



Neogen Corporation  
Supplier Standards of Business Conduct

Table of Contents

1. Introduction and Expectations
2. Neogen Corporation Statements and Policies
3. Labor
4. Quality, Health and Safety
5. Ethics and Business Practices
6. Management Systems

1. **Introduction and Expectations:** This Supplier Code of Business Conduct defines the principles and requirements of Neogen for all its suppliers of goods and services, all its subcontractors, as well as their suppliers and subcontractors.

Neogen is committed to achieving the highest standards of ethics, integrity, and performance to provide the products and solutions necessary for our customers. These Supplier Standards of Business Conduct set forth the fundamental requirements that we expect our suppliers (and those who work for them, including employees and subcontract labor) to comply with at all tiers. These Supplier Standards of Business Conduct also apply to our third-party distributors, contract laborers, and any other third parties performing or providing materials or services on the behalf of Neogen.

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com

A Supplier must maintain the highest standards of ethics and integrity and comply with the laws, regulations, its contractual obligations with Neogen and this Supplier Standards of Business Conduct.



Our suppliers must always act ethically and ensure the integrity of their operations. Acting with integrity means being accountable for the highest standards of behavior. In addition, our suppliers must fully comply with all applicable laws and regulations, their contractual obligations with us and these Supplier Standards of Business Conduct.

Neogen expects all its suppliers and subcontractors to share the principles which are expressed in this Supplier Code of Business Conduct. Moreover, we expect our suppliers to replicate these standards further down the supply chain.

The Supplier Code of Business Conduct is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how sustainability should be practiced in the day-to-day business.

## 2: Neogen Mission Statement and Policies

### Neogen Mission Statement

The mission of NEOGEN Corporation is to be the leading company in the development and marketing of solutions for food and animal safety.

### Neogen Corporation Quality Policy

Neogen Corporation is committed to the design, manufacture, and distribution of effective food and animal safety solutions. It is the goal of the organization to satisfy the stated and documented customer needs and expectations for our products. We are dedicated to the continual improvement of our quality management system.

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



## Neogen Corporation Procurement Statement of Policy

The policy of Neogen is to obtain the best value for the materials, goods, and services that it purchases from, and to maintain best practices with the highest ethical standards in dealing with and negotiation with its suppliers. Value includes price, quality, service, and delivery.

## Neogen Corporation Procurement Code of Ethics

- Neogen individuals involved in Procurement decisions will avoid any private or professional activity that would create a conflict between personal interests and the interests of Neogen.
- Neogen individuals involved in Procurement decisions will not accept money, bribes, gifts, entertainment favors, or services from potential or present suppliers which might influence procurement decisions.
- Neogen individuals involved in Procurement decisions will grant all competitive suppliers' equal consideration when obtaining quotes and refrain from sharing quoted numbers between competing suppliers except in an open RFQ environment.
- Neogen individuals involved in Procurement decisions will conduct business with potential and present suppliers in an atmosphere of good faith and never conduct intentional misrepresentation.
- Neogen individuals involved in Procurement activities will conduct all activities in accordance with the guidelines while staying attentive to and advising Neogen about the legal ramifications of the purchasing decisions.
- Neogen individuals involved in Procurement activities will promote positive supplier relationships through all phases of the quoting and procurement cycles and process.
- Neogen individuals involved in Procurement activities will enhance the proficiency and stature of the procurement profession by maintaining the highest standards of ethical behavior.

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



### **3: Labor Expectations of Neogen Suppliers**

Neogen expects our suppliers to treat individuals with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture. Suppliers must refrain from violating the rights of others and address and adverse human rights impacts of their operations.

#### **Child Labor Avoidance**

Neogen expects our suppliers to ensure that child labor is not used in the performance of their work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

#### **Human Trafficking**

Neogen fully supports the elimination of human trafficking and slavery from the supply chain, and we do not tolerate any trafficking in persons, both in the United States and globally. Neogen Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate.

#### **Harassment**

Neogen suppliers should ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

#### **Non-Discrimination**

Neogen suppliers should provide equal employment opportunity to all employees and applicants for employment without any unlawful discrimination.

#### **Fair Treatment and Wages**

Neogen suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. Suppliers must not, under any circumstances, use, promote or otherwise give rise to the use of forced or involuntary labor. Such labor can include, without limitation, practices



such as restricting people's movement, withholding wages, or identity documents to force them to stay on the job. Suppliers shall ensure that workers understand their rights about payment of wages, overtime, and retention of identity documents. The suppliers will ensure that workers are treated fairly, and their rights are respected.

### **Applicable Laws**

Neogen suppliers and their subcontractors must comply with all applicable laws and regulations of the Government authorities having jurisdiction over their facilities, operations, transportation and/or products.

## **4: Quality Responsibilities of Neogen Suppliers**

### **Quality**

NEOGEN suppliers will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that meet NEOGEN's needs, perform as warranted and are safe for the intended use. NEOGEN expects our suppliers to have in place quality assurance processes to identify defects and implement corrective actions and to facilitate the delivery of a product whose quality meets or exceeds contract requirements.

### **Counterfeit Parts**

Neogen expects our suppliers to develop, implement, and maintain methods and processes appropriate to their products to prevent the introduction of counterfeit parts and materials into deliverable products. Suppliers must ensure that effective processes are in place to detect counterfeit parts and materials, as applicable, and exclude them from the delivered product.

### **Product Safety Sheets and GHS Labeling**

Federal and State regulations require manufacturers and distributors of hazardous material to provide Safety Data Sheets (SDS) to customers purchasing their products. These SDS were formerly called Material Data Sheets (MSDS). Suppliers are required to provide an original SDS on each

620 Leshner Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



product Neogen purchases. Complete SDS sheets are required to be part of the accompanying documentation for new products purchased by Neogen.

