

# Procurement Policy

Any procurement activity of QIAGEN must be conducted in alignment with this policy as well as with all applicable and local laws and regulations of countries where QIAGEN does business.

Purpose of the Procurement Policy is to ensure that all employees, especially employees in the Procurement organization, understand these guidelines and comply with them.

## 1. VISION

Procurement is the acquisition of appropriate goods and/ or services at the best possible total cost of ownership to meet the needs of the purchaser in terms of quality, quantity, time, and location.

Our vision is to transition QIAGEN's procurement towards leading practices by implementing global best-in-class procurement methods and standards in terms of processes and governance.

QIAGEN's procurement organization and its employees will support, help to further develop and push ahead QIAGEN's aims for independence, fairness and sincere business practice.

## 2. PROCUREMENT BUSINESS CONDUCT

In alignment with QIAGEN's Compliance Program (especially with QIAGEN's Corporate Code of Conduct and Ethics) every QIAGEN employee must conduct themselves honestly, fairly, and objectively in all business relationships with suppliers and all others with whom QIAGEN maintains business relationships.

Each employee should act in the best interests of the Company to the exclusion of personal advantage. Any procurement activity must be conducted in alignment with all applicable laws and regulations of countries where QIAGEN does business with.

For more detailed information or in case of uncertainty please refer to QIAGEN's Corporate Code of Conduct and Ethics (see also QIAGEN's Compliance Webpage (QIANet)).

### 2.1 QIAGEN Procurement Code of Ethics

This section is to be seen as an addition to the existing Corporate Code of Conduct and Ethics and does not replace it.

No purchases may be made by a QIAGEN employee if the purchased goods or services are for his/ her direct use and/or benefit.

In any case of business relations with its suppliers QIAGEN will:

- Compete with integrity.
- Treat all business partners (e. g. employees, and suppliers) honestly, fairly and objectively.
- Avoid any unfair or deceptive practice

QIAGEN expects a fair competition and the compliance with law and regulations and QIAGEN's policies. QIAGEN will select their suppliers strictly on merit. QIAGEN is committed to providing safe and healthy work environments and to being an environmentally responsible corporate citizen. QIAGEN upholds the policy to comply with all applicable environmental, safety and health laws and regulations, and does expect its suppliers to adhere to the same commitments.

### 2.2 Business Meals and Entertainment

We refer to the guidelines described in the Corporate Code of Conduct and Ethics under 3. A. Giving Gifts and 3. B. Receiving Gifts as well as in the Conflict of Interest Policy in the paragraph Acceptance of gifts and favors.

The following applies in particular: As to invitations QIAGEN employees have to obtain approval or decline any invitation to a business meal worth more than US\$ 125 (or the corresponding amount in local currency). Invitations to entertainment events (e.g. sports or theatre) or “all-expense paid” trips should be avoided unless explicitly approved ahead of time by the Head of Legal and Compliance. If approved by the Head of Legal and Compliance, to keep and support the independence, QIAGEN will reimburse related travel expenses as well as separately identifiable costs relating to an invitation to an entertainment event within the guidelines of QIAGEN's travel expenses. Personal guests (i.e. spouses, relatives, life companions, etc.) shall not attend any entertainment events including dinners unless also explicitly approved by the Head of Legal and Compliance. For employees of subsidiaries of QIAGEN Deutschland Holding GmbH: Invitations to business meals, entertainments or “all-expense paid” trips having a value of more than € 90 require approval of the Head of Legal and Compliance. If in certain circumstances it is not possible to ask for prior approval of an invitation or to exactly determine the value in advance, QIAGEN employees should use their reasonable discretion to assess if the value of the invitation will be in the range of US\$ 125 (or € 90) or beyond that threshold and if the value is commensurate with the circumstances. For the purpose of measuring value, the limits apply to each person separately, but the value of a function will be aggregated (for example: beverage, dinner and theatre on the same evening are considered a single function). In case of doubt, QIAGEN employees should (a) inform the business contact that the value of the invitation appears to be outside the scope of the QIAGEN policies and should suggest to choose a place with more reasonable prices or (b) pay for their own meal.

### 2.3 Transportation Costs

Please refer to QIAGEN's corporate and/or local Travel Policy for detailed guidance.

### 2.4 Gifts and Gratuities

We also refer to the guidelines described in the Corporate Code of Conduct and Ethics under 3. A. Giving Gifts and 3. B. Receiving Gifts as well as in the Conflict of Interest Policy in the paragraph Acceptance of gifts and favors.

