



Supplier Code of Conduct

(Excerpts from the Procurement and Supplier Quality Guidebook)

Overview

Hologic is guided by our purpose, our passion and our promise. Our purpose is to enable healthier lives everywhere, every day. Our passion is to champion women's health globally. Our promise is The Science of Sure®, a commitment to provide healthcare professionals with clinically differentiated, high-quality products.

“As a company, we strive to exemplify the positive societal benefits private enterprise can drive in everything we do. We are committed to being a company that reflects the very best of our purpose, our passion, our promise, and our people. We hold ourselves accountable to these commitments and we extend the same expectations across our value chain around the globe. Accordingly, Hologic aims to partner with suppliers and business partners that strive to be good corporate citizens, practice environmental stewardship, and operate responsibly.”

– Ryan Wallace, Chief Procurement Officer

Purpose and Scope

The Procurement and Supplier Quality Guidebook communicate the quality requirements and commercial expectations Hologic has for new and existing suppliers of raw materials, components, sub-assemblies, original equipment manufacturers (OEM), contract manufacturers, hardware, software, service providers and distribution providers. Hologic conveys our requirements in our Code of Conduct, quality agreements/no-change quality agreements, contracts, purchase orders, product specifications, SOWs (statements of work) or other controlled documents.

We understand that our business units may have unique quality requirements, however, the processes and tools described in this guidebook represent the core expectations for Supply Chain Quality Management (SCQM). Any differences that our suppliers may encounter should be minimal and driven by specific product requirements.

The guidebook's purpose is to:

- Build strong partnerships with strategic suppliers so together we can provide lifesaving and life-changing health solutions to patients worldwide.
- Ensure our partners comply with all applicable regulations, directives, and standards.
- Ensure partners sustain an ongoing commitment to quality while executing customer-focused objectives.
- Enable a network of suppliers and partners that share our commitment to strong ethics, quality, sustainability, and global citizenship.



Hologic Code of Conduct

At Hologic and our affiliated companies, we are committed to operating in an ethical fashion, governed by the letter and spirit of the law.

Our [Hologic Code of Conduct](#) sets the foundation of our standards and expectations in our workplace and marketplace. Hologic complies with local workplace regulations and is committed to treating all stakeholders with respect and dignity. We hold our Suppliers to the same high standards of business conduct and environmental stewardship.

Our Code of Conduct is based on six values:

- **Honesty:** Being truthful and upfront with co-workers, customers, communities, suppliers, distributors and shareholders.
- **Integrity:** Delivering what Hologic promises and standing up for what is right.
- **Respect:** Treating each other with fairness and dignity and appreciating the unique abilities and strengths of each individual as well as the advantages of diversity.
- **Trust:** Building team spirit and confidence by communicating openly and honestly.
- **Responsibility:** Taking the initiative to speak up and report concerns regarding ethical conduct and seeking reliable guidance in cases of doubt.
- **Citizenship:** Following the laws of all the jurisdictions where Hologic does business.

We expect our Suppliers to:

- Comply with local laws and regulations
- Ensure a safe and healthy workplace
- Behave ethically and with integrity
- Uphold human rights and labor rights
- Embrace environmental sustainability and operate in a manner that reduces environmental impact
- Demonstrate social responsibility



Commitment to Social Responsibility

Hologic is committed to creating positive impact and we strive to exemplify the societal benefits private enterprises can provide. We are steadfast on our course to improve women's health while driving benefits for our stakeholders.

Health and Safety

Worldwide, we conduct our operations in a manner that protects human health and quality of life. This includes adherence to the letter and spirit of rules relating to labor standards and safe working conditions.

Hologic is committed to a safe and healthy work environment for all our employees, business partners and the communities where we operate.

- Suppliers must comply with applicable health and safety laws and regulations.
- Suppliers shall provide a safe and healthy work environment.
- Suppliers will provide a work environment free from violence and harassment of any kind that threatens, intimidates, or coerces another person.
- Suppliers shall make available safety information related to hazardous materials in the workplace and train employees on protection from hazards.
- Suppliers shall implement emergency response plans and procedures.
- Preference will be provided to suppliers that have health and safety management systems that are based on ISO 45001.

Human Rights and Labor Rights: Hologic is committed to respecting human rights and treating all stakeholders with respect.

Environment: Hologic is committed to integrating sustainability and environmental stewardship into our operations.

- Suppliers will comply with all applicable environmental laws, directives, and regulations.
- Suppliers will operate in an environmentally responsible manner and seek ways to minimize their impact on the environment.
- Suppliers are encouraged to set Science Based emission reduction targets and report progress.
- Suppliers are encouraged to reduce energy, water, and waste and report progress.
- Suppliers are expected to utilize recyclable or repurposed packaging wherever possible.
- Suppliers are encouraged to promote the purchase of sustainable products and services and promote sustainable product design and sustainable construction.



Supplier Practices

The following are key practices and performance criteria we require of all Hologic suppliers.

We look for suppliers that have the capability, competency, capacity and passion to continually improve and that strive to exceed all expectations of quality, delivery, sustainability, and cost.

