Bio-Rad Supplier Code of Conduct

October 2020
Overview

Our mission: To provide useful, high quality products and services that advance scientific discovery and improve healthcare.

Bio-Rad Laboratories, Inc., together with its subsidiaries, is committed to conducting its business in a legal, ethical and professional manner and to treating customers, suppliers, employees, government agencies and the public with respect, honesty and integrity. Bio-Rad strives to conduct business only with suppliers who share our commitment to compliance with legal requirements and the highest ethical standards. Bio-Rad expects all of its suppliers to conduct business responsibly, with integrity, honesty, and transparency.

Purpose and Scope

This Supplier Code of Conduct outlines Bio-Rad’s fundamental expectations for its suppliers’ business conduct with respect to labor and human rights, health and safety, environmental protection and supply chain, and compliance with laws (including those prohibiting corruption and bribery) and ethics. This Code applies to all Bio-Rad suppliers, and their subsidiaries, suppliers, subcontractors and manufacturers’ representatives. Suppliers are responsible for sharing this Code with all individuals who perform work for or on behalf of Bio-Rad.

Compliance

All suppliers are expected to understand and comply with this Code. Any violations may jeopardize the supplier’s business relationship with Bio-Rad, up to and including termination.
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Labor and Human Rights

All workers in Bio-Rad’s supply chain deserve a fair and ethical workplace. Suppliers must treat their workers with dignity and respect, in accordance with the highest standards of human rights.

Voluntary Labor

All labor must be voluntary. Suppliers shall not engage in or support trafficking in human beings. Slave, child, underage, forced, bonded, or indentured labor will not be tolerated. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person. Workers must be allowed to maintain control over their government-issued identification, travel and work permit documents. Upon Bio-Rad’s request, suppliers shall certify that they have implemented procedures to ensure compliance with laws on slavery and human trafficking. Suppliers shall ensure that any third-party recruitment agencies it uses comply with this Code and the law.

Anti-discrimination

All terms and conditions of employment including, but not limited to, hiring, pay, training, promotion, termination, and retirement must be based on an individual’s ability and willingness to do the job. Suppliers must not discriminate against any worker based on age, disability, race, national origin, ethnicity, gender, marital status, sexual orientation, political affiliation, religion or union membership.

Anti-harassment and Abuse

Workplaces must be free of harassment and abuse. Supplier shall not threaten workers with, or subject them to, harsh or inhumane treatment, including verbal abuse, corporal punishment, mental and physical coercion and sexual harassment.

Working Hours

Suppliers shall follow all applicable laws and regulations with respect to working hours, overtime and days of rest.

Hiring

Suppliers must implement hiring practices that accurately verify workers’ minimum age for employment and legal right to work in the country prior to employment.

Wages and Benefits

Suppliers must comply with all applicable wage laws and regulations, including those relating to minimum wage, overtime hours, and legally mandated benefits.

Freedom of Association and Collective Bargaining

Suppliers must respect the right of workers to choose whether to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively. Workers shall be able to openly communicate grievances to management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.
Health and Safety

A safe and healthy work environment minimizes the incidence of work-related injuries and illnesses, enhances the quality of products and services, and increases worker retention and morale.

Occupational Health and Safety

Suppliers must take proactive measures to prevent workplace hazards. Exposure to potential safety hazards must be controlled through proper controls, preventative maintenance, safe work procedures and appropriate health and safety training. Workers shall be provided with appropriate protective equipment to guard against workplace hazards. Process safety programs and emergency response plans shall be implemented and maintained to prevent and mitigate catastrophic events. Suppliers shall also implement processes to investigate incidents of work-related injuries and illnesses.

Working and Living Conditions

Suppliers who provide residential and dining facilities for their workers must provide safe, healthy and sanitary facilities.
Environmental and Supply Chain

Bio-Rad is committed to implementing and maintaining environmentally responsible business practices throughout its supply chain. Suppliers shall ensure that their facilities comply with environmental laws, including all applicable laws related to waste disposal, air emissions, discharges, toxic substances and hazardous waste disposal. Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to mitigate their safe handling, movement, storage, use, recycling, reuse and disposal. All required environmental permits shall be obtained and kept current. Further, suppliers shall diligently manage their supply chains to support responsible sourcing. Suppliers shall provide all disclosures, certifications and information in a timely and accurate manner as required by applicable laws and regulations.

Regulated Substances

Suppliers shall comply with Bio-Rad’s specifications for regulated substances applicable to goods provided to Bio-Rad. Suppliers also shall have adequate systems in place designed to identify and disclose to Bio-Rad all chemicals in their products and product sub-components that are regulated by the governments and/or competent authorities in the regions where they are being used. These regulations include, but are not limited to:

- Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) – chemicals, substances and intermediates above certain volumes and/or containing substances of very high concern (SVHC) must be registered if manufactured in the EU and/or placed in the EU market.

- Restriction of Hazardous Substances (RoHS) – hazardous substances contained in electrical products.

Conflict Minerals

Suppliers shall determine whether the products they sell to Bio-Rad contain any tantalum, tin, tungsten and gold, and if so, whether these minerals directly or indirectly financed or benefited armed groups that are perpetrators of human rights abuses in the Democratic Republic of Congo or any adjoining country. Suppliers shall perform due diligence on the source and chain of custody of these minerals and make their due diligence available to Bio-Rad at Bio-Rad’s request. Suppliers shall also assist Bio-Rad with its own due diligence efforts regarding these minerals at Bio-Rad request. For more information, please review our Conflict Minerals Policy (available at www.bio-rad.com).
Compliance with Laws

Suppliers and their facilities must fully comply with all applicable national and local laws and regulations of the countries in which they operate, including, but not limited to, those laws and regulations related to labor, immigration, health and safety, the environment, the transfer of goods, services, software and technology across national borders (including economic sanctions, export controls and Anti-boycott regulations), data privacy, healthcare, and corruption and bribery.