The following applies in particular: Pursuant to QIAGEN's Code of Conduct, gifts, favors, entertainment or other inducements may not be accepted by employees or members of their immediate families from any persons or organization that does or seeks to do business with, or is a competitor of the Company, except as common courtesies usually associated with customary business practice. As to physical items, the acceptance of anything of a promotional nature and a token value, such as pens, calendars, ball caps or pads of paper is considered as customary business practice. If the gift is of more than a token value (for employees of subsidiaries of QIAGEN Deutschland Holding GmbH: gifts having a value of more than € 10) the Head of Legal and Compliance must approve its acceptance.

### 2.5 Soliciting Contributions

Employees must not solicit any donation or contribution from a supplier. Suppliers should never be allowed to fund or purchase tickets to QIAGEN events. In case it is considered appropriate for a supplier to participate in a QIAGEN event, the supplier shall only participate as a non-paying guest.

### 2.6 Conflict of Interest

Each employee has a duty to be free of relationships, activities or interests which conflict with, or appear to conflict with, the business interests of the company. It is essential that suppliers competing for QIAGEN's business have confidence in the integrity of QIAGEN's supplier selection process.

If a supplier or supplier representative is a known close personal friend or relative of any QIAGEN employee responsible for source selection or fair value determination, the QIAGEN employee should immediately resign from the specific assignment.

In addition, QIAGEN will not accept known former QIAGEN employees as suppliers or suppliers' representatives for a period of one year after their employment with QIAGEN has ended if one of the following criteria is met:

- The former QIAGEN employee is or might be in a position of negotiating directly with QIAGEN on issues pertaining to source selection or value determination.

- The former employee is or might be in a position to influence at the supplier.
- The former employee has a relationship with the decision-makers responsible for supplier selection or value determination.
- The former employee had access to significant, sensitive or confidential information related to the products or services being purchased which was not fully disclosed to competing suppliers.

Any event which may affect or may reasonably be deemed by others to affect a QIAGEN employee's impartiality in any matter relevant to their procurement duties must be declared to their manager immediately.

## 2.7 Reciprocity

It is QIAGEN's policy neither to buy nor to sell based upon reciprocity arrangements. Procurement should never change a sourcing decision based upon a supplier's purchases or lack of purchases from QIAGEN product/ service portfolio.

The Audit Committee as part of the Supervisory Board will review and approve all related party transaction.

## 2.8 Responsible Procurement

### 2.8.1 Scope

This standard applies to all QIAGEN procurement activities that pertain to the delivery of goods or services.

### 2.8.2 Roles and Responsibilities

Each member of the Executive Committee is accountable for ensuring that procurement activity within their area is carried out in a manner consistent with this standard.

The *Head of Legal and Compliance* is accountable for the governance and assurance of the Responsible Procurement and that skills and resources are in place to deliver the requirements of this Standard.

The *Head of Procurement* is responsible for implementing this Standard.

*Global Category Leaders* are responsible for ensuring that all Procurement activity within their category is

carried out in a manner consistent with this Standard, and that risks are being mitigated.

*Category Managers and Category Buyers* are responsible for ensuring that they conduct their sourcing activities in a manner consistent with this Standard.

Individually it is the responsibility of all employees to use established procurement processes, which have the requirements of this Standard integrated into them.

### 2.8.3 Expectations of Suppliers

#### 2.8.3.1 Global standard preventing bribery, corruption and conflicts of interest

- Suppliers do not offer, pay or accept bribes or permit sub-contractors or others to do so on their behalf.

This includes:

- Offering or giving – directly or indirectly – money or anything else of value to any person in order to obtain or retain business or secure any other improper advantage for themselves, their organization or QIAGEN
- Offering payments, gifts, hospitality, entertainment or anything of value if it could constitute a bribe.
- Suppliers do not allow personal or family interests to influence their independence or professional judgment.
- Suppliers have financial controls in place to prevent conflicts of interest affecting procurement and financial decision making.

#### 2.8.3.2 Non-discrimination and fair treatment

- Suppliers provide a workplace in which any form of harassment or discrimination is unacceptable.
- There is no restriction in recruitment, development and promotion based on race, gender, color, age, religion, sexual orientation, ethnic belonging, disability, political affiliation, union membership or marital status.

#### 2.8.3.3 Labour

- QIAGEN and all of its contracted Suppliers will not use child labor. The minimum age for employment is 15 years of age). If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies. Young workers under 18 shall not be employed at night or in hazardous conditions, or any kind of forced labor.
- Freely Chosen Employment: Suppliers do not use forced, bonded or indentured labor or involuntary prison or slave labour.

