



Hologic's International Modern Slavery Statement (Oct 2023 – Sep 2024)

Hologic is committed to upholding and respecting human rights globally for all people by conducting business with the highest ethical standards and in compliance with applicable global laws, regulations, and Hologic policies.

Guided by purpose, our passion, and our promise, we strive to exemplify the positive societal benefits that private enterprise can drive. We embrace our responsibility to be a leading corporate citizen in the communities in which our employees work and live. Our values of honesty, integrity, respect, trust, citizenship, and responsibility are the foundation of our culture and guide our interactions with customers, business partners, our people, communities, and the planet.

This statement (the "Statement") of Hologic is prepared in accordance with:

- Section 54 of the United Kingdom Modern Slavery Act 2015
- Australian Modern Slavery Act 2018
- California Transparency in Supply Chains Act of 2010
- Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Canada Acts")

This statement reflects the fiscal year ending September 30, 2024. This statement is intended to provide information on a worldwide basis in accordance with those Modern Slavery Laws to apply specifically to the Hologic entity or entities named at the end of this Statement ("Hologic").

This Statement explains the steps that Hologic has taken to assess and help address modern slavery risks in our operations and supply chains. International Modern Slavery Acts and the California Transparency in Supply Chain Acts require certain businesses to provide public disclosures regarding efforts to eliminate slavery and human trafficking from its supply chain. Pursuant to the Canada Acts, this Statement describes the steps we have taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods or of goods imported into Canada during the reporting period.

Hologic's structure, operations and supply chains

Hologic helps women around the world live healthier lives. We develop life-changing medical technologies that deliver exceptional results essential to effectively detect, diagnose, and treat health conditions that affect women.

Hologic constitutes a global enterprise ultimately owned and controlled by Hologic, Inc. which is listed on NASDAQ and headquartered in Marlborough, Massachusetts, United States of America. Further details of the entities covered by this statement are set out at the end of this statement.

As of 30 September 2024, Hologic has approximately 7,000 global employees with around 4,000 in North America, 1,000 in South America, 1,400 in the EMEA region, and just under 500 in the APAC region.

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Hologic sources almost all of its products from medium to large corporations in organised and specialised sectors like microchips, electronic components moulding, heavy chemicals and metal industry. Most suppliers have manufacturing in United States or Europe. Products are imported into Canada by Hologic, Inc as well as Hologic Canada and sold within Canada by Hologic Canada and its distributors DynaTech.

The risks of Modern Slavery Practices in our operations and supply chains

We consider Hologic's operations to be low risk of causing or contributing to modern slavery practices. The lower risk is enabled by our commitment to strong governance, internal policies and procedures, the professional nature of our extended workforce, and the location of our key sites. Hologic mostly manufactures its products inhouse with manufacturing sites in the US, Costa Rica, UK, and the EU or contract manufacturers in North America, EU, and Malaysia with reputed global multinationals.

Our Global Supply Chain team supports key locations around the world with our main manufacturing facilities and distribution centers located in countries where the prevalence of modern slavery is categorized as low/low-medium risk by Global Slavery Index¹.

For Hologic or any medical devices company the biggest risk is in extended upstream supply chain and suppliers. We have identified the following areas of potential vulnerability when considering risks that we may cause, contribute to, or are directly linked to modern slavery practices:

- International freight forwarders engaging in slavery practices especially sea freight where sailors are unable to leave ship. The vulnerable population include migrant workers, base-skilled workers.
- Third party logistics engaging in slavery practices in their warehouses as their operation is labor intensive. The vulnerable population include migrant workers, base-skilled workers.
- Suppliers sourcing products from countries that are at higher risk of slavery practices. High risk geographies include countries in Asia, Eastern Europe and Latin America that are conflict affected or with weak rule of law.
- Cleaning and maintenance service providers engaging in slavery practices in their operation. The vulnerable population include migrant workers, base-skilled workers.

To address this risk at Hologic, we have included a mandatory clause in all contracts and purchase orders binding all suppliers be in full compliance with all applicable governmental, legal, regulatory, and professional requirements. Suppliers will also be required to comply with Hologic's standards relating to modern slavery, irrespective of the country where suppliers are based, or where their supply chain is operating.

¹ Global Slavery Index is generated through the work of Walk Free, an international human rights group working to accelerate the end of all forms of modern slavery. The Global Slavery Index is the world's most comprehensive data set on modern slavery < <https://www.walkfree.org/global-slavery-index/> >



The actions Hologic takes to assess and address these risks

1. Policies in Relation to Modern Slavery, Human Trafficking, Human Rights and Fair Working Conditions, Forced and Child Labour

Hologic is committed to compliance with all labor laws and regulations that apply to our global workforce. We are committed to operating with integrity and the highest ethical standards. We hold ourselves accountable for these commitments and we extend the same expectations across our value chain around the globe. We have several policies that reflect our values, and we consider it business-critical to work with suppliers who share those values.

