



abcam

Abcam distributor code of conduct

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Abcam distributor code of conduct

"Ethical conduct from each of us is essential and non-negotiable at Abcam. This means that as we live our values, including being customer focused, open and collaborative, we live them in an ethical way. Doing so is the only path to being the trustworthy partner to help life scientists discover more, faster."

Alan Hirzel, Chief Executive Officer





Abcam's commitment to doing business in an ethical way

Abcam's ambition is to become the most influential life science company for researchers worldwide. We want to be valued for the high quality research tools we provide and trusted for the way in which we work. Underpinning our ambition is Abcam's reputation for ethical business practices and high standards of integrity.

We are focussed on developing our trading partnerships and continually improving the value and integrity of those relationships. Abcam promotes innovation and strives for quality, product offerings and product availability to support our customers in their research.

Our customers require Abcam to adhere to strict standards when providing them with goods and services. Our distributors are an integral part of helping us to supply high quality research tools to researchers and it is important that our distributors adhere to the same strict standards as they do.

We expect our distributors to follow all applicable laws and regulations in the countries in which they operate as distributors for Abcam. As part of this, we expect our distributors to demonstrate a culture that reinforces ethical and lawful behaviours and ensures all aspects of their business comply with all applicable laws and regulations, both in the country in which the distributor operates, and in the country where it delivers Abcam's products to customers.

We have developed this code of conduct for distributors so that it is clear how we expect our distributors to do business. This code of conduct applies to all distributors irrespective of geographical location, but if local laws, regulations or standards in the country a distributor operates are stricter than this code of conduct, the distributor must always follow those stricter rules. Our distributors are required to agree to comply with this code of conduct in their distribution agreements with Abcam.



Anti-bribery and corruption

At Abcam, we have a zero-tolerance approach to bribery and other form of corrupt business behaviour.

We expect our distributors likewise to have a zero-tolerance approach to bribery and corruption and to comply with applicable anti-bribery and anti-corruption laws, regulations and industry standards. As Abcam is headquartered in the United Kingdom, this includes complying with the UK Bribery Act 2010 in addition to applicable local laws, for instance, for our distributors in China, the Anti-Unfair Competition Law and the Criminal Law of the People's Republic of China. We require our distributors to make an annual certification of anti-bribery compliance.



Our expectations of distributors include the following:

- Distributors must not bribe any person or organisation, whether private, public or governmental, and distributors shall not accept any bribes. No intermediaries, such as agents, advisers, distributors or any other business partners, may be used to commit acts of bribery on the distributor's behalf.
- No facilitation payments are permitted, irrespective of whether or not local law permits them.
- Gifts, hospitality, and entertainment should be modest, reasonable and infrequent, so far as any individual recipient is concerned. They should never be offered or provided with the intent of causing the recipient to do something favouring the distributor and/or Abcam or to refrain from doing something disadvantaging the distributor and/or Abcam.
- We expect distributors to have policies or guidelines in place that define under which circumstances, or within what limits, employees can receive gifts or favours from external companies with whom the company does business.
- If a distributor chooses to make political contributions, they must be made in compliance with all applicable laws, regulations and industry codes and standards, and must not be made with the expectation of direct or immediate return for the distributor or Abcam.
- Our distributors must keep accurate and up to date books and records that document accurately and in reasonable detail all matters relating to the distributor's business with Abcam, accounting for all payments made and received and all other advantages given and received by the distributor in connection with any agreements with Abcam.
- Abcam may audit distributors at any time upon reasonable prior notice to ensure their compliance with these standards and to confirm all payments made by Abcam and to third parties.
- We expect our distributors to work with their business partners to ensure that they comply with the above expectations.