#### 2.8.3.4 Wages, benefits and working hours

- Suppliers pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.
- Suppliers communicate with the employee the basis on which they are being compensated in a timely manner.
- Suppliers are expected to communicate with the employee whether overtime is required and the wages to be paid for such overtime.
- Working hours comply with national laws and benchmark industry standards whichever affords greater protection.

#### 2.8.3.5 Research and Development ethics

Suppliers involved in the use or supply of human embryonic stem cells, genetic information, human biological sample or genetically modified microorganisms comply with the below:

- *Animal Research and Welfare:*

Suppliers comply with animal research and welfare requirements as stated in CIOMS (Council for International Organizations of Medical Sciences) - International Guiding Principles for Biomedical Research Involving Animals

- *Clinical Trials:*

Suppliers undertaking Clinical Trials ensure that trials are conducted in a manner compliant with the local ethics committee requirements. Suppliers ensure that they comply with the IFPMA (International Federation of Pharmaceutical

Manufacturers & Associations) Code of Pharmaceutical Marketing Practices, local laws, regulations and applicable codes of marketing practice in connection with interactions with Healthcare Professionals (HCP's).

#### 2.8.3.6 Freedom of Association

- Open communication and direct engagement with employees to resolve workplace and compensation issues is encouraged.
- Suppliers respect the rights of employees, as defined in local laws, to associate freely, join or not join labor unions, seek representation and join employees' councils.
- Employees are able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.
- Suppliers ensure that private or public security staff used is trained to respect the principles set forth herein.

#### 2.8.3.7 Safety, health and the environment

Suppliers implement a SHE management system ensuring that:

- Significant risks to safety, health and the environment are identified, assessed and controlled
- The manufacture and use of mercury, mercury waste or other hazardous or chemicals that are banned by applicable laws, regulations or conventions, or the export or import of hazardous waste is prohibited.
- Soil, water or air pollution or excessive water consumption are excluded.
- Emergency planning and response procedures are in place.
- People are protected from unhealthy exposure to physical, psychological, chemical and biological hazards.
- Information relating to SHE risks, chemicals and other hazardous materials, including pharmaceutical materials are available and used to manage risks.

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#### 2.8.3.8 Environmental protection and conservation

Business activities are managed in a way that, as far as practical, avoids the use of hazardous materials, conserves energy and other natural resources and minimizes the generation of waste through avoidance, reuse and/ or recycling.

Any emissions to air, water and land and the movement of hazardous materials must be in

compliance with laws and regulations and controlled or treated to the extent necessary to eliminate, or otherwise minimize the risk of, adverse effects on human health or the environment.

#### 2.8.3.9 Fair trade and competition

- Suppliers comply with trade regulations and restrictions of recognized national and international authorities.
- Suppliers only seek competitive advantage through lawful means and will conduct their business consistent with fair and vigorous competition.
- Suppliers only engage in dialogue with competitors when there is a legitimate business reason to do so, and the dialogue is such that it will not restrict competition (e.g. is limited to public or non-commercial information).
- If a supplier has a dominant or monopoly position, it will not abuse that position to exclude competitors or exploit customers.

#### 2.8.3.10 Protecting company and personal data

- Suppliers shall comply in all aspects of applicable data protection legislation including but not limited to the General Data Protection Regulation ((EU) 2016/679) (GDPR).
- Suppliers are transparent in their collection, use and retention of their own personal data. Further, they should only collect as much as is needed to accomplish their legitimate business purposes.
- Suppliers only share personal and confidential information with third parties if they have a legitimate need to do so and only where adequate safeguards are in place to protect that information in transit and whilst in the hands of the receiving parties.
- Suppliers assess the policies and controls in place at the third parties with whom they engage to ensure that they are suitable to protect confidential and personal information.

#### 2.8.3.11 Risk management and security controls

Suppliers ensure that effective security controls (both technological and physical) are applied to all personal information within their control to ensure the confidentiality of such information and the privacy of affected individuals. Information is protected and kept secure at all times from unauthorized use, damage, disclosure, diversion or removal, whether through accident, improper act or breach of trust.

#### 2.8.3.12

Suppliers ensure that their suppliers acknowledge and follow the principles set forth herein.

### 3. INTERACTIONS WITH GOVERNMENT OFFICIALS

Subject to compliance with all other corporate policies, employees of QIAGEN may engage a government official for consulting, speaking or honoraria services.

