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1. Preamble

QIAGEN is committed to ethical, environmental and social responsible management of our business activities and we integrate these principles into our company culture. We expect the same conduct from all our suppliers.

We are dedicated to advancing the sustainability of our operations and products. Guided by the 1.5°C business ambition, we aim to take meaningful climate action and encourage our suppliers to collaborate with us in achieving these goals through a shared, integrated approach.

QIAGEN is committed to reach net-zero greenhouse gas emissions (GHG) across the value chain by 2050 from a 2020 base year and has near- and long-term goals validated by the Science Based Targets initiative (SBTi). The SBTi defines and promotes best practice in science-based target setting, offers resources and guidance to reduce barriers to adoption, and independently assesses and approves companies' targets.

Suppliers are encouraged to share details of their plans for reducing greenhouse gas (GHG) emissions. When requested, they should also provide a signed confirmation indicating whether their reduction plans are based on recognized science-based approaches..

QIAGENs procurement organization support to further develop and push ahead QIAGENs aims for sustainability, independence, fairness, and sincere business practice as part of our corporate team goals and will communicate each breach with immediate effect.

This Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations' Universal Declaration of Human Rights, guiding principles about children's rights and child labor, the United Nations Guiding Principles on

Business and Human Rights, the International Labor Organization's international labor standards, and the Global Compact of the United Nations.

Any procurement and supply activity including but not limited to delivery of products and services to any QIAGEN subsidiary around the world must be conducted in alignment with this code of conduct as well as with all applicable and local laws and regulations of countries where QIAGEN does business with.

2. Purpose and Scope

The purpose of the Supplier Code of Conduct is to ensure that QIAGEN suppliers, contractors, consultants, and business partners confirm with the acceptance of our orders, that they understand these guidelines and comply with them. We will not knowingly do business with suppliers who violate these expectations.

3. Definitions

3.1 Sustainable Procurement

Sustainable procurement means to us to minimize our social and environmental impact throughout our supply base. We are aware of this responsibility and aim to balance sustainability criteria within the acquisition of goods and/ or services with best possible total cost of ownership.

3.2 Sustainable Sourcing Criteria

Sustainable sourcing integrates social, ethical, and environmental factors into supplier selection. Suppliers are strongly encouraged to follow green purchasing, provide environmentally preferable products and services, and set emission reduction targets in line with SBTi and QIAGEN's net-zero goal. They should design products and packaging for durability, repairability, and recyclability, and, where feasible, participate in take-back or recycling programs. Suppliers are highly recommended to support circularity, comply with ESRS/CSRD reporting, and report material Scope 3 greenhouse gas emissions relevant to their products and services..

4. Ethics

4.1 Global Standard Preventing Bribery, Corruption and Conflicts of Interest

Suppliers do not offer, pay or accept bribes or permit sub-contractors or others to do so on their behalf, as stated in the United Nations Convention against Corruption.

This includes:

- Offering or giving – directly or indirectly – money or anything else of value to any person in order to obtain or retain business or secure any other improper advantage for themselves, their organization or QIAGEN.
- Offering payments, gifts, hospitality, entertainment, or anything of value if it could constitute a bribe.
- Suppliers do not allow personal or family interests to influence their independence or professional judgment.
- Suppliers have financial controls in place to prevent conflicts of interest affecting procurement and financial decision making.

4.2 Research and Development Ethics

Suppliers involved in the use or supply of human embryonic stem cells, genetic information, human and animal biological sample or genetically modified microorganisms comply with the below:

Animal Research and Welfare:

Suppliers comply with animal research and welfare requirements as stated in CloMS (Council for International Organizations of Medical Sciences) -

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International Guiding Principles for Biomedical Research Involving Animals. When animal testing is necessary, suppliers shall minimize the number of animals used for testing. Suppliers shall be equally committed to conducting animal testing using the most humane scientifically valid protocol, which must meet study and regulatory requirements, and shall conduct tests only in accordance with all applicable laws, or AAALAC (Association for the Assessment and Accreditation of Laboratory Animal Care) accreditation.