Promotion of Abcam's products

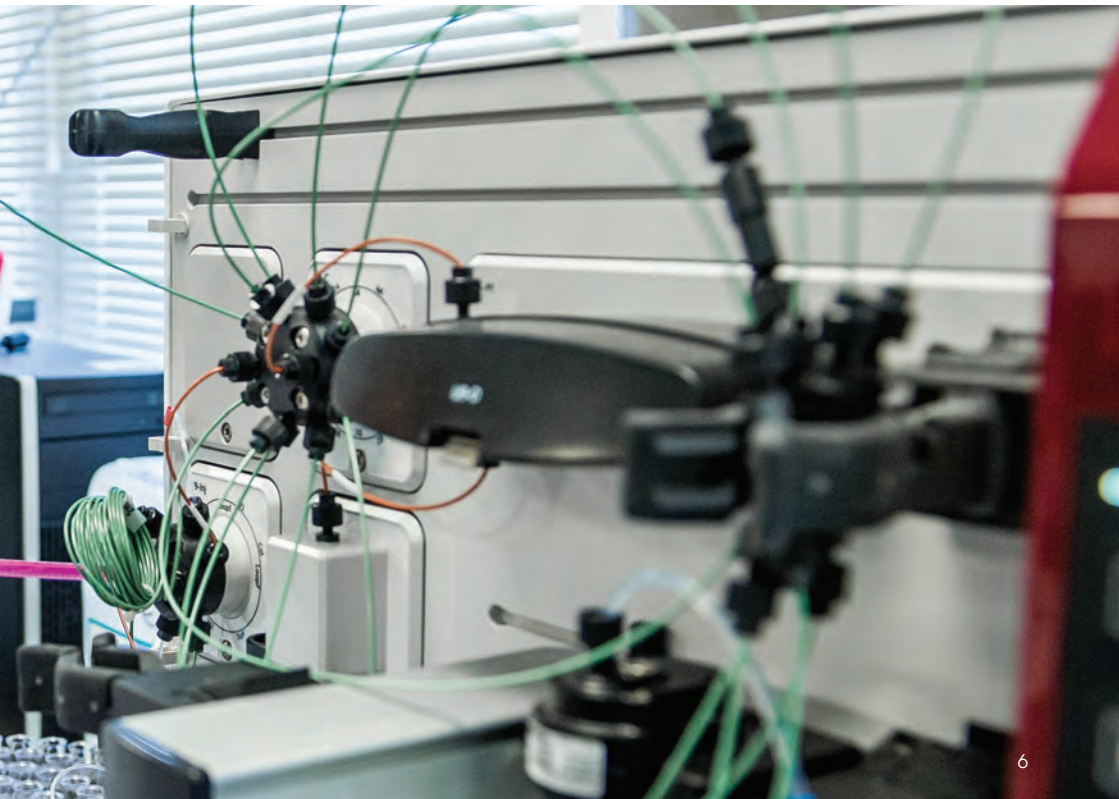
We expect our distributors to compete fairly and not to undertake any misleading, deceptive or anti-competitive practices when promoting or selling Abcam's products. No claims or statements about the quality or specificity of Abcam's products can be made without Abcam's prior approval. Any comparisons between Abcam's products and those of third parties must be fair. Products labelled as "Research use only" must not be promoted or sold for diagnostic or therapeutic use.





Sanctions, export controls and import licences

It is important that our distributors understand and conduct their business in full compliance with all applicable sanctions and export control laws and regulations, including, but not limited to, compliance with restrictions on the movement of funds, products, goods, materials, services, software, and technology governed by those laws. It is also important that our distributors obtain and maintain all relevant import licences.





Employment practices

Abcam takes its responsibility to protect human rights very seriously. We expect our distributors to uphold the human rights of workers and maintain a culture of dignity, respect and equal opportunities.

Modern slavery

As we are headquartered in the United Kingdom, we are subject to the Modern Slavery Act 2015, and are required to ensure that slavery and human trafficking is not taking place in our entire supply chain, even if it is outside of the UK.

We do not tolerate slavery or human trafficking in our distribution chain. We will never knowingly deal with any organisation which is connected to slavery or human trafficking.

Distributors must not use child labour in circumstances such that the tasks performed by any such child labour could be reasonably foreseen to cause with physical or emotional impairment to the development of such child. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment and the age established for completing compulsory education.

Distributors must not use forced labour of any kind, including prison, indentured, bonded or enslaved labour. Acts of human trafficking are also prohibited. Distributors are required to monitor any third party which assists them in recruiting or hiring employees, to ensure that people seeking employment at their facilities are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views.

Non-discrimination

Distributors shall provide a workplace free of harassment and discrimination. Discrimination for reasons of race, colour, age, sexual orientation, ethnicity, political affiliation, marital status, religion, disability or gender must not be tolerated.

