

How we do things at Abcam

Our Code of Conduct

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HOW WE DO THINGS AT ABCAM

“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

Since Abcam was founded, trust has been a fundamental element of our business. Indeed, Jonathan Milner started our company because as a researcher he struggled to find products that he trusted. Hence Abcam was born. Since then, our mission has stayed focused on serving life scientists to achieve their mission, faster.

Over the years the company grew and we developed our constitution which guided our business through our evolution and growth as we welcomed new colleagues on board. We are now a large global business operating in many different markets and with colleagues around the world, and it is time to stand back and look at things again.

Our 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. It is therefore important that each of us consistently acts with integrity and fairness in everything we do.

This document is our code of conduct and reflects best practice changes in the outside world (regulation and compliance) and is also an evolution of how we want to run our business. This Code of Conduct (the "*Code*") defines who we are as a company, how we make decisions, what standards we expect and how we behave amongst ourselves and with others. We have a team of great people at Abcam who work hard and usually behave to the highest standards. This Code helps guide decisions around areas where we may be unsure of what to do. It also explains the consequences if we do not behave to these standards.

Our commitment to doing business ethically involves all of us – our Board of Directors, Executive Leadership Team, senior managers, supervisors and employees. That's why this Code has been discussed and approved by our Board of Directors, and should be read and understood by every employee. It is also a living document and will be reviewed regularly. We welcome suggestions on how to improve the Code, including better explanations or even ideas of what else we should include.

Please feel free to send suggestions to compliance@abcam.com, to a member of the Legal Team, or via Speak Up on Discover.

How we do things at Abcam applies to everyone working for any Abcam company in any capacity around the world. When we refer to employees, we are including all employees, directors, officers, temporary staff, agency workers, seconded workers and interns, wherever located, and regardless of employment status. It also includes contractors and external consultants in the performance of their duties for Abcam. In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our "principal financial officers."

Our General Counsel leads the Legal Department and has primary and day-to-day responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any queries about it, and monitoring compliance activities. You may contact any lawyer in the Legal Department, or email compliance@abcam.com to contact the General Counsel.

FOLLOWING LAWS AND REGULATIONS

Each employee and director has an obligation to comply with all laws, rules and regulations applicable to Abcam's operations. Laws and regulations can sometimes be difficult to understand and interpret, so if you are unsure of the law on a given topic, please speak to your line manager or contact the Legal Department.

To conduct our business in an ethical way we have to make sure we follow both the letter and the spirit of the laws that apply to us. It also requires everyone to deal fairly and responsibly with our customers, suppliers, competitors and employees, and no one connected to Abcam should take unfair advantage of anyone by manipulation, misrepresentation or abuse of information. This does not mean that we should not try to negotiate a good deal for Abcam, but means that we should not say something we know to be untrue.

As Abcam is headquartered in the UK, all Abcam employees are bound by the UK Criminal Finances Act 2017¹, UK Bribery Act 2010², and the Criminal Justice Act 1933³ regardless of which country we live or work in. We are also subject to the Foreign Corrupt Practices Act⁴ in our dealings with third parties.

¹ The **UK Criminal Finances Act 2017** came into force in 2017 and requires that Abcam, its suppliers, and their respective employees and agents shall comply with all tax laws and not commit any tax evasion offence anywhere in the world when acting for or on behalf of Abcam.

² The **UK Bribery Act 2010** came into force in July 2011 and covers bribery to or on behalf of UK companies, UK citizens and bribery outside of the UK for the benefit of a UK company, and covers both commercial bribery and bribery of government officials. It has four main offences: (1) bribing another person; (2) being bribed by another person; (3) bribing a foreign public official; and (4) the failure for an organisation to prevent bribery.

⁴ The **Foreign Corrupt Practices Act 1977** (FCPA) prohibits giving or offering money, gifts or anything of value to a foreign government official to obtain business. It also contains obligations for the recordkeeping and internal controls for companies that issue US securities (e.g. stocks and shares).

SPEAK UP HOTLINE AND PORTAL

All employees and directors have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to the Abcam. Although normally most people will raise concerns or queries with their manager, you may feel more comfortable about asking for guidance or reporting potential issues in other ways. Raising questions and concerns is crucial to ensuring our company does the right thing. If you are aware of something that does not seem right, you have a responsibility to raise the issue, even if you are not certain and do not have proof that something unethical or illegal has occurred. The important thing is that you raise your concerns so that it can be fairly and suitably investigated.