Clinical Trials:

Suppliers undertaking Clinical Trials ensure that trials are conducted in a manner compliant with the local ethics committee requirements. Suppliers ensure that they comply with the IFPMA (International Federation of Pharmaceutical Manufacturers & Associations) Code of Pharmaceutical Marketing Practices, the Declaration of Helsinki, local laws, regulations, and applicable codes of marketing practice in connection with interactions with Healthcare Professionals (HCP's).

Gene sequencing:

Suppliers of gene synthesis equipment or gene synthesis products are expected to follow the criteria of [International Gene Synthesis Consortium Criteria for Harmonized Screening Protocol](#).

4.3 Fair Trade and Competition

- Suppliers comply with trade regulations and restrictions of recognized national and international authorities, focusing on import restrictions and United Nations embargoes.
- Suppliers only seek competitive advantage through lawful means and will conduct their business consistent with fair and vigorous competition.
- Suppliers only engage in dialogue with competitors when there is a legitimate business reason to do so, and the dialogue is such that it will not restrict competition (e.g. is limited to public or non-commercial information).
- If a supplier has a dominant or monopoly position, it will not abuse that position to exclude competitors or exploit customers.
- Suppliers shall ensure screening of purchase contracts and purchase orders against the most recent and applicable sanctioned party lists.
- Suppliers ensure that their suppliers acknowledge and follow the principles set forth in this document.

4.4 Data and Service Protection

Suppliers shall comply with all applicable data protection and information security laws and regulations, including but not limited to the General Data Protection Regulation ((EU) 2016/679) (GDPR), the NIS2 Directive (EU) 2022/2555, and any relevant

national or sector-specific legislation which are applicable.

They must ensure transparency in the collection, use, and retention of personal data, limiting processing to what is strictly necessary for legitimate business purposes. Personal and confidential information shall only be shared with third parties when a legitimate need exists and adequate safeguards are in place to protect the data both in transit and at rest.

Suppliers are expected to assess and validate the data protection and security controls of any third parties they engage with, ensuring that these entities uphold equivalent standards of confidentiality, integrity, and availability. In the event of a data breach or security incident, suppliers must notify QIAGEN without undue delay and implement immediate mitigation measures to prevent further harm.

In addition to protecting data, suppliers must implement appropriate technical and organizational measures to safeguard the services they provide.

These measures should reflect the current state of technology and be tailored to the specific risks and regulatory requirements of the supplier's industry. This includes ensuring service resilience, secure system configurations, access restrictions, encryption, and regular vulnerability management. Suppliers must ensure that their services remain operational, secure, and reliable, even under adverse conditions or targeted cyber threats

5. Environmental Health and Safety, Energy Management

Suppliers shall have safety programs and environment management systems in place for managing and maintaining all their business activities and processes in accordance with applicable safety and environmental standards. Programs shall be appropriate to the facility and the process risk, ensuring people are protected from unhealthy exposure to physical, psychological, chemical, and biological hazards. It shall also cover future development and improvements to products or services provided to QIAGEN. The supplier shall be committed to minimizing negative impact on the environment and continuously improve, monitor, and document environmental aspects within their operations.

Suppliers shall identify, assess, and manage significant risks to safety, health, and environment, throughout its facilities, products and supply chain, including emergency situations in the workplace, public neighborhood and company-provided living quarters. Their potential impact shall be minimized by implementing appropriate fire protection, effective emergency plans, regular drills, and response procedures.

Suppliers shall communicate, disclose, and manage hazards inherent in their processes and products to ensure that affected or potentially affected third parties

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are protected. Major incidents should be analyzed and communicated in accordance with the local law. For hazardous installations and processes, the supplier should regularly conduct specific risk assessments and implement measures that prevent the occurrence of incidents such as chemical releases, fires, or explosions.

Suppliers shall make safety information on identified workplace risks available to employees and corresponding contractors. They shall be continuously trained to ensure they are adequately protected at all times.

Suppliers shall apply all labelling and safety icons required in order to ensure that goods are handled properly.