The Hologic Code of Conduct (The "Code"). [The Code](#) outlines Hologic's commitment to integrity and ethical conduct. Compliance with the Code of Conduct is mandatory of everyone who acts on behalf of Hologic, including our directors, officers, employees and agents worldwide.

All employees are required to annually certify training to the Code of Conduct. Anyone who violates our Code or other corporate policies will be acting outside the scope of his or her employment and will be subject to Disciplinary Action. Disciplinary response will be determined by the Company and can include termination of employment and, where appropriate, civil liability and criminal prosecution. Hologic is committed to creating an environment where employees are comfortable raising their concerns about violations or potential violations of the Code and has created various mechanisms for employees to communicate these concerns. Reporting of violations, potential violations, conflicts of interest, and questions or feedback related to the Code can be raised to employee managers, Human Resources, the Legal Department, or to the General Counsel. Employees can also report these issues by calling the Hologic Compliance Hotline or by visiting the Hologic Compliance Website and will have the option of remaining anonymous to the extent allowed by local laws.

The Code covers Human rights and fair working conditions

Hologic supports fundamental human rights globally and is committed to a work environment that is free from human trafficking and slavery. We do not allow child or forced labour by our company, nor do we knowingly work with business partners that employ children or forced labour. We also follow all applicable wage and hours laws.

Hologic is also committed to respecting, protecting and championing the human rights of all who come into contact with our operations, including employees, supply chain workers, customers and local communities. We accept our responsibility to support transparency; to find and resolve problems; to regularly review our business practices; and to collaborate with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

Hologic has strong internal policies on equality and opportunity, whistle-blowing procedures, migrant labour policies, child labour policy, child protection policy, gender policy and supplier code of conduct. At Hologic we embrace our responsibility to be a leading corporate citizen in the communities in which our employees work and live.

The Code of Conduct will continue to be reviewed on a regular basis to ensure that we approach our responsibilities regarding human rights and fair working practices in an appropriate manner.

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The **Hologic Human Rights Policy** includes the following key guiding principles

- We are committed to treating every person with dignity, respect, and professionalism.
- We are committed to respecting, protecting and championing the human rights of all who engage with our operations, including employees, our supply chain, customers and local communities.
- We respect the right to clean air, clean water, and a sustainable environment.
- We aim to be a positive impact on the communities where we operate.
- As a signatory participant in the United Nations Global Compact, Hologic supports the fundamental principles found in the international standards such as the International Bill of Rights, the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.
- We are committed to applying this policy and expect our business partners to do the same.
- Specific topics include Equal opportunity, anti-discrimination, anti-harassment, and fair compensation; Prohibition of child labour, forced labour, prison labour, modern slavery, and other exploitative labour practices; Safety; Environmental stewardship; Disciplinary action, reporting concerns, and prohibition of retaliation.

Hologic Procurement Procurement and Supplier Guidebook ("Supplier Guidebook"). The Supplier Guidebook provides a Code of Conduct to communicate the requirements and expectations that Hologic has for suppliers.

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

The Supplier Guidebook further covers modern slavery, fair wages and hours, equal opportunity, anti-discrimination.



2. Procurement and Contractual Controls

Our Responsible Procurement programme covers materials items and services, including outsourced customer deliveries, logistics, technology, marketing, property, cleaning and catering. The vendors are grouped under four main categories

- Material
- Manufacturing
- Logistics & Supply Chain
- Property & Facilities Management
- Services

All purchase orders to vendors have a specific clause on Modern Slavery and bind the suppliers to commit and comply to applicable Modern Slavery Laws. Most of our suppliers are based in USA / UK and Europe. To enable us to monitor compliance, we have deployed a self-assessment and self-audit process for our suppliers. The suppliers/Vendors will self-certify as supporting corporate responsibility, procurement and ethical trade. We will reserve the right to audit our vendors operations and premises and their subcontractors against our standards and policies.

3. Managing supplier contracts

As a standard, Hologic already includes in its purchasing contracts language mandating that suppliers be in full compliance with all applicable governmental, legal, regulatory, and professional requirements for laws governing modern slavery. Suppliers will also be required to comply with Hologic's other codes of conduct.

4. Employee education

Hologic has provided and will continue to provide employees and management with specific training related to identifying and reporting human trafficking, slavery, forced and child labour for those employees and contractors linked directly to supply chain management.

Compliance training in relation to our Code of Conduct is required for all employees. Training and execution of our Code of Conduct is audited. Violations of Hologic's Code of Conduct are reportable through [Hologic EthicsPoint Website](#).

5. Complaints and grievance procedure

To address individual concerns, we have a complaints and grievance procedure. This allows community members and other interested stakeholders, such as our suppliers, to raise issues directly with our operations anonymously. We respond to all complaints and grievances and aim to resolve any issue as soon as possible.