A government official is:

- Anyone who works for any government or for any government agency or department;
- Any person acting in an official capacity on behalf of a government or any department or agency;
- Any person who works for any company that is owned or controlled by any government or government department or agency (remember that in many countries many of our customers fit this description, e.g., hospitals, research institutes, or government owned companies);
- Any officer or employee of a public international organization such as the World Bank or the United Nations;
- Any political party or any official thereof; or
- Any candidate for political office anywhere in the world.

When engaging a government official to provide services as described above, please follow these guidelines:

- i. Any payment to the government official may not be made with the intention to obtain or retain business with his or her employer;
- ii. Have an approved consulting or similar agreement in place with well-defined terms

prior to the commencement of any  
services; and

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- iii. Receive prior written approval from the government agency authorizing the payment (this can be collected by the agency stamping the applicable agreement).

#### 4. APPROVAL THRESHOLDS

According to the contract value only appropriate sign-off authorities are allowed to sign contracts. The table below gives an overview about the thresholds and the respective internal approval authority, which is aligned with the Executive Committee Threshold decision and in accordance with the overall approval flow defined in the Budget Release Policy.



## APPROVAL THRESHOLDS

APPROVAL THRESHOLD (in US\$)	BUSINESS APPROVAL <sup>(1)</sup>	FINANCE APPROVAL	PROCUREMENT APPROVAL
≤ 25,000	Cost Center Owner	No formal approval needed	Category Buyer
> 25,000 and ≤ 100,000	Associate Director and above (QM/ QSM)	Business Controller	Category Manager
> 100,000 and ≤ 250,000	Executive Committee Direct Report with Budget Responsibility (QSM/ QLT)	Business Controller (QSM)	Category Leader
> 250,000 and ≤ 500,000	Executive Committee Member	Head of Controlling or Head of Accounting & Tax (QLT)	Category Leader
> 500,000 and ≤ 1,000,000	Executive Committee Member	Head of Controlling or Head of Accounting & Tax (QLT)	Global Head of Procurement
> 1,000,000 and ≤ 5,000,000	Executive Committee Member	Chief Financial Officer	Chief Financial Officer

(1) Equivalent levels to the cost center structure apply for projects and associated SAP WBS elements.

## 5. HUMAN RIGHTS

Respect for human rights is a fundamental value of QIAGEN. We strive to respect and promote human rights in our relationships with our employees, suppliers and stakeholders.

### Equal Employment

The Company values and promotes inclusiveness and diversity in all of its activities and is committed to creating a culture where all individuals have the opportunity to grow and contribute.

QIAGEN is committed to equal opportunity and are intolerant of discrimination and harassment.

The Company makes employment-related decisions without regard to a person's race, color, religious creed, age, sex, sexual orientation, gender identity or expression marital status, national origin, ancestry, or any other factor unrelated to a person's ability to perform the person's job.

"Employment decisions" generally mean decisions relating to hiring, recruiting, training, promotions and compensation, but the term may encompass other employment actions as well. The Company encourages its employees to bring any problem, complaint or concern regarding any alleged employment discrimination to the attention of the Human Resources Department. Employees who have concerns regarding conduct they believe is discriminatory should also feel free to make any such reports to the Head of Legal and Compliance.

### Non-discrimination and fair treatment

QIAGEN provides a workplace in which any form of harassment or discrimination is unacceptable.

There is no restriction in recruitment, development and promotion based on race, gender, color, age, religion, sexual orientation, gender identity or expression, ethnic belonging, disability, political affiliation, union membership or marital status.

The Company is committed to maintaining a collegial work environment in which all individuals are treated with respect and dignity and which is free of sexual harassment. In keeping with this commitment, the Company will not tolerate sexual harassment of employees by anyone, including any supervisor, co-worker, vendor, client or customer, whether in the workplace, at assignments outside the workplace, at Company-sponsored social functions or elsewhere.

More information can be found in QIAGEN's Harassment and Bullying Policy.

### Wages, benefits and working hours

QIAGEN pays employees in accordance with industry benchmarks in line with applicable wage laws, including minimum wages, overtime hours and mandated benefits.

Working hours comply with national laws and benchmark industry standards whichever affords greater protection.

### Freedom of Association

QIAGEN encourages an open communication and direct engagement with employees to resolve workplace and compensation issues.

QIAGEN respects the rights of employees, as defined in local laws, to associate freely, join or not join labor unions, seek representation and join employees' councils.

Employees are able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

### Labor

QIAGEN will not use child labor and will oblige its contracted suppliers to comply with the applicable minimal age restrictions in accordance with applicable laws and the International Standards of Child Labor.

