

LGC Code of Ethics

Message from Joydeep Goswami, President & Chief Executive Officer

How we do business at LGC is just as important as the quality of the products and services we provide to our customers.

It is integral to our purpose to deliver “Science for a Safer World” and that’s why our values include both “integrity” and “respect”.

We expect all our colleagues to “do the right thing” and to seek guidance when the “right thing” is not clear.

If we see any conduct that is not aligned with our values, or with this Code of Ethics, we should challenge it or report it. No commercial or financial objective can supersede this mandate.

So, if you have any concerns, please do not hesitate to reach out to your manager, HR, or the LGC Legal Team, or use the whistleblowing channels (see page 6 for details).

We all have a personal responsibility to do the right thing and I do hope our updated Code of Ethics will help us understand why it is so important, as well as reminding us of our obligation to act lawfully and ethically at all times.





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Our values

Our values reflect our commitment to work in partnership with our customers and deliver scientific solutions to make the world safer.

They are deeply rooted in the behaviours we expect from all LGC Colleagues. We seek to ensure our conduct is aligned with our values – and all of our day-to-day activities should be undertaken with Integrity and Respect.



We are driven by our commitment to deliver excellence daily.

We continuously push boundaries, seeking creative solutions.

With a rich history, integrity is ingrained in our culture.

Our experts work together to deliver exceptional science.

We value diversity, individual contributions, and sustainability.

Our commitment to high ethical standards

The Board has adopted this LGC Code of Ethics (“Code”) and we all have a responsibility to conduct our business with the highest ethical standards.

We each have a responsibility to read this Code, to understand how it applies to what we do at LGC* and to raise any questions or concerns that we may have.

This Code sets out the principles which all LGC Colleagues* are expected to follow and supports our commitment to do business in compliance with all applicable laws and to the highest ethical standards. This Code does not summarise every applicable law, regulation or policy. However, it does set out ethical principles that should guide all our decisions and interactions with stakeholders such as: employees, customers, partners and suppliers. It also explains the consequences if we do not adhere to these principles. Failure to comply with this Code may lead to disciplinary action up to and including potential dismissal. Certain actions in breach of Code requirements could result in criminal proceedings being taken against LGC Colleagues and/or LGC.

This Code is supported by a number of policies that are in place to ensure LGC Colleagues understand the boundaries of legitimate behaviour and how we are expected to behave within those boundaries. LGC Colleagues will be asked to undertake periodic training on certain aspects of this Code.



* When we refer to “LGC” in this Code and the Policies referenced we are including LGC Science Group Holdings Limited and all its direct and indirect subsidiaries. When we refer to “LGC Colleagues” in this Code, we are including all LGC employees, directors, officers, temporary staff, agency workers, seconded workers, interns and apprentices wherever located and regardless of employment status. It also includes contractors and consultants in the performance of their duties for LGC.



Raise a concern

We each have a responsibility to raise concerns we might have about potential misconduct, illegal activity, fraud or violations of this Code.

If you have any concerns or queries, you should raise these with your manager in the first instance if this is feasible. We recognise that in some instances that may not be appropriate, so you may also ask questions or report concerns to HR or the LGC Legal Team.

Alternatively, you can report a concern anonymously by using the Whistleblowing Portal which details how you can make a report in writing or by telephone.

Our Whistleblowing Portal is operated by a third party and is not staffed by LGC Colleagues. For concerns reported via the Whistleblowing Portal, your identity will not be disclosed to LGC without your permission.

In accordance with our Whistleblowing Policy, anyone who raises a concern or query in good faith will not be subject to any retaliation or reprisal, LGC does not tolerate behaviour that seeks to retaliate against those who report actual or potential breaches of the Code.

The Ethics Committee monitors our compliance activities and the use and effectiveness of this Code, which it reports on to the Board.

If you have any questions about this Code or any suggestions for improvements or additions to its content, please contact the LGC Legal Team.

Following laws and regulations

We deliver value to society, and people in many walks of life depend upon us. The integrity and quality of our products and services is essential.

Any falsification of research or scientific information, data or product specifications will not be tolerated.

To ensure the trust people place in us is maintained, LGC Colleagues must respect and comply with all applicable laws and regulations in the countries in which LGC operates. There are certain laws and regulations that we must all comply with regardless of the country in which we operate. In other areas, such as Equality and Diversity or Data Privacy, LGC policy may require conduct or action that goes above and beyond what some national laws require.

If you are unsure of the legal requirements on a given topic or think there is a conflict between local laws and regulations, and the requirements of this Code you should discuss this with your manager or contact the LGC Legal and Compliance Team.



