



## **THERMO FISHER SCIENTIFIC INC: MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021**

Thermo Fisher Scientific is fully committed to acting ethically and with integrity, combatting slavery and human trafficking across our global operations.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the reporting requirements under the Australian Modern Slavery Act 2018 (Cth) (the "Acts") and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2021. It is intended to provide our customers, stakeholders and investors with information on the systems and controls that we implement to ensure slavery and human trafficking is not taking place in our supply chain.

Our previous Modern Slavery and Human Trafficking statements are available [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 the Acts and in particular its UK and Australian subsidiaries listed in the [Appendix](#).

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.

On December 8, 2021, the company acquired PPD, Inc., a leading global provider of clinical research services to the pharma and biotech industry.

Following the acquisition, the PPD group is in the process of being integrated into Thermo Fisher with the aim of consolidating group policies in the area of supply chain management, risk management, and employee training to support responsible business practices and further mitigate modern slavery risks. Due to the timing of the acquisition (December 8, 2021), PPD Global Ltd and Synexus Clinical Research Ltd ('PPD') have published separate Modern Slavery Statements for the financial year ending 31 December 2021<sup>1</sup>. Click [here](#) for PPD Global Ltd and [here](#) for Synexus Clinical Research Ltd.

For more information, please visit [here](#).

### **Our Policies**

Thermo Fisher Scientific is committed to ensuring that we conduct our global business with respect for human rights and in compliance with applicable laws and fair labor practices, as evidenced by the following policies:

- [Code of Business Conduct and Ethics](#)
- [Global Equal Employment Opportunity and Human Rights Policy](#)

---

<sup>1</sup> Starting from financial year 2022, PPD will be included in Thermo Fisher's statement.

- [Supplier Code of Conduct](#)
- [Conflict Minerals Statement](#)

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

Thermo Fisher Code of Business Conduct and Ethics (the “Code”) applies to all Thermo Fisher employees and sets forth our commitment to conduct business with the highest ethical standards and to comply with all applicable laws and regulations.

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 Thermo Fisher’s Code of Business Conduct or other illegal or unethical behaviour.

We offer a number of resources such as our confidential 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 Ethics Hotline is available to all employees to raise all forms of concern they may have, anonymously if requested, including those relating to human rights issues. Therefore, if there are any concerns these can be raised in confidence and without fear of retaliation.

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

## **Our Supply Chain**

Through our supply chain, we source components that are used both at Thermo Fisher Scientific facilities and by our external partners to manufacture our products. We purchase goods and services from thousands of suppliers around the globe. As a result, our supply chain is global and complex.

Thermo Fisher Scientific expects suppliers to treat their employees with dignity and respect and to comply with all legal and regulatory requirements pertaining to the fair treatment of employees. 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.

Thermo Fisher Scientific has four key corporate values - Integrity, Intensity, Innovation, and Involvement. These four values form the foundation of our business. We believe shared values are the cornerstone of supplier relationships, therefore, we expect that our suppliers and their subcontractors hold these same values and act fully in compliance with our Supplier Code of Conduct.

More information about our supply chain can be found [here](#).

## **Supplier Code of Conduct**

Our Supplier Code of Conduct outlines expectations that we have for all of our suppliers. These are in line with our corporate values 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;
- compliance 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 taking appropriate health and safety measures, acting in an environmentally responsible manner and commitments to diversity and inclusion).

We reserve the right to audit suppliers on all elements of their compliance with the Supplier Code of Conduct and to terminate a business relationship if it is determined that a supplier is in violation.

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

We have robust supply chain due diligence and audit processes in place as part of our corporate commitment to supply chain compliance and, in particular, responsible sourcing of materials used in our products. Further details are available for review [here](#).

In 2021, we conducted detailed risk assessments, working with our Global Sourcing function and a third-party partner, Assent Compliance Inc. (“Assent”), to identify the suppliers that we believe are exposed to the highest risk of modern slavery and human trafficking.

In 2021, we retained general focus on reviewing, via Assent, suppliers in countries which, according to the [Global Slavery Index](#), have high rates of forced labor practices. We focused specifically on significant suppliers in Asia-Pacific and India. In these higher risk countries, we conducted diligence utilizing the Slavery and Trafficking Risk Template (“STRT”). This is a standard template that was created by the Social Responsibility Alliance and is used by more than 10,000 companies as part of their supplier governance programs. More information on the STRT is available [here](#).

We also expanded our diligence processes for suppliers to our Fisher Scientific business, a sales channel for a large number of third-party manufacturers as well as our internally manufactured products. Fisher Scientific worked during 2021 to ensure a targeted approach to higher risk supplies. By way of example, when procuring higher risk PPE products (including nitrile gloves) in regions with higher risk for forced labor, for which there was increased demand during the COVID-19 pandemic, Fisher Scientific mandated the provision of documentary evidence substantiating that the manufacturing locations utilized for the products in question were properly operated in accordance with International Labor Organization Standards.

In addition to diligence efforts led by Assent and our Global Sourcing function which specifically target higher risk jurisdictions and categories of product, we employ EcoVadis SAS (“EcoVadis”) to assess the ethics, environmental practices and labor and human rights status of direct suppliers across the world with whom we have a material spend. This initiative will see EcoVadis target the top 80% of our direct sourcing spend by 2025. While not uniquely focused on forced labor, we are able to obtain useful indicators of responsible practices via this diligence. In 2021, all suppliers participating in the EcoVadis program from high risk geographies were screened on the Labor and Human Rights theme, with no high-risk findings.

### **Training**

Compliance training is regularly undertaken by all employees. All directors, officers and employees of Thermo Fisher Scientific are also responsible for reviewing the Code and confirming annually that they will comply. In addition, all employees are given annual training on specific Code elements to ensure they have a complete understanding of what is expected of them.

Furthermore, as part of procurement training on a sustainable supply chain we reinforce the importance of understanding the risks of modern slavery and human trafficking in our supply chains and our business. We also require our business partners to provide training to their own staff, suppliers and providers.

### **Our effectiveness in combatting Slavery and Human Trafficking**

In order to maintain and continually improve supplier and subcontractor performance we:

- share best practices and work with our key suppliers and subcontractors to eliminate or reduce supply chain risks;

- have implemented a set of guidelines for suppliers and subcontractors, which address social and environmental issues such as child labor, slavery and human trafficking, freedom of association and hazardous substances; and
- monitor and work to improve supplier diligence response rates via targeted initiatives.

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 "Michael A. Boxer". The signature is written in a cursive style with a large, prominent initial "M".

**Michael Boxer**

**Senior Vice President and General Counsel**

## 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

### 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 Pty Ltd
Thermo Trace Pty Ltd
Thermo Fisher Scientific Australia Pty Ltd
Lomb Scientific (Aust) Pty Ltd
Dionex Pty Ltd
Life Technologies Australia Pty Ltd
Microgenics Diagnostics Pty Ltd

Technology Design Solutions Pty Ltd
-------------------------------------

App-tek International Pty Ltd
-------------------------------

Patheon Biologics Australia Pty Ltd
-------------------------------------