Fair treatment

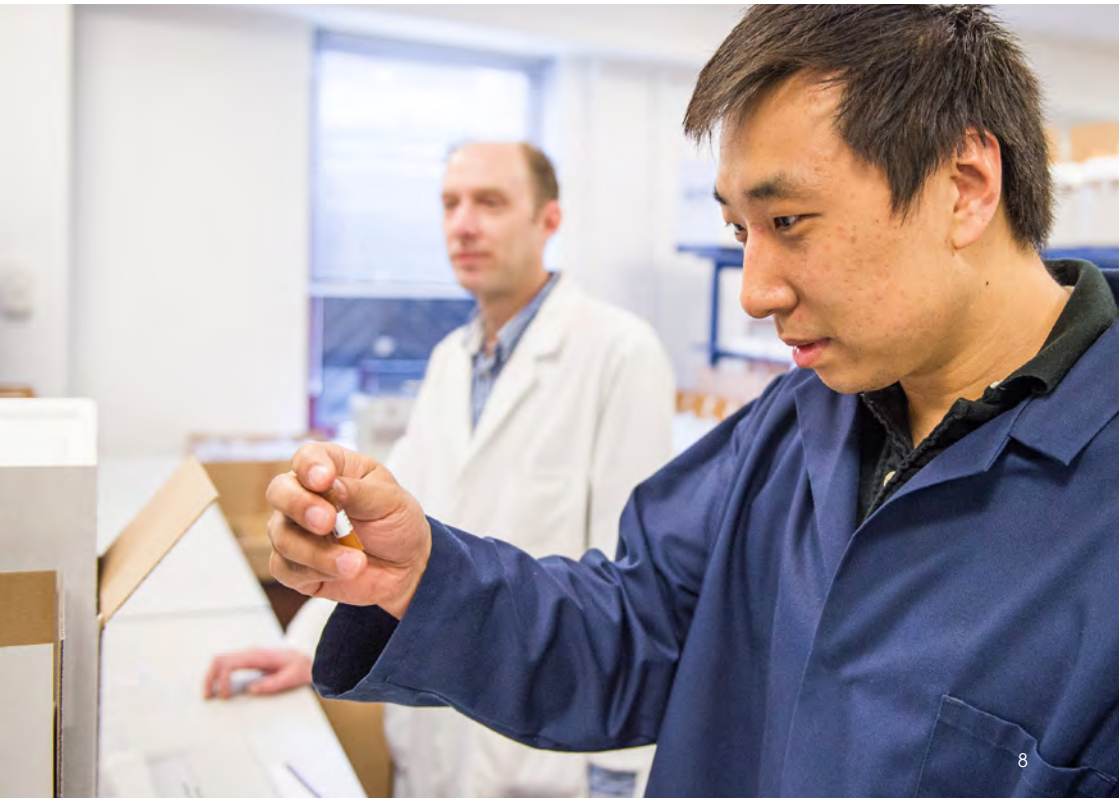
Distributors shall provide a workplace free from corporal punishment, mental, physical, sexual or verbal abuse and must not use cruel or abusive disciplinary practices in the workplace.

Wages, benefits and working hours

We expect our distributors to pay each employee a fair wage and provide each employee with all legally mandated benefits. Distributors must also comply with the laws on working hours and employment rights in the countries in which they operate.

Freedom of association

We require our distributors to be respectful of their employees' freedom of association and right to join and form independent trade unions.





Health and safety

We expect our distributors to carry out business in an environmentally responsible manner and promote a safe and healthy workplace for all of their employees, including for any company-provided living quarters and for those who work on their behalf worldwide.

Distributors shall:

- protect workers from over exposure to chemical, biological and physical hazards, physically demanding tasks
- have programmes in place to prevent or mitigate catastrophic releases of chemicals
- identify and assess emergency situations, and minimize their impact by implementing emergency plans and response procedures
- make available information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – to educate, train and protect workers from hazards.



Environment

We require our distributors to manage business activities in a way that, as far as practical, conserves and protects natural resources and minimises the generation of waste through avoidance, reuse and/or recycling, in compliance with applicable environmental laws and regulations.



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