



## Hologic, Inc. and Hologic Canada ULC

### Annual Report – 2023

This report is filed by Hologic, Inc. (“**Hologic**”) on behalf of itself and Hologic Canada ULC (“**Hologic Canada**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). The report describes the steps that the companies 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 by the companies during the previous Financial Year ending September 30, 2023 (the “**Reporting Period**”). The report also provides supplementary information as required by the Act.

### Structure, Activities and Supply Chains

Hologic, Inc. (“**Hologic**”) is a Delaware corporation listed on the NASDAQ and headquartered in Marlborough, Massachusetts. Hologic is the controlling entity of the Hologic group, which operates globally through its subsidiaries. Hologic Canada ULC (“**Hologic Canada**”) is a wholly owned subsidiary of Hologic and is incorporated under the laws of British Columbia. Hologic Canada is headquartered at 2400 Skymark Avenue, Unit 7-A, Mississauga, Ontario.

Hologic is an innovative medical technology business primarily focused on improving women’s health and well-being through early detection and treatment. Hologic develops, manufactures, and supplies medical imaging systems, diagnostic products, and surgical products. It offers products that aid the diagnosis of human diseases; imaging and related products and accessories; GYN surgical products, including endometrial ablation system and hysteroscopic tissue removal system; and skeletal health products such as dual-energy X-ray bone densitometry systems and mini C-arm imaging products. Hologic offers its solutions to hospitals, clinical laboratories, and healthcare providers. Hologic offers its products and services through direct sales and a network of independent distributors and sales. Hologic sources almost all of its inputs from medium to large corporations in organized and specialized sectors like microchips, electronic components molding, heavy chemicals and metal industry. Most of the suppliers serving Hologic manufacture their products in the United States or Europe. Hologic and its subsidiaries manufactures products at facilities in locations including the US, Costa Rica, UK, and France, with contract manufacturers in the US and Malaysia with reputed global multinationals. These products are imported into Canada by Hologic as well as Hologic Canada and sold within Canada by Hologic Canada and its distributors DynaTech.

### 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, including Hologic Canada:

- Reviewed and revised its supplier guidebook, including a chapter addressing forced and child labour.
- Undertook supply chain mapping. During this exercise, Hologic assessed suppliers of products that are at risk of being connected to forced and child labour because of their place of operations.

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- 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, including developing additional procedures to conduct a more thorough supply chain risk assessment that is expected to be completed by the end of fiscal year 2025.
- 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 and 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.

## The Risks of Forced Labour and Child Labour in Our Operations and Supply Chains

For Hologic or any medical devices company the biggest risk arising in its supply chain or business activities is in the extended upstream supply chain and suppliers. Hologic's suppliers are located in over 36 countries, and while none of Hologic's suppliers has been targeted as high risk, the main risk might reside deeper within the company's supply chain. Main risk commodities are electronic components.

In addition to contractual terms in the supply agreement that cover modern slavery including but not limited to child labor, Hologic has currently reviewed its supplier guidebook including a more comprehensive chapter regarding the issue, and in October of 2023, Hologic mapped its supply chain in order to comply with UFLPA, UK and Australia Modern Slavery Act; in this exercise, suppliers of products that are likely to connected to modern slavery and in regions of high incidents have been assessed. Hologic is in the process of creating additional procedures and conduct a more thorough supply chain risk assessment to be completed by the end of FY25.

Hologic has a formal process in place to identify potential risks in our supply chain. For more information on our supplier risk management processes, refer to our 2023 Sustainability Report available [here](#).

## Policies and Due Diligence Processes in Relation to Forced and Child Labour

Slavery, servitude, forced labour, child labour, bonded labour and human trafficking are issues of increasing global concern, affecting all sectors, regions and economies. Forced labour and child labour are unacceptable within the Hologic group's business and supply chains and both Hologic and Hologic Canada are committed to combatting these in our approach to business and human

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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.

Hologic and Hologic Canada are 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 forced or child labour.

Hologic has strong internal policies on whistle-blowing procedures, migrant labour policies, child labour policy, child protection policy, and supplier code of conduct, as described in more detail below. These policies and due diligence processes are applicable to all Hologic group entities and their supply chains, including Hologic Canada. These policies and processes are regularly updated to reflect changing laws and Hologic's internal governance process is focused on continual improvement by working with internal and external stakeholders.

## 1. Code of Conduct

Hologic's [Code of Conduct](#) articulates its support for fundamental human rights and its commitment to observing all applicable law, including those governing forced and child labour. Compliance with the Code of Conduct is mandatory for all Hologic group employees, including employees of Hologic Canada. The Code of Conduct is continuously monitored and is updated from time to time to ensure that we approach our responsibilities regarding human rights and fair working practices in an appropriate manner.

Violations of Hologic's Code of Conduct may be anonymously reported through [Hologic EthicsPoint Website](#).

## 2. Procurement and Contractual Controls

Hologic's 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 Hologic contracts include a clause in all contracts and purchase orders obligating suppliers to be in full compliance with all applicable governmental, legal, regulatory, and professional requirements, including those governing forced and child labour. Suppliers are also required to comply with Hologic's standards relating to forced and child labour, irrespective of the country where suppliers are based, or their supply chain is.

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To enable us to monitor compliance by our suppliers, we have deployed a self-assessment and self-audit process for our suppliers from March 2023. The suppliers/vendors must self-certify themselves as supporting corporate responsibility, procurement and ethical trade. Hologic reserves the right to audit our vendors operations and premises and their subcontractors against our standards and policies.

## **3. Supplier Code of Conduct**

Our Supplier Code of Conduct requires that all suppliers comply with the laws of their respective countries related to the environment, child labour, wages and hours, discrimination and gifts.

### **Supplier Audits**

Hologic conducts Supplier Audits (i.e., sample audits of suppliers and their supply chains) to assess compliance with its policies and responsible procurement program. The current assessment consists of mapping suppliers based on commodity and location. For all potential high risks, a supplier is requested to complete a questionnaire and based on the information provided, an assessment is completed and if warranted, a further audit will be conducted.

## **4. 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 anonymously raise issues concerning Hologic's operations, including 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.

### **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 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.

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## Training

All Hologic group employees and contractors linked directly to supply chain management are required to complete training related to identifying and reporting human trafficking as well as forced and child labour. Compliance training in relation to our Code of Conduct is required for all Hologic employees. Training and execution of our Code of Conduct is audited.

## How We Assess the Effectiveness of our Actions to Address the Risks of Forced Labour and Child Labour

Hologic is currently in the process of developing group policies and procedures to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

## Attestation and Approval

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*.



Per: \_\_\_\_\_

Name: Michelangelo Stefani

Title: Director

Date: 28<sup>th</sup> May 2024

*I have the authority to bind Hologic, Inc.*