Suppliers shall ensure that wastewater effluents are safe to receive surface and ground waters. Soil, water, or air pollution are prevented, and excessive water consumption is excluded. Furthermore, suppliers shall especially prevent and minimize the release of hazardous substances or active ingredients via spills or via fugitive emissions to the environment.

Suppliers will reduce the consumption of natural resources and minimize waste by

- Improving energy and water efficiency.
- Proposing products and services with reusable, recycled, or biodegradable materials.
- Improving recyclability of QIAGEN products through material selection and product design as approved by QIAGEN.
- Reducing use of substances of concern.
- Optimize transport modes of delivered goods to ensure that they meet environmental goals, in addition to required delivery times, and storage conditions.

Suppliers shall have climate protection as a core element of their business strategy. Suppliers shall assess the impact and risks climate change has on their business and supply chains and adapt both to climate change.

Suppliers shall strive to assess and minimize their impacts on biodiversity and natural ecosystems, and are encouraged to support nature-positive actions in their operations and supply chains.

Suppliers operating in water-stressed regions shall conduct water risk assessments and implement water stewardship practices to reduce consumption and prevent pollution.

Supplier shall not manufacture or use mercury, mercury waste or other hazardous or chemicals that are banned by applicable laws, regulations, or conventions.

Suppliers shall not engage in the export or import of hazardous waste. Suppliers are encouraged to voluntarily report sustainability and corporate citizenship related progress utilizing for example the United Nations Sustainable Development Goals, Dow

Jones Sustainability Index, (CDP) (formerly Carbon Disclosure Project), ISS ESG, international Frameworks such as Global Reporting Initiative (GRI), Sustainability Accounting Standard Board (SASB), Task Force on Climate Related Disclosures (TCFD), other equivalents and regular company Corporate Sustainability Reports.

Suppliers shall comply with all local and national laws concerning environmental, health and safety laws and regulations; material features and labelling; and transport of dangerous goods as appropriate.

Suppliers will provide QIAGEN with information on current safety data sheet (SDS) where applicable or other documents describing the nature of delivered goods and rules of proper handling and utilization, before or with first delivery of materials. Also, other types of chemicals, product and packaging materials, including data to calculate carbon footprint of activities impacting QIAGEN's carbon footprint and all necessary data related to their sustainability performance.

Suppliers shall periodically submit material declarations according to material relevant regulations such as RoHS, REACH data that certifies the compliance of components and products delivered to QIAGEN in a timely manner. This could include analysis data to support certification claim. Ideally, suppliers should provide full material disclosures to facilitate QIAGENs compliance.

This includes communication and data provision via 3rd party service providers for material/substance compliance management.

As part of our commitment to energy management and sustainability, we follow the principles of **ISO 50001**. In our own interest, we ask that when offering and designing products and systems, you pay attention to selecting the most energy-efficient technology possible. If better or optimized systems/technologies are available in terms of energy efficiency for the requested systems/technologies, we ask that you send us information about this energy-efficient technology, including an offer.

6. Labor & Human Rights

Respect for human rights is a fundamental value of QIAGEN. We strive to respect and promote human rights in our relationships with our employees, suppliers and stakeholders and expect them to follow the same standards as reflected in our Human Rights policy. *We are committed to providing an environment where all individuals have the equal opportunity to grow and contribute to our progress; regardless of age, educational background, sex (including gender identity, gender expression, sexual orientation), nationality, citizenship status, military/veteran status, physical or mental disabilities, neurotype, race/ancestry, ethnicity, religion, or any other status protected by applicable law.*

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6.1 Labor

All QIAGEN contracted Suppliers will not use child labor. The minimum age for employment is 15 years of age. If local law stipulates a higher minimum age for work or mandatory schooling, the higher age applies. Young workers under 18 shall not be employed at night or in hazardous conditions, or any kind of forced labor.

Freely Chosen Employment: Suppliers do not use forced, bonded, or indentured labor or involuntary prison or slave labor.

