

# **Promega Modern Slavery Act Statement**

Modern slavery is a crime and violation of human rights. It takes various forms, such as slavery, servitude, human trafficking and forced labor, all of which have in common the deprivation of a person's liberty by another to exploit him or her for personal or commercial gain.

Promega Corporation and its affiliates ("Promega") have a zero-tolerance approach to modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings worldwide. We are committed to putting effective systems and controls in place to safeguard against modern slavery taking place in our business or supply chain.

This statement sets out the steps that we take to ensure that modern slavery is not taking place in our business or supply chain.

#### **Business**

Promega Corporation is a worldwide leader in applying biochemistry and molecular biology to the development of innovative, high-value products for the life sciences. With a portfolio of more than 4,000 products covering the fields of genomics, protein analysis and expression, cellular analysis, drug discovery, and genetic identity, we support life scientists in academic, industrial, and government settings. Since its founding in 1978, Promega has consistently integrated the values of corporate responsibility into all aspects of our corporate culture and activity.

Promega Corporation is headquartered in Madison, WI, USA with branches in 16 countries and more than 50 global distributors.

### **Policies**

As a member to the UN Global Compact, Promega has zero tolerance for violations of human rights. We are committed to upholding and advancing the Universal Declaration of Human Rights. The following policies, available at www.promega.com, reflect these commitments and ensure that we are conducting business in an ethical and transparent manner:

- <u>Corporate Responsibility Report</u>. Our Corporate Responsibility Report evinces Promega's commitment to conducting its business in a sustainable and ethical manner. It explicitly condemns modern slavery and exploitative child labor.
- <u>Code of Conduct</u>. Our Code of Conduct outlines Promega's expectations for its employees.
   It reflects our commitment to act ethically and with integrity in all our business relationships.
   Promega employees are required to comply with this policy and receive annual training on it.
- <u>Supplier Code of Conduct</u>. Our Supplier Code of Conduct outlines Promega's expectations
  that its suppliers comply with all applicable laws and ethical practices for labor, health and
  safety, and the environment. This policy specifically prohibits suppliers from engaging in any
  form of forced, bonded, indentured, or compulsory labor. Upon Promega's request, suppliers
  must certify that they comply with all laws on slavery and human trafficking. Purchase
  orders submitted to, and agreements with, suppliers incorporate this policy.
- <u>Channel Partner Code of Conduct.</u> Our Channel Partner Code of Conduct outlines Promega's expectations for its business partners, including consultants, distributors, and agents. It requires that our business partners conduct their business with the highest ethical

standards and comply with all applicable laws, rules, and regulations. Upon Promega's request, Channel Partners must certify that they comply with all applicable labor laws and regulations, including but not limited to those pertaining to slavery, human trafficking, and child labor. Agreements with consultants and distributors incorporate this policy.

Promega maintains an Integrity Hotline that is available to all employees, suppliers, and channel partners to raise concerns, anonymously if requested, regarding any observed or suspected violation of the above policies. Promega investigates allegations of misconduct and potential violations of its policies. Violations can lead to disciplinary actions, including where applicable, termination of employment or termination of agreements or relationships with suppliers and channel partners.

Promega also maintains a Compliance Committee that provides guidance and oversight for the company's corporate compliance program. The Compliance Committee reports to the Audit Committee of Promega's Board of Directors.

## **Suppliers**

Promega purchases goods and services from suppliers around the globe to manufacture its products. Promega is committed to implementing effective systems and controls aimed at ensuring that modern slavery is not taking place in our supply chains.

Promega's relationship with many of its suppliers have been established for some time and are built upon mutually beneficial, collaborative business endeavors. When we on-board new suppliers, we pre-approve them through due diligence, which may include inquiry into company performance and references from other customers to establish reputation and suitability. All suppliers are also subject to audits to ensure their continued compliance with Promega's expectations and applicable laws, rules, and regulations.

To date, we are not aware of any modern slavery activities within our supply chain. However, if we were to learn of any such activities, we would act immediately in accordance with our obligations.

### **Ongoing Efforts**

Promega will continue to review and improve its practices and policies to prevent, identify and/or eliminate modern slavery from our business.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015, Section II (14) of the Australian Modern Slavery Act 2018, and the California Transparency in Supply Chains Act of 2010, and constitutes Promega's modern slavery statement for the financial year ending March 31, 2022. It specifically addresses any disclosure obligations of Promega UK Limited and Promega Australia. This statement is approved by the Promega Board of Directors.

William A. Linton

Chairman and Chief Executive Officer

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