

## Supplier Code of Conduct

Integrated DNA Technologies (“IDT”) and its subsidiaries are committed to conducting its business in an ethical, legal, and socially responsible manner. IDT expects its suppliers to share this commitment and thus operate in accordance with the principles defined in this Supplier Code of Conduct (“Code”). Although different legal and cultural environments may apply, suppliers must meet the following minimum requirements in order to sell goods or services to IDT.

IDT will assess its suppliers’ compliance with this Code, and any violations of this Code may jeopardize the supplier’s business relationship with IDT, up to and including termination. This Code applies to IDT suppliers and their subsidiaries, affiliates, and subcontractors (each a “Supplier”) providing goods or services to IDT.

### Compliance with Laws, Regulations, and Published Standards

IDT Suppliers must comply with all applicable laws, codes, or regulations of the countries, states, and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labor practices. Additionally, IDT suppliers must require their suppliers (including temporary labor agencies) to conform to the same standards.

### Labor Practices

#### Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor or involuntary prison labor: slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

#### Prevention of Underage Labor

Suppliers shall employ only workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher. Suppliers may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6



of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

### **Working Hours**

A workweek shall be restricted to 60 hours, including overtime, and workers shall take at least one day off every seven days except in emergencies or unusual situations. Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

### **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deduction from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

### **Antidiscrimination**

Suppliers shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices. Suppliers shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

### **Anti-Harassment and Abuse**

Suppliers shall commit to a workplace free of harassment and abuse. Suppliers shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

### **Freedom of Association**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation and join workers' councils as well as right of collective bargaining in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.



## Health and Safety

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and health work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

### **Occupational Health, Safety, and Hazard Prevention**

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out) and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained personal protective equipment. Workers shall not be disciplined for raising safety concerns.

### **Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

To the extent that Supplier transports goods for IDT into the United States, Supplier shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at [www.cbp.gov](http://www.cbp.gov) (or other website established for such purpose by the U.S. government).

### **Incident Management**

Suppliers shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Suppliers shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.



### **Ergonomics**

Suppliers shall identify, evaluate, and control worker exposure to tasks that pose ergonomic risk such as excessive force, improper lifting positions, or repetitiveness. Suppliers shall integrate this process into the qualification of all new or modified production lines, equipment, tools, and workstations.

### **Working and Living Conditions**

Suppliers shall provide workers with reasonably accessible and clean toilet facilities and potable water. Supplier-provided dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by Supplier or a third-party shall be clean and safe and provide reasonable living space.

### **Environment**

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

### **Hazardous Materials**

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### **Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

### **Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.



### **Environmental Permits and Reporting**

Suppliers shall obtain, keep current, and comply with all required environmental permits. Suppliers shall comply with the reporting requirements of applicable permits and regulations.

### **Pollution Prevention and Resource Reduction**

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

### **Ethics**

IDT expects the highest standards of ethical conduct in all of our endeavors. Suppliers shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

### **Business Integrity**

Suppliers shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

### **Disclosure of Information**

Suppliers shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

### **Intellectual Property**

Suppliers shall respect intellectual property rights and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights.

### **Identity Protection**

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistleblower confidentiality and prohibit retaliation.



### **Responsible Sourcing of Minerals**

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

### **Import Practices and Documentation**

Suppliers will not engage in any of the following behaviors when doing business with IDT:

- Purposely understate product value on commercial invoices to avoid the payment of duties/taxes on commercial transactions
- Declare an inaccurate country of origin or provide false/inaccurate descriptions or classifications of goods on paperwork
- Smuggle goods, or facilitate/assist with the smuggling of goods
- Falsify export/import documentation in any way or engage in customs fraud

### **Management System**

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

### **Company Statement**

Suppliers shall develop a company statement affirming its commitment to high standards of social and environmental responsibility, ethical conduct, and continuous improvement.

### **Management Accountability and Responsibility**

Suppliers will clearly identify company representative[s] responsible for ensuring the implementation of the management systems and associated programs. Senior management will review the status of the management systems on regular basis.



### **Risk Assessment and Management**

Suppliers shall develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics, and legal compliance risks associated with its operations; determine the relative significance of each risk; and implement appropriate procedures and controls to control the identified risks.

### **Improvement Objectives**

Suppliers shall have written standards, performance objectives, targets, and implementation plans, including periodic assessments of the performance against those objectives.

### **Audits and Assessments**

Suppliers shall perform periodic evaluations of its facilities and operations to ensure compliance with this Code and the law.

### **Documentation and Records**

Suppliers shall have processes to identify, understand, and implement applicable laws and regulations and requirements of this Code. Suppliers shall maintain documents and records to ensure regulatory compliance.

### **Training and Communication**

Suppliers shall develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill Supplier's continuous improvement objectives.

Suppliers shall have a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier supplier(s), and customers.

Suppliers shall have an ongoing process to obtain feedback on its practices related to this Code and to foster continuous improvement.

### **Corrective Action Process**

Suppliers shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.



## Export Sanctions/Terrorism Activities

IDT suppliers must abide by all economic sanctions or trade embargoes that the United States has adopted, whether they apply to foreign countries, political organizations, or particular foreign individuals and entities.

Suppliers will not directly or indirectly engage in or support any terrorist activity. Neither suppliers nor any of their affiliates, nor any officer or director of the supplier or any of its affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body, including but not limited to:

- (a) The U.S. Treasury Department's Specially Designated Nationals List (OFAC);
- (b) The U.S. Commerce Department's Denied Persons and Entity Lists (OFAC);
- (c) The United Nations List Pursuant to Security Council Resolution 1390 (2002) and Paragraphs 4(B) or Resolution 1267(1999) and 8(C) of Resolution 1333 (2000);
- (d) The European Union List Implementing Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

## Monitoring and Compliance

Suppliers shall conduct audits and inspections to ensure their compliance with this Supplier Code of Conduct and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier agrees to notify IDT's Purchasing Department as to its plans to remedy any such non-compliance.

IDT or its representatives will engage in monitoring activities to confirm Suppliers' compliance to this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess suppliers' performance. IDT's Approved Supplier List (ASL) will track each supplier's resulting risk level (e.g. Low, Med., and High).

Any IDT supplier or employee that becomes aware of violations of this policy is obligated to notify the Purchasing Department. Based on the assessment of information made available, IDT reserves the right (in addition to all other legal and contractual

Integrated DNA Technologies, Inc.  
1710 Commercial Park  
Coralville, Iowa 52241  
USA







rights) to disqualify any potential supplier or terminate any relationship with any current supplier found to be in violation of this Supplier Code of Conduct without liability to IDT.

[www.idtdna.com](http://www.idtdna.com)

Integrated DNA Technologies, Inc.  
1710 Commercial Park  
Coralville, Iowa 52241  
USA



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