Fair competition

Competition and anti-trust laws around the world seek to promote free and fair competition between commercial enterprises by prohibiting activities that may have an anti-competitive effect on the market.

LGC does not tolerate actions which fail to comply with competition laws. LGC Colleagues must ensure that they do not engage in activities that may have or may be seen to have an anti-competitive effect.

Failure to comply with competition and anti-trust laws can result in individuals being liable to criminal prosecution and imprisonment and expose LGC to significant fines.

YOU MUST NOT:

- Discuss or share confidential information with competitors including pricing terms, contract terms, strategy, customer or supplier information
- Set minimum resale prices for our products
- Agree with competitors to allocate customers, limit production or to exclude/ boycott customers or suppliers
- Fix prices or collude with competitors on tenders

You can learn more on the detail of these requirements by reading our Competition(Anti-trust) Law Policy.

Any questions about competition laws should be referred to the LGC Legal Team.

Anti-bribery

LGC does not tolerate bribery or corruption in any form.

Bribery is a form of corruption which involves offering something of value (financial or otherwise) to an individual, governmental entity or enterprise for the purpose of obtaining an improper business advantage. It is not limited to the bribery of government officials.

EXAMPLES OF BRIBERY AND CORRUPTION

- Providing cash or gifts to an individual or family member
- Facilitation payments (a payment to speed up or encourage an otherwise legitimate action)
- Inflated commissions
- Hiring decision
- A favour
- Political or charitable donations and sponsorship



ZERO TOLERANCE

In certain countries, individuals found guilty of bribery may be personally fined or imprisoned. If individuals working for or on behalf of LGC are found to have participated in bribery, LGC can face unlimited fines, be excluded from tendering for public contracts and our reputation would be damaged. As such, LGC has a “zero tolerance” stance on such matters.

As well as ensuring that all LGC Colleagues follow our Anti-Bribery and Anti-Corruption Policy, LGC has an obligation to “know its partners” and to ensure that any third parties with and through whom LGC conducts business (i.e. agents, distributors, partners) are properly vetted and have the same “zero-tolerance” approach to bribery as LGC.

Gifts and hospitality

Gifts and hospitality can create improper influence and, if excessive, without legitimate business content or rationale, may be considered to be bribes.

Our Gifts and Hospitality Policy sets out the principles and processes that must be followed to ensure that gifts and hospitality are legitimate and not considered to be bribes. If you have any questions about gifts and hospitality, you should raise these with your manager or contact the LGC Legal and Compliance Team.



CHARITABLE AND POLITICAL DONATIONS AND SPONSORSHIP

All corporate charitable donations must comply with applicable laws and must not be made to influence any person directly or indirectly for any improper purpose or for any business advantage.

Unless authorised in advance by the Group General Counsel, requesting or authorising payments to a government or public official, political party, candidate or incumbent for political office is not allowed. The Group General Counsel will determine whether or not the proposed payment is permissible in accordance with LGC’s Gifts and Hospitality Policy and under applicable law.

You can learn more by reading our Anti-Bribery and Anti-Corruption Policy and Gifts and Hospitality Policy.

If you have any questions or concerns about anti-bribery and corruption laws, please speak to your manager or contact the LGC Legal and Compliance Team.

Trade sanctions

Sanctions are restrictions on trade implemented for political reasons by countries and international organisations.