1. **Supplier Compliance:** As a global company, Hologic complies (as applicable) with numerous standards, regulations, directives and laws in maintaining a Quality Management System (QMS). Our suppliers are required to follow these same regulations.
2. **Supplier Code of Conduct:** Hologic expects our suppliers to operate with the highest codes of conduct, particularly when it comes to adhering to the letter and spirit of any and all relevant laws, as noted below.
 - a. **General Principle:** Hologic suppliers' plants operate in compliance with the laws of their respective countries and with all other applicable laws, rules and directives.
 - b. **Environment:** Hologic suppliers' plants comply with all applicable environmental laws and regulations.
 - c. **Modern Slavery:** Modern slavery impacts over 40 million people worldwide. It takes many forms and the most common are human trafficking, forced labor and child labor or slavery. Hologic does not tolerate modern slavery. The same standards are expected from our business partners. Hologic supports the elimination of all forms of forced, bonded, indentured, involuntary prison labor, child labor, child slavery, and human trafficking. Hologic will not recruit child labor and condemns all forms of exploitation of children. Hologic will never knowingly use a supplier or business partner engaged in such activities.
 - d. **Wages and Hours:** Hologic's suppliers must set working hours, provide fair wages and any overtime pay in compliance with applicable laws. Suppliers will allow workers to choose freely whether to organize or join associations of their own choosing for collective bargaining, as provided by law or regulation.
 - e. **Discrimination:** Hologic's suppliers must hire, train, compensate, discipline and terminate workers based solely on their ability to do the job assigned, not their race, color, gender, ethnic or national origin, sexual orientation, religion, age, maternity or marital status, or any other trait not pertinent to their professional performance. Suppliers will prohibit discrimination, harassment, retaliation, and discrimination. Supplier will provide fair and respectful treatment and equal opportunity.



- f. **Anti-Corruption and Anti-Bribery; Gift Policy:** Hologic’s suppliers and employees do not accept gifts from persons or entities that deal with Hologic, particularly if accepting a gift could imply a conflict of interest, or if a gift exceeds modest value. Suppliers are required to comply with anti-corruption and anti-bribery laws in each country they conduct business with. Suppliers must follow local and internationally applicable laws and ethical standards and strictly prohibit bribes, kickbacks, illegal payments and any other offer of items of value that may inappropriately influence or reward the order, purchase, recommendation or use of products and services, whether provided directly or through a third party, such as a distributor, customs broker, or other agent. Suppliers must maintain proper financial books and records.

3. **Supplier Non-disclosure and Confidentiality:** All Hologic suppliers are required to sign and adhere to non-disclosure agreements. In addition, we expect suppliers to instruct their employees not to discuss any information relating to Hologic business that falls outside of their defined responsibilities. This includes (but is not limited to) any information concerning current or planned products, designs or volumes.

4. **Suppliers’ Use of Intellectual and Physical Property:** Designs (for equipment, tooling, processes, etc.), drawings, CAD data, test results, process sheets, validation protocols and data, and incoming inspection information that are provided to suppliers and/or developed by a supplier and paid for by Hologic are considered to be the property of Hologic. They must be safeguarded and transferred upon request. In addition, any use of Hologic’s assets or intellectual property for any purpose not related to Hologic products and/or operations requires prior written permission from Hologic. Suppliers may not display or use Hologic’s logo or any products or branding without prior written permission from Hologic.

5. **Supplier Notification:** Suppliers must notify Hologic in a timely manner (per quality agreement/no change quality agreement/terms and conditions) of any event that could impact the supply or quality of product.

Supplier notification is required for, but not limited to, the following:

- An FDA 483 or other warning letter. Hologic must be notified within 48 hours of letter receipt.
- Any change in ISO certification (i.e., loss, suspension, probation, expiration or major nonconformity)
- Changes that have a significant impact on the supplier’s quality management system (QMS).

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- Production process changes that affect location, material, design, manufacturing site and/or production specifications.
 - A major finding or issue identified by a federal, state, regional or local regulatory body, such as but not limited to: the U.S. Food and Drug Administration (FDA), the Environmental Protection Agency (EPA) or the Occupational Safety and Health Administration (OSHA).
 - A disruption to a physical facility that impacts production for more than 48 hours.
 - Financial conditions that could impact production, the ability to procure raw materials and/or the ability to continue operations.
 - Process control deviations that could affect production, quality and/or delivery.
 - A disruption of any raw material supply or product flow from a third-party supplier.
 - A workforce or management change that could affect production, quality and/or delivery.
 - A structural change to the supplier's company. For example, if the company is acquired or if it acquires another company.
 - A change in and/or relocation of a manufacturing site. Hologic must be notified in advance of such changes taking place.
 - A change in the transportation network impacting inbound delivery or outbound shipments.
6. **Business Continuity and Risk Management:** To prevent potential disruptions of supply, which can have a direct impact on our customers and their patients, we need to be confident that our suppliers (and their suppliers) have well-defined, properly documented business continuity plans to identify and mitigate supply chain risks.
7. **Supplier Diversity:** Hologic continuously assesses supplier diversity, both voluntarily and through a range of federal, state and local requirements that require us to track our use of suppliers within classifications such as Minority-Owned, Veteran-Owned and Woman-Owned.
8. **Supplier Invoicing and Pricing Negotiations:** To provide high value, quality and service levels to customers and patients, Hologic continuously improves the total cost of ownership with our suppliers. Suppliers will work in good faith to provide competitive contract terms and pricing consistent with that need. Suppliers are expected to meet the terms of agreements and purchase orders and provide timely and accurate invoicing.