6.2 Wages, Benefits and Working Hours

- Suppliers pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.
- Suppliers communicate with the employee the basis on which they are being compensated in a timely manner.
- Suppliers are expected to communicate with the employee whether overtime is required and the wages to be paid for such overtime.
- Working hours comply with national laws and benchmark industry standards whichever affords greater protection.

6.3 Freedom of Association

- Open communication and direct engagement with employees to resolve workplace and compensation issues is encouraged.
- Suppliers respect the rights of employees, as defined in local laws, to associate freely, join or not join labor unions, seek representation, and join employees' councils.
- Employees are able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.
- Suppliers ensure that private or public security staff used is trained to respect the principles set forth herein.
- There is no restriction in recruitment, development and promotion based on race, gender, color, age, religion, nationality, sexual orientation, gender identity or expression, ethnic belonging, physical or mental disability, political affiliation, union membership or marital status or any other status protected by applicable law.

6.4 Non-discrimination and Fair Treatment

- Suppliers provide a workplace in which any form of harassment or discrimination is unacceptable.
- There is no restriction in recruitment, development and promotion based on

race, gender, color, age, religion, nationality, sexual orientation, gender identity, ethnic belonging, physical or mental disability, political affiliation, union membership or marital status or any other status protected by applicable law.

6.5 Vulnerable Groups

Suppliers shall respect the rights of local communities, including indigenous people and other vulnerable and disadvantaged groups. Suppliers shall obtain indigenous people's free, prior, and informed consent on whether and how to carry out business activities. Unlawful eviction and deprivation of land is not accepted. Suppliers shall listen to the concerns of the local residents and strive to create positive impacts through local engagement. The support of local job creation, local sourcing, education provisioning and infrastructure development is encouraged.

6.6 Conflict Minerals

QIAGEN seeks to avoid sourcing minerals or products and components made of minerals that contribute to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas, including the Democratic Republic of the Congo ("DRC") and DRC-adjointing countries.

For the conflict minerals tin, tungsten, tantalum, and gold, QIAGEN established processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and QIAGEN expects its suppliers to do the same. Smelting and refining without appropriate and audited processes of due diligence is to be avoided.

QIAGEN deplores the violence and inhumane treatment in the DRC, adjoining countries and other parts of the world. By adopting this Code of Conduct and collaborating with suppliers, QIAGEN is working towards promoting responsible business practices and foster peace and prosperity, which is consistent with QIAGENs values.

Suppliers will annually report to QIAGEN supply chain information regarding mineral country of origin and the smelters and refiners being utilized for products supplied to QIAGEN using the Conflict Minerals Reporting Template (CMRT) in the most current version. The reporting includes any stage of product live from development until phase out.

6.7 Security Forces

Whenever third parties (private or public) are employed to protect the supplier's operations and activities, suppliers must ensure that employees are protected through appropriate instruction or control of such third parties.

Security personnel must respect the human rights of the individuals they encounter while on duty. Use of torture, cruel, excessive force, inhuman, or degrading treatment or injury to life or limb, as well as impairment of the right to organize and the freedom of association are not accepted.

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7. Risk Management

Suppliers must identify and assess risks and impacts across their entire value chains—upstream and downstream. This includes conducting due diligence on direct and indirect suppliers, disclosing significant risks, mitigation actions, and outcomes, and reporting this information to QIAGEN upon request.

Risks may relate to sustainability, ethics, compliance, human rights, labor practices, environmental impact, or other areas covered by this Code of Conduct. Suppliers are expected to take appropriate measures to manage these risks and are encouraged to obtain third-party assurance for their disclosures.

In cases of suspected violations or elevated risk exposure, suppliers must promptly inform QIAGEN and provide regular updates on identified issues and corrective actions.

QIAGEN monitors compliance through self-assessment questionnaires and on-site audits. Suppliers agree to these audits but may object to specific measures if they conflict with mandatory data protection regulations.

8. Quality Management

Suppliers shall implement and maintain a documented quality management system appropriate to the products and services delivered to QIAGEN, in alignment with applicable standards such as ISO 9001 or ISO 13485. This includes effective risk management, traceability of supplied products, control of non-conforming product, and timely handling of complaints. Suppliers are expected to ensure regulatory compliance, maintain relevant records, and provide evidence of certification or

compliance upon request. Personnel involved in the supply of products and services must be appropriately trained and competent for their assigned roles.

