



Statement on  
Modern Slavery  
2025

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# Eppendorf Group

## Statement on Modern Slavery 2025

This statement covers the fiscal year 2025 (from January 1st to December 31st, 2025) and is made in accordance with the United Kingdom Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018.

The statement is issued on behalf of Eppendorf SE and its affiliates, especially Starlab (UK) Limited, Eppendorf UK Ltd., Eppendorf Cryotech Ltd., and Eppendorf South Pacific Pty. Ltd. ("Eppendorf," "we").

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**Dear Readers,**

In today's world, modern slavery and human trafficking remain significant challenges to society. Such practices violate the fundamental principles of human rights and dignity, and are serious crimes that exploit individuals for forced labor, servitude, or other forms of abuse. We believe that every person deserves respect, fairness, and dignity. In line with our purpose "to improve human living conditions", we are committed to upholding these principles in every aspect of our business.

At the Eppendorf Group, we are dedicated to operating transparently and in compliance with all applicable laws and regulations. We have implemented robust policies and procedures to detect, prevent, and mitigate the risks associated with modern

slavery and human trafficking. These policies are designed to create a culture of awareness, accountability, and continuous improvement across our organization and supply chains.

This Statement on Modern Slavery declares our unwavering commitment to combating modern slavery and human trafficking. It outlines the steps to ensure our operations and supply chains are free from these unlawful practices. Through comprehensive due diligence, risk assessment, and risk management processes, we continually work to identify and address any potential vulnerabilities and instances of modern slavery.

We firmly believe that our collective efforts can make a meaningful difference in the fight against modern slavery and human trafficking. By working together, we can create a future business environment where everyone is treated with dignity and respect, free from exploitation.

Sincerely,

**Dr. Christine Munz**  
Chief Executive Officer

**Hans-Christian Stuff**  
Chief Financial Officer

# I. Our Organizational Structure, Business and Supply Chains

Eppendorf operates globally, with a diverse organizational structure that includes various entities, sales and service organizations, production sites, logistics locations, and calibration labs. We rely on the collaboration and support of our worldwide staff, with the EMEA region (Europe, Middle East & Africa) representing by far the largest share of our workforce.

The manufacturing and distribution of laboratory equipment and consumables require a dynamic and complex **network of suppliers**. Our supply chain includes over 8,000 direct suppliers, providing a wide variety of goods and services – such as raw materials (plastics, metals, glass, chemicals), electronics, optical products, and waste management. Most suppliers are based in the European Union, especially Germany. Another significant share is based in the United States.

## II. Our Groupwide Approach

To fulfill our human rights and environmental due diligence obligations, Eppendorf has established a risk management system that is continuously evaluated and further developed. The core elements are risk analysis, prevention, remediation, and complaints mechanisms, each subject to regular effectiveness reviews and adjustments. Due diligence obligations are also integrated into relevant business processes. The scope of due diligence covers the supply chain and our own business operations, including controlled group entities.

Responsibility for compliance with human rights and environmental due diligence obligations lies with the Chief Financial Officer (CFO). The CFO delegates his tasks to the Human Rights Officer (Senior Manager Human Rights, appointed on January 1, 2023), who reports to the Head of the Legal, IP & Compliance Department informs the Management Board directly at least once a year.

The tasks delegated to the Human Rights Officer include in particular:

- > Designing and implementing processes for human rights and environmental due diligence
- > Compiling information for annual reporting and the policy statement
- > Conducting communication and training measures
- > Monitoring the adequacy and effectiveness of risk management

Human Rights Coordinators and Ambassadors have been appointed for the relevant business functions and departments to implement risk management within their respective domains.

## a. Our Policies

We have implemented various policies to hold employees and business partners accountable for complying with anti-slavery standards. These policies include:

- 1. Code of Conduct:** Our Code of Conduct applies to all employees within the Eppendorf Group and outlines our expectations regarding human rights and environmental responsibility, including eliminating modern slavery as defined by the ILO.
- 2. Code of Conduct for Business Partners:** We expect our suppliers to comply with internationally recognized environmental and social standards, including anti-slavery requirements.
- 3. Human Rights Policy Statement:** Eppendorf commits to upholding human rights and maintaining ethical standards in its operations and supply chain including comprehensive risk assessment and accountability in the fight against modern slavery.

By implementing these policies, we aim to ensure compliance with anti-slavery standards throughout our operations and supply chains. The policies are communicated internally and integrated into our business process landscape and are available on our website.

## b. Our Due Diligence Approach

Identifying potential and actual negative human rights and environmental impacts is a central element of due diligence. We conduct annual and ad hoc risk analyses in our own business and with direct suppliers. For indirect suppliers, risk analyses are conducted on a case-by-case basis.