Speak Up is an ethics reporting service provided by Abcam to enable employees to ask questions or report concerns confidentially and anonymously. There is the option of calling a local number on the Speak Up Hotline at 0-800-89-0011 or doing it in writing by using the Speak Up Portal at [EthicsPoint - Abcam plc](#). Speak Up is managed by a third party called EthicsPoint and is not staffed by Abcam employees. Details can be found on Discover at Workspaces>SpeakUp. Your identity will not be divulged to Abcam without your permission.

If you raise a question or report a concern via Speak Up, any information you provide will be kept private and will be shared only with the Abcam individuals necessary to answer your question or investigate a reported issue. If you do not feel comfortable providing your name when using Speak Up, you may report a concern anonymously.

Alternatively, you may also ask questions or report concerns directly to your line manager, the HR or Legal Departments, or by sending an email to compliance@abcam.com.

Anyone who asks a question or reports a concern in good faith will be fully supported by the management team and will not be subject to any retaliation or reprisal, in accordance with our Whistleblowing Policy.

Any person who violates this Code or effects any retaliation or reprisal against an employee or director because the employee or director, in good faith, sought help or filed a report will be subject to appropriate disciplinary action, which could include termination of services.

ANTI-BRIBERY AND CORRUPTION

We have a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter bribery and corruption.

All forms of bribery and corruption are prohibited at Abcam. Bribery is a form of corruption and is defined as the offering of anything of value to an individual for the purpose of inappropriately influencing a business decision or gaining an unfair business advantage.

Some examples of things that may constitute bribery and corruption, depending on the circumstances, include the following:

- providing cash or gifts to an individual or family members
- inflated commissions
- fake consultancy agreements
- a hiring decision
- a favour
- political or charitable donations and sponsorships

Bribery is a criminal offence in most countries. In addition to Abcam's disciplinary processes, individuals found guilty of bribery can be fined personally or even imprisoned. What may be thought of as common business practices can be seen as bribery if they are abused. For example:

- excessive or inappropriate entertainment
- paying travel expenses of partners / spouses
- inappropriate non-business related travel

Importantly, even the offer of a bribe is unlawful under the UK Bribery Act 2010, regardless of whether or not it is accepted.

Corporate gifts and hospitality

We recognise that the act of giving and accepting gifts can be part of building normal business relationships. However, some gifts and hospitality can create improper influence or a feeling of obligation and could therefore be viewed as bribes. Our Gifts and Hospitality Policy sets out the principles by which all gifts and hospitality must comply in order to be permitted. If in doubt you should ask the Legal or HR Departments before offering or accepting any gifts or hospitality. Alternatively, you can raise a question via Speak Up or email compliance@abcam.com.

“Facilitation payments” are prohibited under the UK Bribery Act 2010. So even though they are permitted in some countries, they are expressly forbidden regardless of the local law. Facilitation payments are also known as “grease payments” or “back handers” and are typically small payments to secure or expedite a routine or necessary action, for example by a government official. They are also expressly prohibited under our Gifts and Hospitality Policy, even if they are under the applicable threshold limit for the relevant country.

We take our legal responsibilities very seriously. If Abcam fails to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts in the UK and EU, and damage to our reputation. From a legal perspective, payment of a bribe through a third party has the same effect as making the bribe directly. In these situations, Abcam and the individual concerned would face the same civil and criminal charges as if the payments were made directly by Abcam. It is therefore imperative that all Abcam employees follow the guidelines set out here. As a company we will also make sure that we carry out appropriate due diligence on our business partners.

All employees are required to undergo training at least once a year to ensure they are aware of the types of corruption and bribery, the risks of engaging in corrupt activity and bribery, and how they may report suspected corruption and bribery. This training will be provided by Abcam through the Learning Management System (LMS).

FINANCIAL AND BUSINESS RECORDS

As a public company we are subject to various securities laws, regulations and reporting obligations. Both applicable law, regulation and stock exchange rules and our policies require the disclosure of accurate and complete information regarding Abcam's business, financial condition and results of operations. Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business and guide our business decision-making and strategic planning. Our records include, but are not limited to, financial records, business records, personnel records, records relating to our technology, manufacturing and distribution, supplier lists and all other records maintained in the ordinary course of our business. All such records must be complete, accurate and reliable in all material respects. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage our company and result in legal liability.

