

A photograph of a man and a woman in an office environment. The woman, on the left, has dark hair and is wearing a black and white vertically striped blazer. She is smiling broadly and looking down at a laptop. The man, on the right, has short brown hair and is wearing a white button-down shirt. He is also smiling and looking at the laptop. His hands are visible near the laptop. The background is a blurred office space with large windows. A blue horizontal bar is positioned behind the text box.

# Statement on Modern Slavery 2022

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This statement addresses the fiscal year 2022 (from January 1st to December 31st, 2022) 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, the issues of modern slavery and human trafficking pose significant challenges to society. These abhorrent practices violate the fundamental principles of human rights and dignity, and our collective responsibility is to address them head-on. As an organization operating in the US, the United Kingdom, Australia, and many other regions of the world, the Eppendorf Group recognizes the urgent need for action to combat modern slavery and human trafficking.

Modern slavery and human trafficking are grave crimes that exploit individuals for forced labor, servitude, or other forms of exploitation. They may affect vulnerable populations within our operations and throughout our global supply chains. We firmly believe that every person deserves

to be treated with respect, fairness, and dignity, and according to our purpose "to improve human living conditions," we are committed to ensuring that these principles are upheld in all aspects of our business.

At the Eppendorf Group, we are dedicated to operating transparently and ethically compliant with all applicable laws and regulations. We started to implement robust policies and procedures to prevent, detect, 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.

Thank you for your support and commitment to this critical cause.

Sincerely,

A blue ink signature of Axel Jaeger.

**Axel Jaeger**  
Chief Financial Officer

A blue ink signature of Dr. Wilhelm Plüster.

**Dr. Wilhelm Plüster**  
Spokesperson for the  
Management Board  
Chief Technology Officer

A blue ink signature of Dirk Loebermann.

**Dirk Loebermann**  
Chief Operating Officer

# I. Our Business and Organizational Structure

The Eppendorf Group operates in multiple sectors, focusing on providing and delivering innovative products and services in the field of life sciences. With a strong presence in the global market, Eppendorf engages in various aspects of the industry, including distribution, purchasing, marketing, and sales, as well as research and development.

**R&D and Production:** Eppendorf strongly emphasizes research and development to continuously innovate and introduce new technologies and solutions in the life sciences sector. We specialize in offering a wide range of high-quality laboratory equipment, consumables, and reagents to researchers, scientists, and professionals working in the life sciences sector. Our product portfolio encompasses laboratory instruments such as centrifuges, pipettes, shakers, bioreactors, thermal cyclers, and lab consumables like tubes, plates, tips, and PCR reagents.

**Purchasing:** As part of its operations, Eppendorf engages in strategic purchasing activities to ensure a reliable supply chain. We establish relationships with suppliers and manufacturers, focusing on sourcing high-quality materials and components for our products.

**Marketing and Sales:** Eppendorf employs comprehensive marketing and sales strategies to effectively promote its products and reach its target audience. Through targeted campaigns, product demonstrations, and educational initiatives, we raise awareness about the benefits and features of our innovative solutions. Eppendorf's sales teams work closely with customers, providing technical support and guidance to meet their needs.

**Distribution:** Eppendorf maintains an extensive distribution network of its own Sales and Service Organizations, collaborating with authorized distributors, dealers, and partners across different regions.

Overall, the Eppendorf Group operates in a multifaceted manner, encompassing R&D and production, purchasing activities, marketing and sales and distribution.

To uphold and sustain our premium brand products and services, Eppendorf relies on the collaboration and support of our worldwide staff. In 2022, 4,966 employees (full-time equivalent - FTE) were strategically allocated across diverse sectors and operational areas. Europe represents the largest employee segment, comprising 61.6% of the workforce. The Americas region accounts for 18.2% of employees, while the Asia/Pacific/Africa (APA) region constitutes 14.6%. Specifically, China contributes 5.6% of the total FTE count within the APA region.

