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Corporate Global Trade Compliance Policy

Overview

Hologic, Inc. (Hologic) recognizes the importance of Trade Compliance in ensuring smooth and lawful international operations. Our Trade Compliance program focuses on two primary areas: Import and Export, each regulated by the respective government authorities in the countries we operate.

Import Compliance

Customs authorities in each country are responsible for overseeing the proper declaration of imported goods to ensure accurate duty collection and the protection of national security. Customs agencies also work in conjunction with other regulatory bodies, such as health agencies, to ensure that imported goods meet all applicable standards and regulations. Additionally, Customs enforces compliance with regulations related to forced labor and other mandates from relevant government agencies.

Export Compliance

Export activities are regulated by various agencies, including the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury, which enforces economic and trade sanctions. Similarly, the European Union's export control regime, governed by Regulation (EC) No 428/2009, aims to enforce foreign policy and national security objectives against foreign nationals and entities whose activities impact national security, foreign policy, or economic interests.

Policy Statement

Hologic is unwavering in its commitment to full compliance with all relevant trade regulations and laws. This includes adherence to U.S. Customs and Border Protection (CBP) regulations, the general rules set forth by the World Customs Organization (WCO), United States export control laws, and the equivalent laws in the countries where we operate.

Our steadfast dedication to these regulations not only enhances and protects U.S. national security but also promotes our business interests. This policy statement underscores Hologic's commitment to lawful conduct in all trade operations, ensuring that our practices meet the highest standards of legal and ethical compliance.

Global Trade Compliance Policy

Hologic maintains a strict policy of full compliance with all U.S. laws and the applicable laws in the countries where we operate, governing the importation, exportation, or re-exportation of merchandise, products, technology, and services. Employees must possess sufficient knowledge of these regulations to ensure their activities meet legal requirements. Non-compliance may result in disciplinary action, including dismissal.

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Export Compliance

- All exports must be accurately declared to relevant officials under the laws of the exporting country and any other jurisdiction involved.
- Shipping documentation must accurately describe the items being shipped, including applicable export classification and authorization.
- Hologic must have proper authorization to export or re-export items, or technology controlled by government regulations, including the Export Administration Regulations in the U.S. and the EU Export Control Regime. This includes intra-company and intra-country technology transfers to foreign persons, even if they are Hologic employees.

Import Compliance

- All imports must be accurately described to relevant officials under the laws of the importing country.
- Customs entries must accurately state all required information, including the importer of record's name and address, importer number, quantity, value, classification, duty preference, and country of origin for imported items.
- Hologic must have proper authorization to import items or technology controlled by government agencies, including but not limited to Customs and other regulatory agencies such as Health Authorities (e.g., FDA or other Health Ministries).

Sanctions Compliance

- Hologic shall not engage in transactions where the destination, end-use, or end-user is subject to a sanctions program, including those maintained by the U.S. Office of Foreign Assets Control, unless a specific or general license is obtained for that transaction.

Anti-Boycott Compliance

- Any request received by a Hologic employee to support a trade boycott must be reported to the global trade compliance team.
- The Director of Global Trade Compliance will assess whether such requests qualify as a boycott request and determine Hologic's ability to respond or comply.

Training and Resources

Hologic provides employees with access to policy and procedure manuals and offers appropriate training to ensure compliance. When necessary, technical guidance is sought from third-party Customs consultants, authorized Customs brokers, and CBP.

Reporting

Hologic employees should report any conduct they believe in good faith to be a violation or apparent violation of this policy to their supervisors or higher management, in accordance with local law. Any questions regarding this policy may be directed to the Global Trade Compliance Director.

Consequences of Non-Compliance

Violations of CBP regulations or U.S. export control laws can result in substantial fines for Hologic and potential collateral consequences, such as denial of import/export privileges or debarment from federal government contracts. Employees may also face civil or criminal fines and possible imprisonment. Therefore, these compliance obligations are taken very seriously.

Resources

Customs Authorities

- **US:** CBP
- **EU:** EU Customs
- **Costa Rica:** Costa Rica Customs
- **U.K.:** HM Revenue & Customs
- **Australia:** Australia Border
- **Japan:** Japan Customs
- **China:** China Customs
- **World Trade Organization Guidelines:** WTO
- **Anti-Boycott:** BIS Anti-Boycott

Sanctioned Countries and Parties

- U.S. Treasury Sanctions
- EU Sanctions

Forced Labor

- Uyghur Forced Labor Protection Act (UFLPA)
- Australian Federal Modern Slavery Act 2018
- International Labour Organization Global Standards
- UK Modern Slavery Act of 2015
- California Transparency in Supply Chains Act