Financial records

Abcam's financial records must contain accurate, reliable and non-misleading information as we are required to provide timely, accurate and complete financial information to our shareholders and the stock market. This means that:

- financial records must accurately and fairly reflect the complete transaction or situation documented in the record
- financial records should be approved only after we have addressed any questions and verified the accuracy of the record
- financial records should not be altered without appropriate approval
- no false or misleading entries or statements should be made in Abcam's financial records for any reason
- no undisclosed or unrecorded fund or asset of Abcam shall be established for any purpose
- no payment on behalf of Abcam shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents or entries supporting that payment
- financial commitments should not be entered into without approvals from the appropriate people, in accordance with the signing limits in force.

Our principal financial officers and other employees working in the finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

If you have any information or knowledge of any unrecorded fund or asset, inaccurate financial records, or commitments entered into without appropriate approval, you must promptly report it directly to compliance@abcam.com or via Speak Up.

Business records

We must also recognise the importance of business record creation and be aware of the risks involved. “Business records” include Abcam emails, presentations, website content and even draft documents and handwritten notes.

Any of our records could be viewed by unintended recipients and may be misconstrued or taken out of context. This is true especially of emails as we are often less precise in emails than business reports. All records, unless subject to legal privilege (i.e. confidential communications with a lawyer), may also be subject to compulsory disclosure to regulatory bodies or in litigation.

Here are some guidelines to help you when creating a business record:

- think before writing and decide whether it is necessary to create a record (e.g. an email) as often a conversation is more efficient and less open to misinterpretation
- make sure that the record is in compliance with applicable law
- be factual and accurate, do not make assumptions and avoid misleading and suggestive wording
- never create a document for which we would not be prepared to take responsibility
- be mindful of the recipients of a record and also aware that documents may be forwarded to unintended recipients
- do not share a record with recipients, especially externally, if there is no need for them to have access to it

Litigation

Records that relate to any actual or imminent legal or regulatory proceedings must be retained as they may be subject to compulsory disclosure –this is called a “legal hold.” Any records subject to a legal hold must be retained until it is lifted and no-one is permitted to destroy them.

If you receive a document that is stated to be subject to legal privilege, please do not forward it to anyone other than a member of our Legal Department.

Document retention

You also need to follow any formal document retention policy of Abcam with respect to company records within your control. Please contact your line manager or the General Counsel with any questions concerning any such policy.

PUBLIC COMMUNICATIONS

We place a high value on our credibility and reputation in the community. What is written or said about Abcam in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data.

Abcam has adopted a separate Policy Statement – Guidelines for Corporate Disclosure (the “**Corporate Disclosure Policy**”) to maintain Abcam’s credibility and reputation in the community, to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. This Corporate Disclosure Policy designates certain individuals as “spokespersons” who are responsible for communicating with analysts, institutional investors and representatives of the media. Any employee or director who is not a designated spokesperson under this Corporate Disclosure Policy may not communicate any information about Abcam to analysts, institutional investors, other shareholders or representatives of the media, except at the request of the designated spokespersons.

Please contact Abcam’s General Counsel with any questions you may have about disclosure matters.

CONFLICTS OF INTEREST

We all share a responsibility to make decisions and take actions that reflect the best interests of Abcam. It can be difficult for us to make business decisions when our own interests are involved, or when we find ourselves unable to be objective in the course of performing our job. We must remove ourselves from negotiations or from making decisions that could be, or could be perceived as having been, influenced by a conflict of interest.

A conflict of interest arises when an employee's or a director's personal interests interfere, or give the appearance of interfering, with the interests of Abcam. A conflict of interest can arise whenever you, as an employee, officer or director, take action or have an interest that prevents you from performing your duties and responsibilities honestly, objectively and effectively. Conflicts of interest are fairly common and can usually be easily remedied if reported at the outset. It is therefore important to disclose any potential conflict as soon as we become aware of it. You can do this by raising it with your manager or by sending an email to compliance@abcam.com. All potential conflicts of interest will need to be recorded on your personal file.