Eppendorf operates globally, with a diverse organizational structure comprising various entities, sales companies, technology centers, production sites, logistics locations, and calibration labs. This structure enables us to serve our customers effectively and maintain high-quality standards across our operations. Below, you will find a comprehensive overview of our entities and their locations:



# International Presence

## Europe

- **Eppendorf SE**  
Hamburg/Germany
- Hamburg/Germany
- Oldenburg/Germany
- Landsberg/Germany
- Nijmegen/Netherlands
- **Eppendorf Belgium N.V. - S.A.**  
Aarschot/Belgium
- **Eppendorf Ibérica S.L.U.**  
San Sebastián de los Reyes (Madrid)/Spain
- **Eppendorf Nederland B.V.**  
Nijmegen/Netherlands
- **Eppendorf Nordic A/S**  
Hørsholm (Copenhagen)/Denmark
- Stockholm/Sweden
- **Eppendorf Norge AS**  
Oslo/Norway
- **Eppendorf Russia ooo**  
Moscow/Russia
- **Eppendorf Vertrieb Deutschland GmbH**  
Wesseling/Germany
- Berlin/Germany
- Heidelberg/Germany
- Penzberg/Germany
- **Starlab France S.a.r.l.**  
Orsay/France
- **Starlab International GmbH**  
Hamburg/Germany
- **Starlab GmbH**  
Hamburg/Germany
- **Starlab s.r.l.**  
Milan/Italy
- **Starlab (UK) Limited**  
Milton Keynes/UK
- Milton Keynes/UK
- **Eppendorf Austria GmbH**  
Vienna/Austria
- Vienna/Austria
- Tata/Hungary
- **Eppendorf Czech & Slovakia s.r.o.**  
Říčany (Prague)/Czech Republic
- Prague/Czech Republic
- Brno/Czech Republic
- Bratislava/Slovakia
- **Eppendorf France SAS**  
Montesson (Paris)/France
- **Eppendorf Poland sp. z o.o.**  
Warsaw/Poland
- **Eppendorf s.r.l.**  
Milan/Italy
- **Eppendorf UK Ltd.**  
Stevenage/UK
- Corby/UK
- **Vaudaux-Eppendorf AG**  
Schönenbuch (Basel)/Switzerland
- Schönenbuch (Basel)/Switzerland
- **Calibration Technology Ltd.**  
Limerick/Ireland
- Tipperary/Ireland
- **Eppendorf Logistics Netherlands BV**  
Nijmegen/Netherlands
- **Bio-ITech B.V.**  
Groningen/Netherlands
- **DASGIP Information and Process Technology GmbH**  
Jülich/Germany
- ▲ **Eppendorf Application Technologies S.A.**  
Namur/Belgium
- ▲ Hamburg/Germany
- **Eppendorf CryoTech Ltd.**  
Maldon/UK
- **Eppendorf Instrumente GmbH**  
Hamburg/Germany
- **Eppendorf Liquid Handling GmbH**  
Hamburg/Germany
- **Eppendorf Polymere GmbH**  
Oldenburg in Holstein/Germany
- Wismar/Germany
- **Eppendorf Zentrifugen GmbH**  
Leipzig/Germany
- ▲ **IDE.Automation GmbH**  
Lübeck/Germany

## Americas

- **Eppendorf Holding, Inc.**  
Enfield, Connecticut/USA
- **Eppendorf, Inc.**  
Enfield, Connecticut/USA
- Enfield, Connecticut/USA
- Cambridge, Massachusetts/USA
- **Eppendorf North America, Inc.**  
Enfield, Connecticut/USA
- Fresno, California/USA
- Framingham, Massachusetts/USA
- San Carlos, California/USA
- San Diego, California/USA
- Shrewsbury, Massachusetts/USA
- **USA Scientific, Inc.**  
Ocala, Florida/USA
- Ocala, Florida/USA
- **Eppendorf Canada Ltd.**  
Mississauga (Toronto)/Canada
- **Eppendorf do Brasil Ltda.**  
São Paulo/Brazil
- São Paulo/Brazil
- Puebla/Mexico
- **Eppendorf Manufacturing Corp.**  
Enfield, Connecticut/USA

