

ANTI-RETALIATION POLICY	
Global Process Owner:	Corporate Compliance

1.0 PURPOSE

- 1.1 Bio-Rad Laboratories, Inc., including its subsidiaries and affiliates (collectively “Bio-Rad” or “the Company”) is committed to ensuring that all individuals who report a concern in good faith are protected and all investigations of retaliation are conducted in a fair, impartial, thorough, thoughtful manner and in compliance with all applicable laws within the United States and applicable jurisdictions.
- 1.2 This policy sets forth the general guidelines by which Bio-Rad addresses retaliation.

2.0 SCOPE

- 1.1 This Policy applies to Bio-Rad Workforce Members.
- 1.2 This Policy sets forth Bio-Rad’s minimum compliance standards and is supplemented by additional global, regional, and country specific policies, and other Bio-Rad guidelines. If local laws, codes of conduct, or other regulations or the above mentioned Bio-Rad guidance are more restrictive than this Policy, the more restrictive guidance should be followed.

3.0 DEFINITIONS/ ABBREVIATIONS

The following terms are used in a specific way in this policy:

Term	Definition
Integrity Helpline	A tool for asking questions and reporting concerns about actual or potential violations of Bio-Rad’s Business Code of Ethics and Conduct, policies, and applicable laws.
Workforce Member	Workforce members include Bio-Rad Board of Directors, officers, employees, temporary workers and leased workers.

4.0 RESPONSIBILITY

Owner	Responsibilities
Corporate Compliance	<ul style="list-style-type: none"> • Ensure compliance with this Policy with the active support and participation of all business units. • Revise and publish changes to Policy.

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<p>Workforce Member</p>	<ul style="list-style-type: none"> All Bio-Rad Workforce Members are responsible for understanding the requirements of and adhering to this Policy Report violations of this Policy to Bio-Rad Integrity Helpline @ www.Bio-RadIntegrityHelpline.com
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5.0 REQUIREMENTS

5.1 Duty to Report.

- 5.1.1 Bio-Rad requires all Workforce Members to report any misconduct that a reasonable person believes might be a violation of Bio-Rad’s Code of Business Ethics and Conduct, Bio-Rad’s policies, or applicable law (a “Good Faith Allegation”). A Good Faith Allegation does not mean that the reporter is certain that a violation has occurred. Rather, it means that the reporter has reasonable suspicion that a violation may have occurred, based upon the reporter’s knowledge. A reasonable suspicion may also be based upon second-hand knowledge (for example, when an employee does not directly witness misconduct but is told about it by another individual).
- 5.1.2 It is important to understand that the duty to report exists even if the Workforce Member is in no way involved in the events surrounding the potential misconduct. For example, if an employee is told by a coworker about misconduct that the coworker witnessed, then both the employee and the coworker have an individual duty to report the misconduct. Bio-Rad maintains this high standard for all Workforce Members because the company places a very high priority on detecting and preventing misconduct in all of our business dealings.
- 5.1.3 Any Workforce Member who submits a good faith allegation or honestly participates in an internal investigation shall be protected by Bio-Rad against retaliation, as provided in Section 5.2.
- 5.1.4 **Prohibition Against Bad Faith Reporting.** A “bad faith” report is a report of potential misconduct submitted by a reporter when the reporter knows the allegation she or he is making is false and without merit. Any reporter who submits a misconduct allegation solely for the purpose of unfairly harming, harassing, or stigmatizing another party shall be considered to have submitted a bad faith allegation. Submission of a bad faith allegation is a serious violation of Bio-Rad’s Code of Business Ethics and Conduct. Any Workforce Member who submits a bad faith accusation will not be protected by this policy and may be subject to disciplinary action up to and including termination.

5.2 Forms of Prohibited Retaliation. Prohibited retaliation may take many forms, including the following:

- 5.2.1 Adverse employment actions such as, termination, decreased compensation, poor work assignments;
- 5.2.2 Harassment or discrimination;
- 5.2.3 Threat of physical harm; or
- 5.2.4 Denying or terminating a contract with a Bio-Rad business partner.

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5.3 Parties Protected Against Retaliation. Bio-Rad strictly prohibits any Workforce Member from retaliating against any of the following:

- 5.3.1 Any Workforce Member, Bio-Rad business partner, or member of the public who has submitted a good faith allegation of misconduct to (i) the Integrity Helpline; (ii) Corporate Compliance; (iii) Human Resources; or (iv) Bio-Rad management.
- 5.3.2 Any Workforce Member, Bio-Rad business partner, or member of the public who has participated in any internal investigation as a witness or producer of records or evidence.

5.4 Limitations on Anti-Retaliation Protections.

- 5.4.1 Any reporter who submits a bad faith report shall not be protected by this policy for that bad faith report.
- 5.4.2 Protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated or on-going performance issues.

5.5 Reporting Retaliation. If any Workforce Member believes that she or he has experienced retaliation or witnessed retaliation against another Workforce Member, she or he is strongly encouraged to report this information to Corporate Compliance via the Integrity Helpline, available at www.Bio-RadIntegrityHelpline.com, or to Human Resources.

5.6 Investigation of Potential Retaliation. Bio-Rad shall thoroughly investigate any good faith allegation of retaliation. These investigations will usually be done by Corporate Compliance or Human Resources. Bio-Rad shall ensure that any substantiated findings of retaliation result in prompt corrective action, which shall generally include (i) undoing or mitigating any harm suffered by the victim of the retaliation and (ii) disciplinary action against the party committing the retaliation, up to and including termination of employment.

6.0 REFERENCES

- 6.1 Bio-Rad’s Global Anti-Corruption and Healthcare Compliance Policy
- 6.2 Corporate Compliance Investigation Policy
- 6.3 Code of Business Ethics and Conduct

7.0 REVISION HISTORY

Rev #	Description of Changes	
1	<ul style="list-style-type: none"> • Initial Release of Policy 	June 6, 2022

8.0 APPENDICES