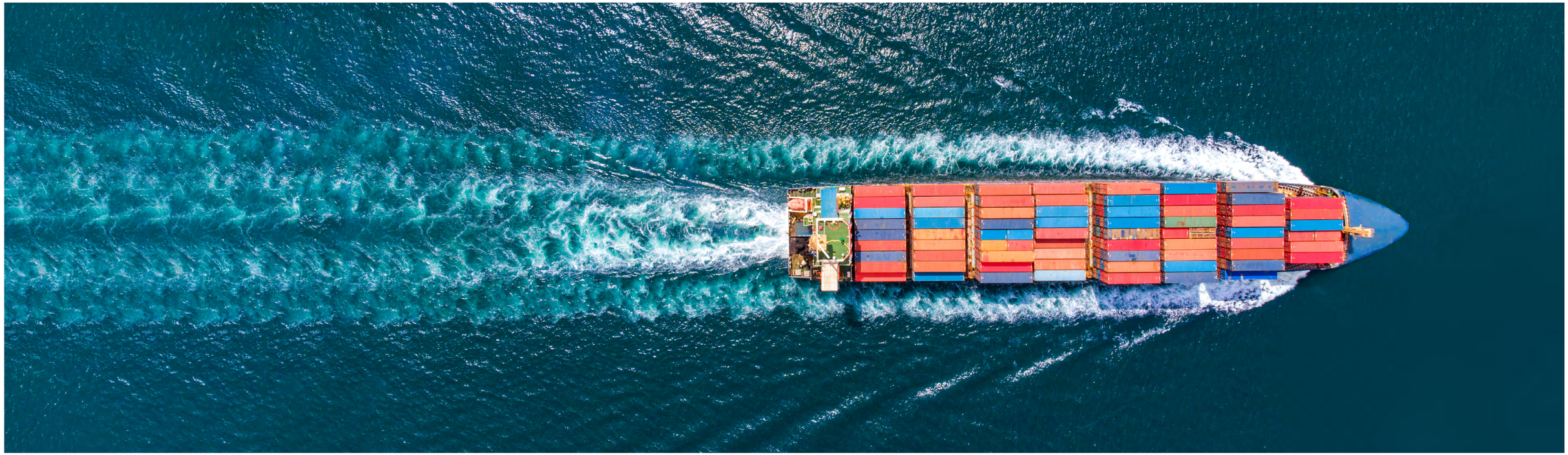
Sanctions can forbid trade in specific goods or services with particular countries or with Specially Designated Nationals (“SDNs”), who often appear on what are referred to as Denied Party Lists (“DPLs”). LGC complies with sanctions imposed by governments of countries in which LGC operates. Trading with sanctioned countries or SDNs can lead to fines or imprisonment.

That is why all sales and purchases across LGC must be checked against the current list of DPLs and SDNs.

In addition to trade sanctions, there may also be occasions when our shareholders direct that we should not trade with a country or entity on other policy grounds.

You can learn more about trade sanctions by reading the Trade Sanctions Policy.

If you have any questions about trade sanctions, you should speak to your manager or contact the LGC Legal and Compliance Team.





Handling information

LGC recognises that information is a vitally important asset - whether that is our own information, that of our customers, suppliers and business partners, or that of our employees and other individuals.

We are committed to protecting all information, ensuring that it is kept safely and used appropriately.

PERSONAL DATA

We need to handle customer, supplier and employee personal data to run our business successfully. Personal data is information by which a living person can be identified - such as contact information, date of birth or passport number. Personal data also includes genetic data and biometric data which must be handled only with appropriate safeguards in place.

All LGC Colleagues have a responsibility to ensure that customer, supplier and employee personal data is kept secure and confidential and to comply with appropriate data protection and data privacy laws.

We can do this by obtaining only as much personal data as is needed to fulfil the purpose for which it is collected, using it only for that purpose, keeping it safe and keeping it only for as long as required for the purpose.

Confidentiality

You should take appropriate precautions with confidential or sensitive business information, whether belonging to LGC or another company.

Ensure this information is not communicated except to those who have a need to know to perform their responsibilities. Unauthorised disclosure of confidential information could cause competitive harm to LGC and our business partners. Your obligation to protect confidential information may continue after you leave LGC.

Remember to lock confidential information and personal data away, keep your desk clear, lock computer screens and dispose of hard copy personal data securely.

Information security breaches involving personal data can lead to substantial fines for LGC, damage to our reputation, loss of customer trust and loss of customers.

You can learn more by reading our Data Privacy and Processing Policy.

If you have any questions about data protection, you should speak to your line manager, or contact the LGC Legal and Compliance Team.