## China

- **Eppendorf China Ltd.**  
Hong Kong/China
- Hong Kong/China
- Taipei/China
- **Eppendorf (Shanghai) International Trade Co., Ltd.**  
Shanghai/China
- Shanghai/China
- Beijing/China
- Guangzhou/China
- Hangzhou/China
- Jinan/China
- Nanjing/China
- Wuhan/China
- **Eppendorf Lab Technologies (Shanghai) Co., Ltd.**  
Shanghai/China

## Asia/Pacific/Africa

- **Eppendorf Asia Pacific Sdn. Bhd.**  
Kuala Lumpur/Malaysia
- Jakarta/Indonesia
- **Eppendorf Co., Ltd.**  
Tokyo/Japan
- Tokyo/Japan
- Fukuoka/Japan
- Osaka/Japan
- **Eppendorf Himac Technologies Co., Ltd.**  
Ibaraki/Japan
- Hokkaido/Japan
- Nagoya/Japan
- Osaka/Japan
- Fukuoka/Japan
- Tokyo/Japan
- **Eppendorf India Pvt. Ltd.**  
Chennai/India
- Chennai/India
- Bangalore/India
- Hyderabad/India
- Kolkata/India
- New Delhi/India
- Pune/India
- **Eppendorf Korea Ltd.**  
Seoul/South Korea
- Seoul/South Korea
- Daejeon/South Korea
- **Eppendorf Middle East & Africa FZ-LLC**  
Dubai/United Arab Emirates
- **Eppendorf South Pacific Pty. Ltd.**  
Macquarie Park (Sydney), New South Wales/Australia
- Sydney/Australia
- Auckland/New Zealand
- **Eppendorf (Thailand) Co., Ltd.**  
Bangkok/Thailand
- Bangkok/Thailand
- **Eppendorf Singapore Pte. Ltd.**  
Singapore
- Singapore

■ Head office

▲ Mechanical engineering site

■ Entity with regional/global sales, marketing, service and product portfolio functions

■ Sales company

■ Sales company and pipette calibration lab

● Sales office

■ Sales company and pipette calibration lab

● Sales office

● Sales office and pipette calibration lab

● Pipette calibration lab

▲ Service location

■ Technology Center for research, development and production

■ Technology Center for research, development and production with sales company

● Production site

■ Logistics location (warehouse and/or distribution center)

■ Logistics location (warehouse and/or distribution center) and pipette calibration lab

## II. Our Groupwide Approach

At Eppendorf, we have started to establish a clear framework to ensure compliance with our due diligence obligations related to human rights and will continue to do so in 2023.

The Chief Financial Officer, accountable to the Management Board, oversees human rights compliance throughout our business operations and value chain. The CFO will delegate monitoring responsibilities to the Senior Manager for Human Rights, who reports directly to the head of the Sustainability Department and provides regular updates to the Management Board.

The Senior Manager for Human Rights will have independent authority, access to internal information, and will be empowered to issue directives to ensure compliance with due diligence obligations. Adequate resources are allocated to support the Senior Manager for Human Rights in their duties, which include process implementation, annual reporting, communications and training, risk monitoring, and compliance measures. Human rights ambassadors will be appointed in relevant business areas and group entities and will work under the supervision of the

Senior Manager for Human Rights to implement risk management within their respective domains. This structured approach will enable us to identify, assess, and address modern slavery risks, fostering informed organizational decision-making.

