



Hologic's International Modern Slavery Statement (Oct 2022 – Sep 2023)

This statement explains the steps that Hologic has taken to eliminate slavery and human trafficking from its supply chain. Some countries have implemented legislation that requires certain businesses to provide public disclosure in this regard. This legislation includes, but is not limited to, Section 54 of the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 ("Modern Slavery Laws"). Modern slavery is a worldwide issue and 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").

Hologic's structure, operations and supply chains

Hologic is an innovative medical technology business primarily focused on improving women's health and well-being through early detection and treatment.

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.

The Hologic entities covered by this statement had 492 employees in UK and Australia as at 30 September 2023, with 89 employees working in Australia.

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.

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

Hologic's operations are at low risk of causing or contributing to modern slavery practices. Hologic aims to comply with all labor laws and regulations that apply to its global workforce. 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.

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.

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- 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.

The actions Hologic takes to assess and address these risks

1. Human Rights and Fair Working Conditions

Human rights and fair working conditions are laid out in our employee [Code of Conduct](#). Compliance with this is mandatory for all employees. The Code of Conduct will continue to be monitored and updated from time to time to ensure that we approach our responsibilities regarding human rights and fair working practices in an appropriate manner.

Slavery, servitude, forced labour, bonded labour and human trafficking are issues of increasing global concern, affecting all sectors, regions and economies. Modern slavery is unacceptable within our business and supply chain and combatting it is an important element of our approach to business and human rights. 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. Specifically, we seek to support local non-profit organisations that are focused on improving education, healthcare and equality.

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

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- 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 and slavery for those employees and contractors linked directly to supply chain management.

Compliance training in relation to our Code of Conduct is required for 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.

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.

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- **Healthcare**
Working with organisations in specific areas that align with Hologic's mission, such as women's health.
- **Equality**
Groups that promote social and racial justice especially in healthcare.

The programme covers:

- Main products/services/customers
- Company structure and subsidiaries, including outside the UK
- Entire supply chains

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.

Hologic entities covered by this report

This report covers the following entities:

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.

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.

The statement has been approved by the Board of Hologic HUB Ltd. on 16th September 2020 and by the Board of Hologic Ltd. on 16th September 2020.


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 on 17th October 2021.

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In 2021 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.

Signed:

Date 24th November 2023



Michelangelo Stefani, VP Legal International, Hologic

Director, Hologic (Australia & New Zealand) Pty Ltd

Director, Hologic HUB Ltd.

Director, Hologic Ltd.