Suppliers must not be ineligible to participate in the U.S. federal healthcare programs or U.S. federal procurement or non-procurement programs. Suppliers must also not be on the U.S. General Services Administration’s List of Parties Excluded from Federal Programs (www.sam.gov), the U.S. Department of Health and Human Services’ List of Excluded Individuals/Entities (www.hhs.gov), the U.S. Department of the Treasury’s Specially Designated Nationals and Blocked Persons List (www.treasury.gov), the U.S. Commerce Department’s Denied Parties List and related lists of parties of concern (www.bis.doc.gov), or any other list of excluded, denied or prohibited countries, entities, or persons maintained by any government body with jurisdiction over Bio-Rad or the products or services provided to Bio-Rad by suppliers.

Anti-Corruption

Corruption, bribery, extortion and embezzlement, in any form, are strictly prohibited. Suppliers must not pay or accept bribes or participate in other illegal inducements in business or government relationships. No intermediaries, including but not limited to agents, subcontractors, consultants, suppliers, manufacturers’ representatives, distributors or any other business partners, shall be used to commit acts of bribery. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including but not limited to the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and applicable international anti-corruption conventions. Any relationship between suppliers and public officials shall be in strict compliance with the rules and regulations to which they are subject (i.e., any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer). Bio-Rad does not permit facilitation or “grease” payments on its behalf, even if local laws permit them.

Gifts and Entertainment

Suppliers must not offer, pay for, or give gifts or entertainment (including, but not limited to, cash, gift cards, tickets to sporting events or concerts, payments for travel expenses, etc.) to Bio-Rad employees or those working on behalf of Bio-Rad.

Conflicts of Interest

Suppliers must avoid transactions with Bio-Rad personnel that create a conflict of interest. A conflict of interest occurs whenever the prospect of personal gain may influence business judgment. Any situation that even has the appearance of a conflict of interest should be disclosed to Bio-Rad. For example, a conflict of interest might arise if the spouse of a supplier employee works for Bio-Rad. Transparency is best in these situations. Please disclose any potential conflicts of interest to Bio-Rad’s Integrity Helpline.
Confidentiality

Suppliers shall safeguard Bio-Rad’s confidential and proprietary information and shall not use or disclose such information other than with the express consent of, and for the benefit of, Bio-Rad. In particular, Suppliers shall not exchange or otherwise disclose Bio-Rad’s confidential information with any competitor of Bio-Rad.

Fair Competition

Suppliers shall conduct business competitively and in full compliance with all applicable antitrust and competition laws and regulations. Suppliers shall not fix prices or rig bids with their competitors. Suppliers shall not allocate customers or markets with their competitors, or exchange current, recent, or future pricing information with their competitors.

Animal Welfare

Applicable suppliers shall strive to ensure that animals are treated respectfully, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the number of animals used or refine procedures to minimize distress. Alternatives should be used wherever scientifically valid and acceptable to regulators.

Governance

Management Systems

Bio-Rad holds its suppliers accountable to this Code and all of its standards. Suppliers shall implement and maintain a management system that facilitates compliance with the principles set forth in this Code, identifies and mitigates related operational risks and enables continual improvement. Suppliers shall perform periodic evaluations of its facilities and operations (and the facilities and operations of its subcontractors and sub-tier suppliers) to ensure compliance with this Code and legal requirements. Suppliers should communicate a process for their personnel to be able to raise concerns without any fear of retaliation. Suppliers shall timely correct any deficiencies or violations identified by Bio-Rad or its internal or external auditors.

Sub-suppliers and Subcontractors

Suppliers shall have a program to support compliance by their own suppliers and subcontractors (including without limitation any intermediaries, agents, manufacturers’ representatives, distributors or any other business partners) with the standards set forth in this Code.

Integrity of Books and Records

All business dealings should be performed transparently and accurately reflected on appropriate books and records. Suppliers must keep accurate records of all matters related to their business with Bio-Rad and shall maintain documentation necessary to demonstrate compliance with this Code and applicable laws and regulations. Supplier must never falsify records or make misrepresentations about its business practices.
Reporting Violations and Concerns

Bio-Rad encourages its suppliers to seek guidance regarding Bio-Rad’s policies when needed and to raise concerns regarding activities that may involve illegal activity, violations of policy or unethical conduct, including violations of Bio-Rad’s Code of Business Ethics and Conduct and this Supplier Code of Conduct.

Bio-Rad has retained an independent third party to operate the “Bio-Rad Integrity Helpline” through which concerns and violations may be reported confidentially and anonymously to the extent permitted by law. Suppliers may access this helpline as set forth below. The Bio-Rad Integrity Helpline is monitored twenty-four hours a day, seven days a week.

Bio-Rad’s Integrity Helpline:

- Toll-free calls from within the United States and Canada: +1 800-461-9330; toll-free numbers for other countries are available at the Website below
- Website (global): www.Bio-RadIntegrityHelpline.com (available in multiple languages)

Reports made directly to Bio-Rad will be treated confidentially to the extent permitted by law.

For business-related matters that do not pertain to illegal activity, violations of policy or unethical conduct, please contact your Bio-Rad purchasing representative.

Resources

Bio-Rad’s Code of Business Ethics and Conduct, along with other applicable Bio-Rad policies, may be found at the Investor Relations section of Bio-Rad’s website at www.bio-rad.com under the heading “Corporate Governance.”

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