For our own operations, we begin with an abstract risk analysis based on location (country) and industry, utilizing publicly available information and indicators. If entities are identified as having an elevated level of abstract risk, a concrete analysis is conducted. This includes gathering information on existing global and local management systems through self-assessments and interviews. Additionally, risks are further specified, and relevant target groups are identified using supplementary qualitative and quantitative data. As a general principle, for concrete risks, the perspectives of relevant target groups are incorporated through comprehensive stakeholder engagement, such as through works councils, employee networks, or individual consultations.

For direct suppliers, an abstract risk analysis is conducted based on location (country) and industry. Suppliers with increased abstract risk undergo a concrete risk analysis via self-assessments. Based on the information, we determine an individual risk score for each supplier and identify risk general patterns across the supplier base.

For indirect suppliers, an ad-hoc risk analysis is initiated if Eppendorf obtains substantiated information about possible or actual human rights or environmental violations as a result of complaints or negative media reports. As a first step, we seek to engage with the relevant direct supplier. If the suspicion is confirmed, further individual measures are taken, each with the aim of preventing, ending, or minimizing the violation.

Risks or violations are documented in a risk inventory and prioritized based on the probability of occurrence, the (potential) severity, the number of people (potentially) affected, the (potential) irreversibility and the contribution to causation. A points system and a heat map are used for this purpose.

Based on the risk analysis, the responsible Human Rights Ambassadors derive preventive measures or – if violations are identified as part of the risk analysis - remedial measures.

If violations are substantiated, we respond promptly to rectify the situation. If the violation is identified at a direct or indirect supplier and cannot be immediately resolved, we jointly with the supplier develop a plan with clearly defined actions and timelines. If the breach is identified in our own business unit, it is terminated immediately. Furthermore, we are committed to diligently working towards restoring conditions to their prior state, wherever this is deemed achievable. If suppliers consistently fail to meet our ethical standards delineated in our Code of Conduct for Business Partners, we will reassess our business relationship.

Further, Eppendorf has established a system-based complaint mechanism aligned with the EU Whistleblower Directive. It allows employees and external stakeholders to (anonymously) report violations online, including potential human rights breaches. This also serves as an additional source of information for risk assessment. Our process protects those who report in good faith from retaliation.

We view human rights due diligence as an ongoing, adaptive process.

### **c. Risks Identified in Our Supply Chain and Our Own Operations**

The risk analysis for our **supply chain and our own operations** identified certain nations and sectors having a heightened risk of human rights infringements. However, we consider the risk of forced labor and modern slavery to be low in our own operations and low to medium in our supply chains, given the nature of our activities and suppliers.

Please refer to our Human Rights Policy Statement for more information.

## d. Preventive and Corrective Measures

To counteract risks, Eppendorf implements preventive measures in both our business units and the supply chain.

Preventive measures implemented in our own business operations that address forced labor and modern slavery include, in particular:

- (1) Code of Conduct,
- (2) General training and communication programs

The Eppendorf Code of Conduct is binding for all employees of the Eppendorf Group, i.e., for Eppendorf SE and its affiliated companies both in Germany and abroad. In our Code of Conduct, we have set out our expectations for our employees.

We consider raising awareness among our employees to be an important part of our due diligence obligations. We have therefore launched various communication and training programs to inform employees about our due diligence obligations and train them in accordance with their respective areas of responsibility. Employees in purchasing and supplier quality received training and comprehensive guidelines on evaluating suppliers with regard to human rights and environmental aspects.

Preventive measures implemented in the supply chain that address forced labor and modern slavery include, in particular:

- (1) Code of conduct for Business Partners and contractual assurances
- (2) Risk-based control measures as part of our supplier quality audits

The Eppendorf Code of Conduct for Business Partners forms the basis of our cooperation with suppliers. Accordingly, we provide our suppliers with the Code of Conduct and incorporate corresponding clauses into our framework agreements.

Risk-based control measures on human rights and environmental issues at our direct suppliers were integrated into our supplier quality audits. During the on-site visits, information provided as part of the risk analysis is checked for plausibility and compliance with preventive measures is verified, if applicable.

Eppendorf also participate in cross-industry initiatives and networks.

## e. Our Effectiveness

We review the effectiveness of our measures, the complaints procedure and the risk management system at least annually and additionally on an ad hoc basis. We also verify internal compliance with all requirements and processes.

To assess effectiveness of the measures, we define objectives and impact hypotheses for each measure when deriving the measures. We use the IOOI logic (Input – Output – Outcome – Impact) and develop qualitative and, where possible, quantitative indicators to verify the impact. If measures are found to be ineffective, we analyze the reasons and make adjustments as needed.

# Approval by the Management Board

This statement was approved by the Management Board on 07/01/2026, which reviews and updates it annually.



**Dr. Christine Munz**  
Chief Executive Officer



**Hans-Christian Stuff**  
Chief Financial Officer



Eppendorf SE  
Barkhausenweg 1  
22339 Hamburg  
Germany  
[humanrights@eppendorf.de](mailto:humanrights@eppendorf.de)  
[corporate.eppendorf.com](http://corporate.eppendorf.com)

Stand January 2026 / Version 2.0