# III. Our Policies Concerning Modern Slavery and Human Trafficking

At Eppendorf, we have implemented or will implement in 2023 various policies and measures to hold employees and contractors accountable for complying with anti-slavery and human trafficking 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 due diligence. It covers equal opportunity, workplace safety, human rights, labor standards, environmental protection, and the selection of business partners. It refers explicitly to eliminating modern slavery as defined by the ILO.
2. Code of Conduct for Supplier: We expect our suppliers to comply with internationally recognized environmental and social standards, including a commitment to anti-slavery and human trafficking standards. We expect that our suppliers affirm the absence of conflict materials, especially from the DR Congo or regions specified in the Dodd-Frank Act, and their adherence to applicable regulations to ensure responsible sourcing of minerals.
3. Procurement Policy: Our procurement policy ensures that the Code of Conduct for Supplier and further social compliance topics are adequately addressed in the whole procurement process, focusing on the qualification and auditing of prospective or existing suppliers.
4. Eppendorf Compliance Line: In November 2022 have established a system-based tool aligning with the EU Whistleblower Directive. This Compliance Line not only allows employees to report violations online, including potential human rights breaches but also facilitates anonymous reporting, ensuring the confidentiality of reported indications and suspicions. Our process safeguards individuals who provide information in good faith from extortion, intimidation, harassment, or other reprisals. Additionally, Eppendorf intends to utilize the tool as a complaint procedure in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz).
5. Human Rights Policy Statement: Eppendorf's commitment to upholding human rights and maintaining ethical standards in its operations and supply chain. Further, it will cover our dedication to comprehensive risk assessment and cultivating a culture of accountability, including the fight against modern slavery.
6. Preventive actions: We will initiate training and other educational measures to enhance the understanding of human rights and environmental due diligence of our immediate and high-risk suppliers.
7. Corrective actions: In the event of a human rights violation, we immediately address the issue and attend to the needs of affected individuals. We work with the responsible party, whether a direct or indirect supplier, to develop a plan with clear measures and deadlines to resolve the violation.

By implementing these policies and measures, we aim to ensure compliance with anti-slavery and human trafficking standards throughout our operations and supply chain. The policies are communicated internally, on our website, integrated into our business process landscape, and published in a specific process tool.



# IV. Our Risk Management and due Diligence Processes in Relation to Modern Slavery and Human Trafficking

To ensure compliance with our due diligence duties concerning human rights, Eppendorf has implemented a robust risk management system that includes the prevention of modern slavery and human trafficking as a specifically protected right. We have aligned our approach with the requirements outlined in IDW PS 980/981, the Institute of German Accounts Audit Standard. This evaluation extends to our internal operations and direct and indirect suppliers.

As outlined in Chapter II, “Our Groupwide Approach,” the Management Board will designate specific employees to oversee the implementation and monitoring of our risk management system. The Management Board ensures it remains informed by receiving updates on its work at least once annually.

## 1. Risk analysis of our supply chain

The manufacturing and distribution of laboratory equipment and consumables lead to a dynamic and complex network of suppliers. It involves a variety of products and services internationally. The extensive network stretched to a collaboration of over 3,000 direct suppliers. There is a vast variety of goods and services, including sourcing raw materials like plastics, metals, glass, and chemicals, manufacturing computers, electronic and optical products, and waste collection, treatment, and disposal activity.

Conducting an abstract analysis identified certain nations and sectors with heightened susceptibility to human rights infringements. High-risk industries in our supply chain include mainly the manufacturing of electrical equipment and computer, electronic, and optical products, and the suppliers are based in Asia, specifically Singapore, Malaysia, Taiwan, and Hong Kong.

Our risk analysis conducted in November 2022 identified increased risk in specific human rights domains and geographic locations. Notably, heightened or moderate risks were found concerning:

- > Non-discrimination
- > Freedom of association
- > Security forces’ violence
- > Child labor
- > Compensation

These risks may contribute to modern slavery practices and dangers and be primarily prominent in Asian, South American, and Middle Eastern countries.