This Code does not attempt to describe all possible scenarios that could be or give rise to a conflict of interest, however, the following are examples of situations that could lead to an actual or perceived conflict of interest:

- holding a significant interest (financial or otherwise) in a company that is, or that the individual, knows or suspects is, a customer, supplier or competitor of Abcam or a company with which Abcam may enter into a potential business relationship;
- pursuing a business interest personally that competes with the business of Abcam;
- receiving personal gifts or hospitality that does not comply with our Gifts and Hospitality Policy;
- participating in outside employment with, or providing services to, a customer, supplier, competitor or business partner of Abcam;
- hiring family members and personal friends; and
- serving on a Board or committee of any entity, including not-for-profit / charitable organisations, whose interests may conflict with those of Abcam.

In addition, relationships with family members and friends can create a conflict of interest if the family member or friend does any of the above or is involved in a transaction with Abcam.

Abcam requires that you disclose any situation that reasonably would be expected to give rise to a conflict of interest. Any questions about, or reports of, a potential conflict of interest should be directed to compliance@abcam.com. You can also ask a question via Speak Up.

All transactions that would give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Board of Directors or a duly authorized committee thereof, and any such approval will not be considered a waiver of this Code.

CORPORATE OPPORTUNITIES

As an employee or director of Abcam, you have an obligation to advance Abcam's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with Abcam, you should first present the business opportunity to Abcam before pursuing the opportunity in your individual capacity. No employee may use corporate property, information or his or her position with Abcam for personal gain or to compete with Abcam while employed by us.

You should disclose to your supervisor the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your supervisor will contact Abcam's General Counsel and the appropriate management personnel to determine whether Abcam wishes to pursue the business opportunity. If Abcam waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

COMPETITION AND FAIR DEALING

Competition and anti-trust laws around the world are designed to protect fair market competition by controlling practices that could potentially have an anti-competitive effect on the market. When dealing with competitors, we need to be conscious of the information we share and avoid even the appearance of collusion.

Abcam employees must not engage in the following activities involving competitors:

- discussing or sharing confidential information including our current or planned pricing terms, contract terms, marketing strategy, digital strategy, distribution channels or supplier relationships
- coordinating pricing terms or agreeing to divide customers, colluding on tenders or to raise overall product cost in the market
- agreeing to boycott or exclude a customer or supplier
- obtaining a competitor's confidential information through improper or unethical means.

When dealing with customers, distributors and other parties, we must not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. We must not behave in an anti-competitive way such as setting a minimum resale price for our products. It is important that we compete fairly on the basis of fact. We must not make false, misleading or deceptive claims about our products and services in any document, including our website, promotional materials and marketing emails. We must not leave out important facts or make false claims when comparing our products to those of our competitors.

Any questions related to competition laws should be referred to the Legal Department or to compliance@abcam.com.

EXPORT AND TRADE SANCTIONS

Certain countries and parties are subject to trade and economic sanctions by various governments of countries in which Abcam operates. These may prohibit sales, research, manufacturing and other commercial relationships such as providing support on any Abcam product that has been purchased through an unauthorised distributor. It is important to know this so that Abcam complies with all applicable international trade laws.

Export controls prohibit, control or limit transfers of both products and information among certain countries.

Any questions related to maintaining compliance with international trade laws should be directed to the Legal Department or to compliance@abcam.com.

SAFEGUARDING CONFIDENTIAL INFORMATION

Our culture of openness means that many of us have access to sensitive confidential information and/or trade secrets. This information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to Abcam or its collaborators, customers or suppliers. We must be careful when dealing with confidential information and ensure we protect any such information that we may come across whilst performing our jobs. We respect and protect the confidential information of our customers, suppliers, business partners, competitors and employees, and the confidential information of Abcam.

We also have a duty to safeguard all confidential information of Abcam or third parties with which Abcam conducts business, except when disclosure is authorized or legally mandated, and disclosures of confidential information should be made in accordance with the Company's Guidelines for Corporate Disclosure and applicable law. Unauthorized disclosure of any confidential information is prohibited.

This means that we should even be careful about sharing confidential or sensitive business information whether it is proprietary to Abcam or another company, internally, and we should only share confidential information with individuals at Abcam who need to know the information for legitimate business purposes necessary to perform their responsibilities for Abcam.

