

Element Biosciences

Modern Slavery Disclosure Statement 2024

Purpose

This statement is published by Element Biosciences, Inc., on behalf of all relevant subsidiaries (collectively, “**Element**”), for the purposes of meeting Element’s obligations under section 54 of the UK Modern Slavery Act 2015. This statement relates to the fiscal year ending 2024.

Element is committed to conducting its business lawfully and with integrity and to continually strengthen its practices that seek to eliminate slavery, servitude, forced or compulsory labor, and human trafficking (collectively, “**Modern Slavery**”) from any part of its supply chains and global operations. We seek to ensure that our suppliers, distributors, and other vendors (together “**Partners**”) do not use Modern Slavery in any of its forms in providing goods or services to Element. Key aspects of Element’s current controls on Modern Slavery appear in this statement.

Organization Structure and Supply Chains

Element Biosciences is a multi-disciplinary startup focused on innovating genomic and multi-omic analysis tools for the research markets. Founded in 2017, our headquarters is located in San Diego, California. Our mission is to empower the scientific community with more freedom and flexibility to accelerate our collective impact on humanity. We have over 300 employees.

Element’s main manufacturing facilities are in the United States. We source components for our products, design parts, prototype parts, software and manufacturing equipment from countries across the Americas, Asia, and Europe. We currently have over 30 distributors whom we consider key components of our global supply chain.

Applicable Policies

Element is committed to conducting its business in compliance with all applicable laws and regulations, and with the highest ethical standards. We have therefore adopted several relevant policies applying to key stakeholders:

The **Element Code of Conduct** applies to all full time, part time, and temporary Element employees, as well as contractors, consultants, and officers of the company (“**Personnel**”). It provides a standard guide for what is required of everyone at Element. Certain sections also apply to members of Element’s Board of Directors. Element expects its Partners to follow these principles when providing products and services to Element or acting on our behalf. The Code of Conduct requires Element Personnel to (i) bring our company expectations regarding legal and ethical conduct to the attention of all Partners (including expectations regarding Modern Slavery), (ii) perform due diligence when choosing Partners to ensure that they meet Element’s standards, and (iii) be vigilant for any signs that third parties are violating legal or ethical requirements, including local employment and safety laws.

Element’s Supplier Business Conduct Policy applies to all of Element’s suppliers and requires suppliers to comply with standards relating to various issues, including Modern Slavery, human rights, and labor rights as well as environment and health and safety. Suppliers are expected to ensure that their own subcontractors comply with the standards set out in the policy.

Working with Partners

Element seeks to build relationships with Partners who share our commitment to satisfying all legal, ethical, and human rights obligations. We favor competitive Partners who are proactive in contributing to the continued education, fair treatment, working conditions, and betterment of employees and who provide equal employment opportunities.

Element is committed to respecting human rights and to treating every person with dignity and respect and we expect our Partners to do the same. As set out in our Element Code of Conduct, Element expects our Partners to act in accordance with all applicable laws and regulations and internationally recognized human rights standards, including

the United Nations Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

We do not knowingly do business with Partners who employ Modern Slavery, regardless of whether such practices are permitted by applicable law.

Verification and Due Diligence

Element performs due diligence when choosing Partners to verify that they meet our standards, as set out in our Supplier Business Conduct Policy and Distributor Business Conduct Policy, as applicable. Our due diligence includes conducting risk assessments when on-boarding new Partners and conducting periodic assessments of performance. We additionally implement contractual and procedural safeguards to monitor compliance with our human rights expectations for Partners.

Element is committed to ensuring that it has appropriate grievance mechanisms in place so that employees and other stakeholders are able to raise concerns about conduct in our supply chains and global operations that might suggest use of Modern Slavery or other applicable laws and regulations. To that end, the Element Code of Conduct directs all employees and Partners to report potential violations or concerns through a variety of channels, including to our legal team.

Supply Chain Contractual Controls, Audits, and Certification

Element requires by contract that its suppliers and Distributors comply with applicable laws and regulations. We share our Supplier Business Conduct Policy and Element Code of Conduct Policy, which describes Element’s expectations for legal and ethical conduct, with all suppliers and distributors and are vigilant for any signs that third parties are violating legal or ethical requirements, including local environmental, employment, and safety laws.

Training of Internal Stakeholders

Element requires annual training on its Code of Conduct for all employees, as well as training on other company policies. Training is conducted through Element’s internal systems and training records are documented for all employees.

As Element expands its business activities and works with suppliers domestically and globally, Element remains committed to human rights and safety and ensuring that no Modern Slavery is involved in our operations or supply chain.

Molly He



Chief Executive Officer
Element Biosciences, Inc.