The supply chain risks have been determined by using procurement and sales data from Eppendorf, utilizing an input-output model. Based on the total performance related to each location in EUR (purchasing, procurement, and investment costs for goods, materials, and services), country- and industry-specific supply chains were modeled for Eppendorf. The modeling with the input-output model reveals the countries and industries/sectors from which goods and services are directly procured (immediate suppliers) or indirectly obtained/produced in the supply chain for Eppendorf.

The modeling encompasses the entire supply chain and determines the estimated number of non-Eppendorf employees (FTE) employed in the supply chain to produce goods and provide services for Eppendorf per country/region and sector. Using this data and country-industry-specific risk indicators, the human rights risks per risk theme were identified on a scale from 1-4 (1=low, 2=medium, 3=high, and 4=very high). The results were aggregated by country and sector. For the risk of modern slavery and human trafficking, the following regions have been identified with a high risk:

Region	Countries	FTE	Risk Level
Turkey	Turkey	27	3 – high
Rest of Africa	Nigeria, Algeria, Morocco, Angola, Ethiopia, Kenya	7	3 – high
Greece	Greece	2	3 – high
Rest of Europe	Ukraine, Belarus, Serbia, Island, Bosnia, Albania	1	3 – high

We do not have any immediate (tier 1) suppliers in these high-risk regions. The statistic number of affected employees (FTE) thus is relevant for our indirect suppliers (tier 2-n).

For our own operations and the risk of modern slavery and human trafficking, the following regions have been identified with a high or medium risk:

Region	Countries	FTE	Risk Level
Thailand	Thailand	27	3 – high
Malaysia	Malaysia	69	2 – medium

However, due to the nature of our operations in these areas (high skilled office work in sales and service organizations), we deem the risk for our own operations as low.

## 2. Our risk assessment

Across our various entities, Eppendorf will collaborate with a dedicated team to facilitate practical cooperation and prioritize human rights risk management, both within our operations and throughout our extensive supply chain. Our commitment to these principles is firmly rooted in compliance with the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz), a pivotal legal framework designed to reinforce corporate responsibility throughout the supply chain. This legislation mandates adherence to binding policies and requires us to undertake comprehensive reviews of our supply chain. The primary objective of these reviews is to identify and subsequently mitigate risks associated with human rights and environmental concerns. In addition, the law necessitates the establishment of a robust complaint procedure that empowers stakeholders to voice their concerns, thereby promoting transparency and accountability. Furthermore, this legal framework impresses stringent monitoring measures, underscoring the importance of proactively preventing modern slavery and related violations throughout our supply chains.

Our supplier relationships are integrated into our comprehensive supplier risk management processes. An abstract risk analysis will be conducted in 2023, initially to segment suppliers based on location and industry. Suppliers showing potential risk during this analysis undergo a more detailed assessment, including gathering information on risk management and company data and checking for relevant certificates, such as ISO 14001, ISO 45001, and potentially SA8000, in the future. The data collection, abstract risk analysis, communication, and documentation are conducted on a supply chain management platform. Our assessment factors for enhanced attention will be based on, e.g., purchasing power and the potential to exert influence. We will proactively introduce preventive measures to strengthen human rights conditions in persistent potential risks.

Suspensions of future or occurred human rights violations within our supply chain can reach us through our complaint procedure. Further, our Senior Manager for Human Rights and the Compliance Office will confidently investigate and handle any reported incidents. Public reports will communicate the outcomes under the protection of confidentiality.

We regard implementing human rights due diligence as an ongoing, adaptive process that remains attuned to evolving conditions. Over the coming year, we aspire to enhance our monitoring processes. Additionally, we aim to expand our engagement with suppliers to gather pertinent information for second-step assessments.

### 3. Preventive and corrective measures

As we are committed to preventing modern slavery and human trafficking, we will implement preventive measures, such as training regarding supply chain due diligence concerning human rights. Further, the adaptation of a binding Code of Conduct, which applies to all members of the Eppendorf Group, outlines our expectations in various dimensions, including equality, workplace safety, and other human rights-related aspects.