9. Compliance Reporting and Complaint Mechanism

At the operational level, the supplier is responsible for establishing an effective complaint mechanism for individuals and communities who could be affected by negative impacts. This mechanism must be accessible to the supplier's workers and affected stakeholders, enabling them to raise concerns related to sustainability, human rights, and environmental impacts.

QIAGEN is committed to the highest possible standards of ethical, moral, and legal business conduct. To help facilitate the reporting of good faith concerns regarding, among other things, Legal and Ethical Issues, Accounting and Finance, Discriminatory Employment Practices, Harassment and/or Misconduct, Substance Abuse concerns, Breach of Confidentiality, Environmental Health & Safety Issues, Anti-Bribery and Regulatory violations, QIAGEN has established an anonymous compliance website that QIAGEN employees and others may use. Suppliers are expected to report violations or possible violations through the QIAGEN Compliance webpage <https://qiagen.integrityline.com/frontpage>.

By signing this document, the supplier commits to act responsibly and adhere to the principles and requirements specified herein. The supplier commits to communicate the content of this Code in a comprehensible manner to employees, contractors, and subcontractors and to make all necessary arrangements to meet the requirements. Any violation of the Supplier Code of Conduct QIAGEN becomes aware of may result in the termination of the business relationship.

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We hereby confirm that we have read and understood the above Supplier Code of Conduct and agree to act accordingly:

Company Name	Signatory Name

Signature	Signatory Position

10. Appendix 1

[QIAGEN Statement about the Modern Slavery Act 2015](#)



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QIAGEN Ltd and QIAGEN Manchester Ltd. (collectively "QIAGEN") is committed to ensuring that it understands the issues addressed by the Modern Slavery Act 2015 ("MSA 2015") and takes appropriate measures to stay compliant with the MSA 2015, ensuring that no modern slavery exists within QIAGEN or its supply chains.

QIAGEN's ultimate parent company (QIAGEN N.V.) is headquartered in the Netherlands with offices across the globe, including the UK. QIAGEN is always working to ensure QIAGEN conducts business well within the realms of the MSA 2015. In addition to this, QIAGEN feels it is every employee's personal responsibility to help QIAGEN remain compliant with the MSA 2015, and it reflects this in its Sustainability Position and Supplier Code of Conduct.

QIAGEN is always endeavoring to ensure that its employees and suppliers, both current and prospective are able to understand the importance of complying with the MSA 2015 and therefore allow QIAGEN to comply at all times.

QIAGEN's own supplier contracts contain modern slavery language, attempting to build this way of working into the very contractual relationship between the parties to keep modern slavery away from QIAGEN's doors and its supply chain. In addition to the foregoing, QIAGEN has been committed to carrying out business in line with the UN Compact, committed to the highest upholding of human rights, labor rights, environmental protection, and anti-corruption action.

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11. Appendix 2

Acronyms	Full Name	Description
CO2	Carbon Dioxide	
SBTi	Science Based Targets Initiative	Organization that sets the standard for emission reduction targets. Companies submit their targets, and SBTi validates them
CDP	Carbon Disclosure Project	Organization that develops a disclosure form related to a company's carbon emissions and climate strategy
ISS ESG	Institutional Shareholder Services Environment, Social and Governance	Rating agency that scores companies for their performance.
GRI	Global Reporting Initiative	Organization that sets standards for reporting non-financial information
SASB	Sustainability Accounting Standards Board	Organization that sets standards for reporting non-financial information
TCFD	Task Force on Climate-Related Financial Disclosures	Organization that sets standards for reporting non-financial information
CSR	Corporate Social Responsibility	Often used interchangeably with ESG and Sustainability
RoHS	Restriction of Hazardous Substances	EU directive
REACH	Registration, Evaluation, Authorization and Restriction of Chemicals	EU regulation

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12. Document Revision History

Revision No.	Description of Change
01	New document
02	Revised document