Accidental or unintended disclosure of our confidential information could negatively impact our business, competitive situation and intellectual property rights, and may also breach our contractual obligations. Our customers, suppliers and business partners equally value their own confidential information, and we have an obligation to safeguard their confidential information from unauthorised disclosure.

An employee's and director's obligation to protect confidential information continues after the individual leaves Abcam. Unauthorized disclosure of confidential information could cause competitive harm to Abcam or its collaborators, customers or suppliers and could result in legal liability to you and the Abcam.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to Legal Department.

SAFEGUARDING INTELLECTUAL PROPERTY

Abcam views its patents, trademarks, copyright, database rights, trade secrets and domain names as valuable assets to enforce and exploit. As well as obtaining registered intellectual property rights, such as patents for our inventions and trademarks for our key brands, we also treat our processes and customer information as trade secrets.

We respect the intellectual property rights of third parties and expect our employees to take the intellectual property rights of third parties into due consideration in their daily work, and follow advice given by the Legal Department.

If you have any concerns or questions regarding the intellectual property of Abcam or third parties, please speak to a member of the Legal Department. You should never discuss intellectual property issues with colleagues by email unless you are asking for advice from a member of the Legal Department.

SAFEGUARDING COMPANY ASSETS

You should protect Abcam's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness and waste have a direct impact on Abcam's financial performance. The use of Abcam funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

You should be aware that Abcam property includes all data and communications transmitted or received to or by, or contained in, Abcam's electronic or telephonic systems. Abcam property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, Abcam has the ability, and reserves the right, to monitor all electronic and telephonic communication.

PERSONAL DATA

The protection of personal data such as contact information, dates of birth, credit card data, areas of research and identity details, e.g. passport number or identity card number, is regulated by data protection and data privacy laws around the world. We recognise that the correct and lawful treatment of personal data is vital to maintain confidence and trust in Abcam.

Our data privacy standard, How we do Data Protection at Abcam, sets out what we expect from Abcam's employees, contractors, agency workers, and consultants, to ensure that Abcam complies with all applicable data privacy laws, including the European Union General Data Protection Regulation (GDPR) and UK Data Protection Act 2018.

If you suspect that there has been any unauthorised disclosure of personal data, please contact IT.Help@abcam.com immediately.

COMPLIANCE WITH INSIDER TRADING LAWS

In our jobs at Abcam many of us will have access to non-public information about, directly or indirectly, Abcam and other companies that may be sufficiently material such that there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision, or it would significantly alter the total mix of information available to investors. This is referred to as “material non-public information.” Examples include, but are not limited to, financial results and information about possible acquisitions, important licensing agreements and other collaborations.

Consistent with Abcam’s Share Dealing Policy , our employees and directors are prohibited from trading in the stock or other securities of Abcam while in possession of material non-public information about Abcam. In addition, Abcam employees and directors are prohibited from recommending, inducing, “tipping” or suggesting that anyone else buy or sell Abcam’s shares or other securities (e.g. options) on the basis of material non-public information. Employees and directors who obtain material non-public information about another company in the course of their duties are prohibited from trading in the shares or securities of the other company while in possession of such information or “tipping” others to trade on the basis of such information.

You are required to read carefully and observe our Share Dealing Policy , as amended from time to time. If you are unsure whether you have access to inside information and whether you are permitted to deal in Abcam shares, please contact the Legal Department or

compliance@abcam.com.

CHARITABLE AND POLITICAL DONATIONS AND SPONSORSHIP

Abcam is committed to playing a positive role in the community through charitable donations and sponsorships which are administered through site Charity Committees. All charitable donations and contributions, whether made directly or indirectly, must comply with applicable laws and must not be made to improperly influence the recipient or in exchange for any business advantage. They must also be approved and allocated in advance by the relevant Charity Committee in accordance with any policies in place from time to time.

Requesting or authorising payments on behalf of Abcam to a government or public official, political party, candidate or incumbent for political office is prohibited unless prior authorisation has been obtained from the General Counsel who will determine whether or not the proposed payment is permissible under applicable law and Abcam's Gift and Hospitality Policy.

WORKING TOGETHER

We believe the skills, innovation, integrity and commitment of our employees are the source of Abcam's scientific leadership and competitive strength. We value the contributions of every individual and treat one another with dignity and respect regardless of position or role within Abcam.