#### Training

We plan to implement a comprehensive communication and training program to raise awareness and educate about human rights and environmental due diligence starting in 2024. The process involves training immediate suppliers on implementing the obligations outlined in the Code of Conduct. It mandates the mandatory participation of high-risk suppliers (as defined in IV.1) to safeguard human rights. After the identification of immediate suppliers, the following steps will be taken into account:

1. Code of Conduct for Supplier: Ensuring immediate suppliers have received and signed the Code of Conduct for Supplier, focusing on accountability measures and responsibility.
2. Assessment of High-Risk Suppliers: High-risk suppliers will be formally invited to participate in a training session. The training includes requirements and expectations outlined in the Code of Conduct, emphasizing the risk of modern slavery and human trafficking.
3. Training sessions: The design of the training sessions will start in 2024. The Senior Manager for Human Rights holds primary responsibility for its implementation. Duration and capacities are yet to be defined.
4. Verification of compliance: After the training, suppliers are required to demonstrate their commitment to compliance. This may involve self-assessment and on-site audits to verify their adherence to ethical and human rights standards.
5. The organization will maintain transparency by regular reporting on the outcomes of the training, compliance assessments, and corrective measures. This may be shared with stakeholders, customers, and the public to demonstrate commitment to human rights protection.
6. Continuous improvement: The process is dynamic and involves constant improvement efforts. Feedback from suppliers, lessons learned, and regulation changes are used to refine and enhance the training and compliance program.

This process aims to ensure that immediate suppliers are well-informed, high-risk suppliers receive assistance, and they are committed to and actively engaged in upholding human rights and ethical standards as outlined in the organization's Code of Conduct. The training aims to help mitigate risks associated with modern slavery and human trafficking and contributes to protecting human rights within the supply chain.

### On-site examination

We established the risk management procedure to implement due diligence processes. This involves continuous evaluation and improvement of Eppendorf's human rights management process and its supply chain, guided by annual and event-specific risk analysis. If our risk evaluation requests further (preventive) measures and compliance with our Code of Conduct for Supplier, an on-site examination may be necessary. In 2024, we plan to design cooperative pilot projects for on-site visits of our entities. This serves two objectives: first, to understand and mitigate risks in our own entities and, second, to simultaneously develop a framework for a regular examination process.

### Progressive stages of response

Despite our thorough precautions, we acknowledge that it is not feasible to eliminate the potential of human rights violations within our own business operations or supply chain. Recognizing this possibility, we have instituted a formal complaint mechanism for reporting such violations. If human rights violations are substantiated, we respond promptly and decisively to rectify the situation. Our approach is meticulously tailored, considering the specific requirements and considerations of those who may be affected. When the violator is identified as a direct or indirect supplier and immediate resolution proves unpractical, we will engage in collaborative efforts to construct a comprehensive plan, complete with clearly defined action, and establish timelines. We are legally bound to end human rights violations within our entities. We also explore partnering with relevant industry initiatives or organizations where applicable and impactful. Furthermore, we are committed to diligently working towards restoring conditions to their state before the occurrence of any violation, wherever this is deemed achievable. In cases where our suppliers consistently fall short of the ethical standards delineated in our Code of Conduct for Supplier, we may need to reassess the nature of our business relationships despite our ongoing collaborative efforts to address and rectify these concerns.



# V. Our Effectiveness

Continuous impact monitoring of our measures is critical to identify and restructure existing processes and redefining our procedures to ensure that we fulfill our legal obligations and ethical demands. We have yet to establish a meaningful KPI structure, including data collection processes, assessment procedures, evaluation of the complaints structure, awareness training efficiency, and on-site examinations to track our progress and effectiveness.

## Approval by the Management Board

This statement was approved by the Management Board on December 22, 2023 which reviews and updates it annually.



**Axel Jaeger**  
Chief Financial Officer



**Dr. Wilhelm Plüster**  
Spokesperson for the  
Management Board  
Chief Technology Officer



**Dirk Loebermann**  
Chief Operating Officer



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