Freely Chosen Employment: QIAGEN does not use forced, bonded or indentured labor or involuntary prison labor. QIAGEN has endorsed its official statement about the UK Modern Slavery Act 2015 ([Appendix 1](#)) globally.

### Safety, Health & Environmental

Health, safety, and environmental responsibilities are fundamental to the Company's values. QIAGEN's business activities are managed in a way that, as far as practical, avoids the use of hazardous materials, conserves energy and other natural resources and minimizes the generation of waste through avoidance, reuse and/ or recycling.

Any emissions to air, water and land and the movement of hazardous materials must be in compliance with laws and regulations and controlled or treated to the extent necessary to eliminate, or otherwise minimize the risk of, adverse effects on human health or the environment.

Employees are responsible for ensuring that QIAGEN

complies with all provisions of the health, safety, and environmental laws of the United States and of other countries where the Company does business.

The safety and health of our employees is of paramount importance. We aim to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. QIAGEN has a SHE management system in place so that:

- Significant risks to safety, health and the environment are identified, assessed and controlled.
- Emergency planning and response procedures are in place.
- People are protected from unhealthy exposure to physical, psychological, chemical and biological hazards.
- Information relating to SHE risks, chemicals and other hazardous materials, including pharmaceutical materials are available and used to manage risks.

### Protecting Company and Personal Data

QIAGEN complies in all aspects of applicable data protection legislation including but not limited to the General Data Protection Regulation ((EU) 2016/679) (GDPR).

QIAGEN is transparent in the collection, use and retention of personal data. Only as much as needed to accomplish the legitimate business purposes is collected.

QIAGEN only shares personal and confidential information with third parties if there is a legitimate need to do so and only where adequate safeguards are in place to protect that information in transit and whilst in the hands of the receiving parties.

QIAGEN assess the policies and controls in place at the third parties with whom we engage to ensure that they are suitable to protect confidential and personal information.

### Reporting: Non-Retaliation Policy

It is our responsibility to conduct ourselves in an ethical business manner and also to ensure that others do the same. If any one of us violates these standards, he or she can expect a disciplinary response.

If any breach of QIAGENs Corporate Code of Conduct and Ethics is known to you, you have to report it to the Head of Legal and Compliance based on the process described in the Reporting of Corporate Policy Violations policy.

Any employee who reports a breach in good faith may not be fired, demoted, reprimanded or otherwise harmed for, or because of, the reporting. QIAGEN prohibits any form of retaliation against an employee who complains, assists, or otherwise participates in the investigation of a complaint. The Company will endeavor to keep reports confidential to the fullest extent practicable under the circumstances.

If you experience any job-related harassment, the incident should be reported in good faith as a first step to your line manager or, if this is not an option, to your contact person within the Human Resources department or, if this is also not an option, as a final step to [compliance@qiagen.com](mailto:compliance@qiagen.com).

QIAGEN guarantees that such reports will be treated with full confidentiality and without any adverse action.

The Company will promptly and fairly investigate all complaints. The facts of each incident will determine the response to each complaint. Each situation will be handled in as private and confidential a manner as possible. If the Company determines that an employee is guilty of harassing another employee, appropriate disciplinary action will be taken against the offending employee, up to and including termination of employment.

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## Appendix 1

### QIAGEN Ltd Statement about the Modern Slavery Act 2015

QIAGEN Ltd is committed to ensuring that it understands the issues addressed by the Modern Slavery Act 2015 ("MSA 2015") and takes appropriate measures to stay compliant with the MSA 2015, ensuring that no modern slavery exists within QIAGEN Ltd or its supply chains.

QIAGEN's ultimate parent company (QIAGEN N.V.) is headquartered in the Netherlands with offices across the globe, including the UK (QIAGEN Ltd). QIAGEN is always working to ensure QIAGEN conducts business well within the realms of the MSA 2015. In addition to this, QIAGEN feels it is every employee's personal responsibility to help QIAGEN remain compliant with the MSA 2015 and it reflects this in its Sustainability Position and Procurement Policy.

QIAGEN is always endeavoring to ensure that its employees and suppliers, both current and prospective are able to understand the importance of complying with the MSA 2015 and therefore allow QIAGEN to comply at all times. QIAGEN's own supplier contracts contain modern slavery language, attempting to build this way of working into the very contractual relationship between the parties to keep modern slavery away from QIAGEN's doors and its supply chain. In addition to the foregoing, QIAGEN has been committed to carrying out business in line with the UN Compact, committed to the highest upholding of human rights, labour rights, environmental protection and anti-corruption action.