employee:

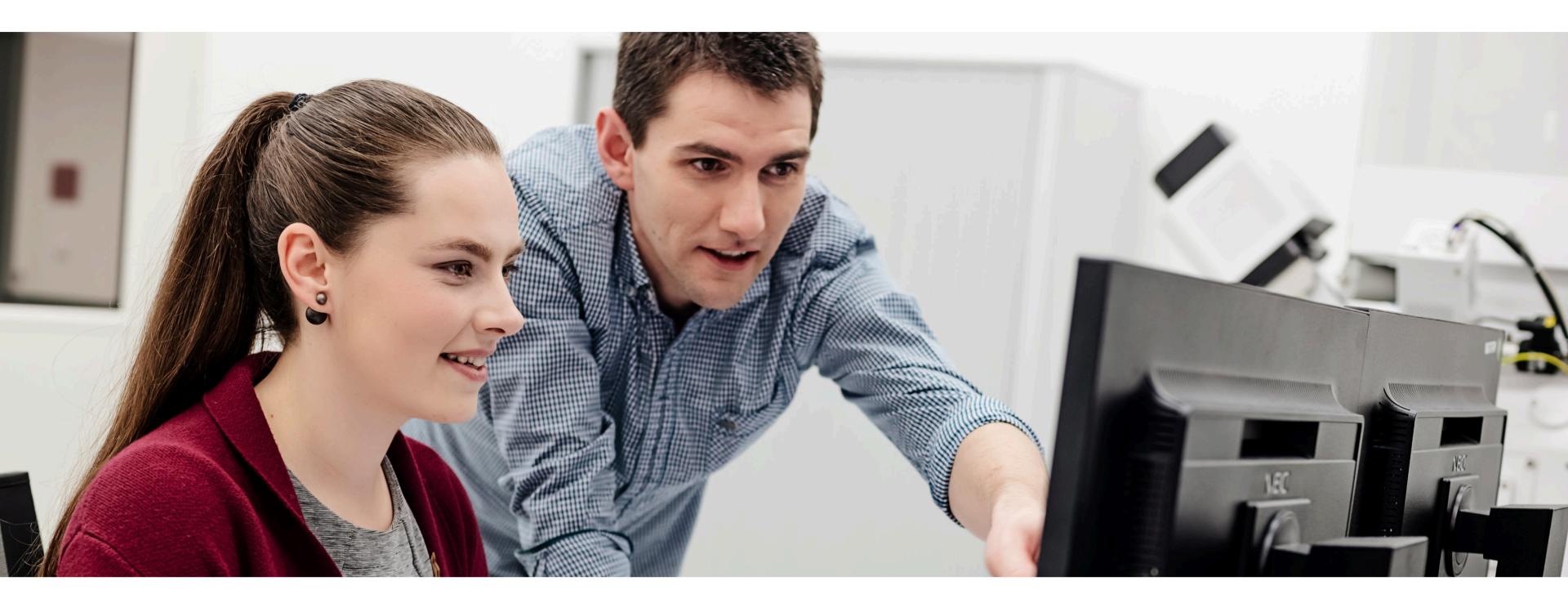
- Discuss the issue with your manager or supervisor
- Contact our Global Ethics Hotline at www.GlobalEthicsHotline.com
- Discuss the issue with the Human Resources department
- Talk to any other member of management

#### If you are external to Thermo Fisher Scientific:

 At any time, you may contact our Global Ethics Hotline at www.GlobalEthicsHotline.com

# Data privacy and security

We believe every colleague is responsible for safeguarding data and maintaining the trust our customers place in us.



## Data privacy

As a company engaging in the ethical collection, use, management and safeguarding of personal data, our global privacy program is designed to maintain adherence with core data privacy principles and to protect the fundamental rights and freedoms of any individuals, or data subjects, who entrust us with their information. These data subjects can include our colleagues, customers, patients, suppliers, business partners and visitors to our websites.

Our Global Privacy Notice outlines how we handle any information that can directly or indirectly identify an individual. It is continually reviewed for compliance with applicable laws and regulatory guidance in jurisdictions where we operate. In addition, all colleagues are regularly trained and re-certified on our policies and applicable data protection laws.