All product labeling on incoming product to Neogen also must adhere to the GHS (Globally Harmonized System of Classification) labelling requirements in place.

### **Health and Safety**

Neogen suppliers shall comply with all applicable health and safety laws, regulations, and directives. Neogen Suppliers should always protect the health, safety and welfare of their people, visitors, and others who may be affected by their activities.

### **Environment and Sustainability**

Neogen suppliers must comply with all applicable environmental laws, regulations, and directives and operate as responsible stewards of the environment.

## **5: Ethical and Business Practice Expectations of Neogen Suppliers**

### **Business Integrity**

Neogen suppliers are expected to maintain the integrity of our procurement and acquisition process. Neogen suppliers may not improperly use competitor's confidential or proprietary information for their own benefit. If a supplier becomes aware of such information, they should take immediate steps to avoid its improper use and inform Neogen as appropriate.

### **Fair Competition**

Neogen suppliers must commit themselves to fair and undisturbed competition and comply with all applicable anti-trust regulations. They must omit anti-competitive agreements with competitors, suppliers, distributors, and customers as well as anti-competitive practices.

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



### **Insider Trading**

Neogen suppliers and their personnel must not use material, non-publicly disclosed information obtained during their business relationship with us as the basis for trading or enabling others to trade in the stock or securities of our company or those of any other company.

### **Conflict of Interest**

Neogen suppliers must avoid conflicts of interest of situations giving the appearance of a potential conflict of interest in their dealings with us. We require our suppliers to provide notification to affected parties if an actual or potential conflict of interest arises, including conflicts between the interest of NEOGEN and the personal interest of a suppliers' employees, their close relatives, friends or business associates of a supplier or its employees.

### **Gifts**

Neogen believes our suppliers should compete on the merits of their products and services. Suppliers are expected to not offer to Neogen employee's gifts or exchange of any business courtesies. In any business relationship, NEOGEN suppliers are expected to comply with all applicable anti-money laundering regulations.

### **Anti-Corruption Laws**

Neogen suppliers must comply with all applicable anti-corruption laws, directives, and regulations.

Neogen requires our suppliers to refrain from offering or making any improper payments of money or anything of value to Government officials, political parties, candidates for public office, or other persons.

Neogen requires our suppliers to use due diligence to prevent and detect corruption in all business arrangements.

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



### **Anti-Trust**

Neogen suppliers must not engage in anti-competitive practices in violation of applicable law, regulation, or contractual requirements.

### **Import Practices**

Neogen suppliers must ensure that their business practices are in accordance with all applicable laws, directives, and regulations regarding the import of goods and technical data. NEOGEN requires our supplier to provide truthful and accurate information and obtain appropriate licenses and/or consents where necessary.

### **Export Practices**

Neogen suppliers must ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing the export of goods and technical data. NEOGEN requires our suppliers to provide truthful and accurate information and obtain appropriate licenses and/or consents where necessary.

### **Anti-Boycott**

Neogen suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the United States 1799 Export Administration Act and the United States 1976 Tax Reform Act, or similar legislation or regulations.

### **Conflict Minerals**

Neogen suppliers must comply with any applicable laws and regulations regarding conflict minerals and assist us in meeting our obligations under law and regulation. Neogen reports annually to the United States Securities and Exchange Commission on our use of conflict minerals (tantalum, tin, tungsten, and gold) originating in the Democratic Republic of Congo (DRC) or any of the DRC's adjoining countries in products manufactured or contracted to be manufactured by the company and are required to conduct due diligence on the use of conflict minerals in our supply chain. Neogen suppliers must support

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



our efforts and conduct due diligence on the use of conflict minerals in our supply chain, including identification of products in their supply chain that contain conflict minerals and validating the country or origin of these minerals.

### **Carbon Dioxide Emission and Water Consumption Reductions**

Neogen suppliers should promote the development of technologies limiting carbon dioxide emissions and water consumption as well as energy saving and recycling solutions and should implement logistic strategies that minimize overall environmental impacts.

### **Intellectual Property**

Neogen requires our suppliers to respect and comply with all applicable laws binding obligations regarding governing intellectual property rights, including protection against:

- Disclosure
- Patents
- Copyrights
- Trademarks

### **Cybersecurity**

Neogen suppliers must take care to safeguard and protect information entrusted to them and information generated or developed by them in support of our products or services from unauthorized access, destruction, use, modification, or disclosure. NEOGEN expects our suppliers to have risk-based cybersecurity programs designed to mitigate emerging threats.

### **6: Management System Expectations of Neogen Suppliers**

Neogen suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Business Conduct. This includes the following aspects:

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com



### **Sustainability**

Neogen suppliers will communicate the principles set forth in this Supplier Code of Conduct to their Supply Chain.

### **Commitment and Accountability**

Neogen suppliers are encouraged to fulfill the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources.

### **Risk Management**

Neogen suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Business Conduct and with respect to all applicable legal requirements.

### **Continuous Improvement**

Neogen suppliers are encouraged to continuously improve their sustainability performance by implementing appropriate measures.

### **Audit**

Neogen suppliers shall provide us, upon request with the necessary and/or requested documents that provide compliance with this Supplier Code of Business Conduct. Suppliers are required to inform Neogen without undue delay if a breach of these principles occur, along with providing a corrective action plan to cure the breach as evidence to Neogen.

Suppliers of Neogen are expected to grant Neogen access and rights under the permitted applicable laws to perform audits at the Supplier's facilities.

620 Leshar Place  
Lansing, MI 48912 USA

800.234.5333  
517.372.9200

NEOGEN.com