Abcam is committed to providing an inclusive work environment in line with equal employment opportunities for all applicants and employees and ensuring that the workplace is free from discrimination and conduct which violates the rights of employees to dignity at work, and free from harassment, bullying and a hostile work environment. Any behaviour that undermines this commitment is unacceptable.

Our policies are in place to ensure we are compliant with local employment laws and prohibit all forms of discrimination based on age, disability, race, national origin, ancestry, religion or belief, gender identity, sexual orientation, marital status, pregnancy and maternity, veteran status, genetic information, or any other basis protected by country, state or local regulations. Further information can be found in the appropriate local policy relevant to where you are employed. Discriminatory behaviour is contrary to our values and may result in disciplinary action, up to and including termination of employment.

We do not tolerate any form of harassment, bullying and / or threatening and intimidating behaviour at Abcam in the work place or at work-related functions held either on or off Abcam's premises. Further information can be found in the appropriate local policy related to where you are employed.

If you witness conduct that does not comply with the above, it should be reported to your manager, HR or via Speak Up.

OUR WORKING ENVIRONMENT

Abcam is committed to providing a safe working environment for all employees with consistent health and safety standards across our global sites. As well as complying with local legal requirements, all sites are required to conform to global best practice standards which are continuously evolving and progressed by our health and safety network consisting of safety representatives from all of our sites.

We are all responsible for our own safety as well as the safety of our colleagues. Safety committees are located within every site to coordinate site-wide activities, implement new ideas, maintain standards and organise well-being events. Health and safety training is part of our induction process for all staff. Global annual audits are undertaken at all sites using internal cross-site audit methodologies supported, where appropriate, by external consultants. These audits ensure compliance, drive standards forward and provide a framework whereby staff can see how standards at their site compare with others around the globe.

We strive to efficiently use natural resources and to minimise environmental impact through sustainability efforts. Employees are encouraged to support environmental sustainability efforts.

If you have any concerns regarding the work environment, please speak to your line manager, any member of the safety committee at your site, HR or report it via Speak Up.

FAIR WORKING CONDITIONS

We are subject to and fully support the UK Modern Slavery Act 2015⁵. We do not tolerate slavery or human trafficking in our organisation or in our supply chain and we will never knowingly deal with any organisation which is connected to slavery or human trafficking. We commit to provide our employees with fair and competitive wages based on performance and ethical conduct.

If you have any concerns regarding your working conditions, please speak to your line manager, HR or report it via Speak Up.

⁵ The Modern Slavery Act 2015 came into effect in 2016 and requires Abcam to take “appropriate steps” to ensure that slavery and human trafficking are not taking place in our global business or supply chain.

SUPPLIER QUALITY MANAGEMENT

As part of the manufacturing and delivery of our product portfolio we partner with a number of third party suppliers. We select suppliers that adhere to our standards and monitor their performance through audits, reviewing the progress of any corrective action plans and measuring of key performance indicators.

We expect our suppliers to follow high quality and ethical standards in accordance with applicable local laws.

Our suppliers must not use forced, involuntary or child labour, and must comply with applicable health, safety and environmental standards.

Abcam is committed to achieving high standards of animal welfare. Our suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals. We have high ethical standards in our sourcing activities and decisions, and consider ways to replace animals entirely by alternative means, reduce the numbers of animals used or refine procedures to minimise distress.

Suppliers of material derived from humans must comply with applicable laws and regulations regarding the procurement, use and storage of human tissues, and must have been sourced with full prior informed consent and without financial reward.

If you have any concerns regarding our supplier quality management, please speak to your manager, contact the SVP Global Supply Chain and Manufacturing, or report it via Speak Up.

WAIVERS

Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board of Directors or a duly authorized committee of the Board of Directors and will be disclosed to the public as required by law or the rules of The Nasdaq Stock Market, and other applicable rules and regulations. Waivers of this Code for other employees may be made only by our Chief Executive Officer and General Counsel and will be reported to our Audit and Risk Committee.

CONCLUSION

This Code contains general guidelines for conducting the business of Abcam consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact the Legal Department or to compliance@abcam.com. Abcam expects all of its employees and directors to adhere to these standards.

This Code, as applied to Abcam's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Abcam policy. Abcam reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.