6. Our Giving Criteria

Hologic's strategic intent is to strengthen education, healthcare and equality in the communities where our employees work and live.

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We support programmes and initiatives in the following areas:

- **STEM Education**
Programmes that improve science, technology, engineering and mathematics education, especially for under-privileged groups.
- **Healthcare**
Working with organisations in specific areas that align with Hologic's mission, such as access and equity for women's health.

Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

In the Reporting Period, Hologic took the following steps to prevent and reduce the risks that forced and child labour is used in our supply chains and that of subsidiaries:

- Reviewed and revised its supplier guidebook
- Supply chain mapping to assess suppliers of products that are at risk of being connected to forced and child labour based on location of operations.
- Conducted internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Addressed practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developed and implemented due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.
- Carried out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Required suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developed and implemented anti-forced labour and/or -child labour contractual clauses
- Developed and implemented anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Monitoring suppliers
- Developed and implemented training and awareness materials on forced labour and/or child labour

Measures Taken to Remediate any Forced Labour or Child Labour

- Hologic is an organization with strong values of responsibility and integrity. Hologic is committed to an environment where open, honest communication are the expectation, not the exception.
- As noted, above, to address individual concerns, we have a complaints and grievance procedure. This allows community members and other interested stakeholders, such as our suppliers, to anonymously raise issues concerning Hologic's operations, including

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as concerns forced and child labour, to a third-party. We respond to all complaints and grievances and aim to resolve any issue as soon as possible.

- Hologic and Hologic Canada are not aware of any incidents of forced or child labour in our supply chain and therefore the issue of remediation has not arisen. We will nevertheless continue to act in accordance our policies and processes aimed at prohibiting the use of forced and child labour in our business and supply chains and respond accordingly if such incidents arise.

Measures Taken to Remediate the Loss of Income

Hologic and Hologic Canada are not aware of any of any families that have experienced the loss of income as a result of steps that they have taken to eliminate forced or child labour risks in our supply chain, and therefore the issue of remediation of loss of income has not arisen.

How we assess the effectiveness of our actions to address the risks of Modern Slavery

The effectiveness of the measures Hologic takes to address the risks of modern slavery is assessed by way of Supplier Audits, and sample audits of their supply chains. At Hologic there is a regular review and update of policies and procedures in line with changing laws in countries and Hologic internal governance process is focused on continual improvement, training and coaching of internal and external stakeholders.

Process of consultation with controlled entities

In preparing this statement, Hologic has engaged and will engage with:

- their controlled entities (where applicable);
- their compliance teams; and
- their executive directors

to obtain an understanding of modern slavery risks in key supply chains and operations, and appropriate actions taken to address and mitigate identified risks.

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Hologic entities covered by this report

This report covers the following entities:

Hologic, Inc.

Hologic Canada ULC, a Canadian company incorporated under the laws of British Columbia, ultimately owned and controlled by Hologic, Inc.

Hologic HUB Ltd., a United Kingdom company ultimately owned and controlled by Hologic, Inc.

Hologic Ltd., a United Kingdom company ultimately owned and controlled by Hologic, Inc.

Hologic (Australia & New Zealand) Pty Ltd ABN 95 079 821 275, an Australian company, all of the shares of which are directly owned by Hologic HUB Ltd.

Statement of Approval

This Statement constitutes Hologic's Modern Slavery Statement for the fiscal year ending September 30, 2024.

The statement has been approved by the Board of Hologic HUB Ltd. and by the Board of Hologic Ltd.

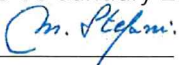
In Australia, the only reporting entity (as defined in the Modern Slavery Act 2018) named above is Hologic (Australia & New Zealand) Pty Ltd. Hologic (Australia & New Zealand) Pty Ltd owns or controls no other entities. The statement has been approved by the Board of Hologic (Australia & New Zealand) Pty Ltd.

For the purposes of the United Kingdom Modern Slavery Act 2015 and Australian Modern Slavery Act, in 2021 it was resolved by the Board of Hologic HUB Ltd and Hologic (Australia & New Zealand) Pty Ltd that a director of the company be authorized to approved changes and sign any future Modern Slavery Statements in relation to the forthcoming fiscal years.

For the purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, Canada*, this report is filed by Hologic, Inc on behalf of itself and Hologic Canada ULC. This report is approved and attested, as required under subsection 11(4)(b)(i) and subsection 11(5) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, Canada*.

Signed:

Date 09 January 2025



Michelangelo Stefani

Director, Hologic (Australia & New Zealand) Pty Ltd
Director Hologic HUB Ltd.
Director, Hologic Ltd.
Director, Hologic Canada ULC



Mark Irving

Vice President and Secretary
Hologic, Inc.