For effective implementation of our global policies and standards, our privacy Centers of Excellence (CoEs) support our businesses in collecting and handling data in a manner that protects our colleagues, customers and other data subjects. We apply the widely recognized Privacy by Design framework to our program, proactively incorporating privacy into the design and operation of information technology (IT) systems and networked infrastructure and business practices. For comprehensive program monitoring, our privacy management platform is used to document legal and compliance activities, including privacy assessments and investigations, contract reviews, individual rights requests and relevant due diligence of third parties.

## Cybersecurity

Our commitment to cybersecurity emphasizes the use of a risk-based, "defense in depth" approach to assess, educate, block, identify, respond to and recover from cybersecurity threats. Recognizing that no single technology, process or control can effectively prevent or mitigate all risks, we incorporate cybersecurity into our overall risk management process. We employ a suite of technologies, processes and controls, all working independently and as part of a cohesive strategy, to manage or reduce risk.

Our cybersecurity program has earned an ISO 27001 certification, a globally recognized and annually renewed standard for information security management systems. Our program assists in the management of risks associated with the confidentiality, integrity and availability of data and systems both within the company environment and for our products and services effectively support our business objectives and customer expectations. We seek to routinely refine our cybersecurity approach to adapt to changes in the threat landscape and manage emerging security risks.

To reinforce vigilance and raise awareness of cybersecurity threats, we regularly educate and share best practices with our colleagues. Our training program includes frequent exercises, periodic cyber event simulations and annual attestation to our Technology Acceptable Use Policy.

More information on cybersecurity governance and risk management is available in our Annual Report on Form 10-K.

## Artificial intelligence

The use of artificial intelligence (AI) continues to evolve and has the potential to advance our Mission and deliver value for our customers and colleagues.

Our AI and machine learning (AI/ML) is overseen by our AI Leadership Committee. Our Generative AI CoE, which comprises cross-functional leaders, advises on strategy, regulation, policies and frameworks. In addition, our Bioethics Committee continues to monitor the evolving landscape and technological implications of AI/ML.

We have long harnessed Al/ML in our products and services. Our approach ensures solutions are designed, implemented and used fairly, ethically and safely. This includes the responsible use of data for model development and training as outlined in our Responsible Al (RAI) framework, which is underpinned by our global RAI policy, aligns Al use to our Mission and strategy and guides colleague conduct to manage Al-related risks.

Our internal generative Al platform, introduced in 2023, has the flexibility to support multiple large language models today and will support other functionality in the future. As we strive for thoughtful and ethical Al use, we are optimistic these technologies can continue to enable colleague success that accelerates high-impact innovation and strengthens our customer value proposition.

## About this content

Our Corporate Social Responsibility (CSR) website reflects our commitment to society and our stakeholders, and details our progress on relevant priorities. It is regularly updated to feature the latest on our CSR programs, achievements and performance.

In 2024, we completed the acquisition of Olink Holding AB (publ) ("Olink"), a provider of leading solutions for advanced proteomics discovery and development. This content and data is inclusive of all Thermo Fisher Scientific entities, including Olink Proteomics AB (559046-8632) and Phadia AB (556041-3204).

All 2024 data covers the period from January 1 to December 31, 2024 and can be found aggregated in our Data summary. For select environmental performance indicators, our company's third-party auditor has provided independent external assurance. Assured data is clearly marked in the Data summary, and a copy of the assurance statement is available in our Reporting hub providing details on the assurance scope, standards used, work undertaken and conclusions.

For questions or comments regarding this content or our CSR strategy, please contact us at sustainability@thermofisher.com.

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ACT. The ACT Ecolabel is a trademark of My Green Lab. AdvaMed is a trademark of Advanced Medical Technology Association. DuPont is a trademark of DuPont Specialty Products USA, LLC. ENERGY STAR is a registered trademark of the U.S. Environmental Protection Agency. Innovation Nation is a trademark of The Edison Institute. Junior Innovators Challenge is a trademark of the Society for Science & the Public. Project HOPE is a trademark of Project HOPE-The People-to-People Health Foundation, Inc. Responsible Minerals Initiative is a trademark of Responsible Business Alliance, Inc. RightCycle is a trademark of Kimberly-Clark Worldwide, Inc. Society for Science is a trademark of Society for Science & the Public. Science Based Targets Initiative. Tyvek is a trademark of DuPont Safety & Construction, Inc. World Economic Forum is a trademark of World Economic Forum