INSIDE INFORMATION

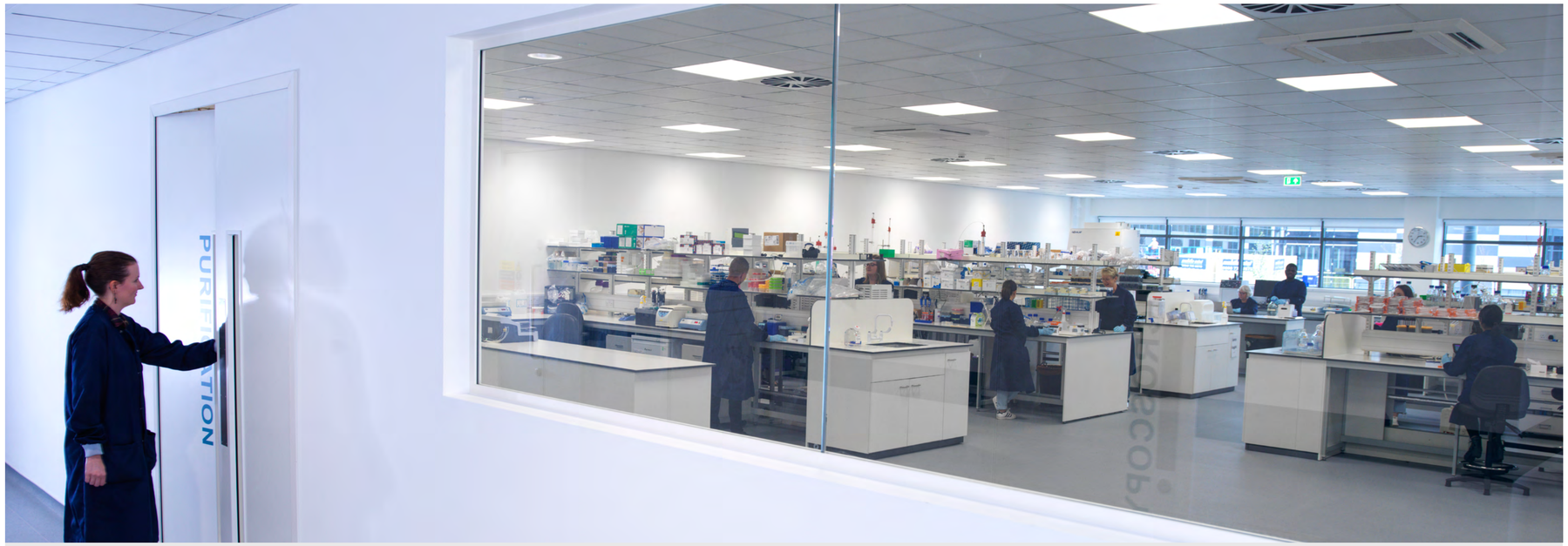
Some of us will have access to non-public information about companies that may also be material and specific enough to have a significant effect on that company's share price. This is known as "inside information". If you are in possession of inside information, you must not trade in relevant shares or other securities of such a customer or give anyone else a tip to do so.

Financial records

Accurate business records are essential to the management of LGC. All of our books, records and accounts must fully and accurately reflect our business transactions.

Any business or financial records prepared with the intent to mislead or misrepresent the business or financial position of any part of our group would be a fraud and will not be tolerated.

Matters of financial or accounting interpretation should be considered by relevant LGC Finance colleagues in consultation with our auditors, as appropriate.



Preventing fraud

We act with honesty and integrity in all our business dealings. Fraud, dishonesty or the misuse of LGC assets or resources will not be tolerated.

We all have a responsibility to help prevent, detect and report fraud. This means remaining alert to risks, making ethical decisions and speaking up if something does not seem right.

We must follow the controls and processes set out in LGC's Fraud Policy Statement.

If you become aware of any actual, attempted or suspected fraud, report it to your line manager and through the ERM Reporting Portal, or via the Whistleblowing Portal. Anyone who raises a concern in good faith will be supported and will not be subject to retaliation.

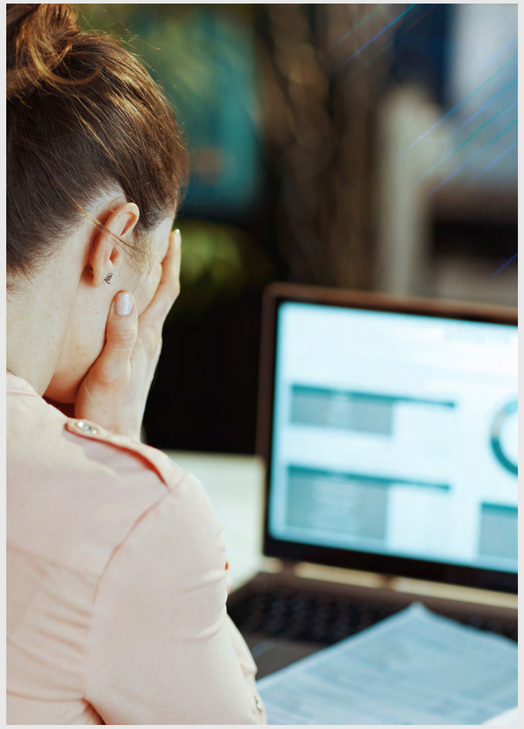
Anti-facilitation of tax evasion

LGC is committed to preventing the facilitation of tax evasion.

Tax evasion is a criminal offence in many countries. If tax evasion is found to be facilitated by LGC Colleagues, we can face unlimited fines and damage to our reputation. This is why we have a “zero-tolerance” approach to such matters.

You can learn more about what facilitating tax evasion is and how to prevent it by reading LGC’s Anti-facilitation of Tax Evasion Policy.

If you have any questions about preventing the facilitation of tax evasion, you should speak to your manager or contact the LGC Legal and Compliance Team.





Supplier management

LGC wishes to conduct business and build relationships with suppliers who share our commitment to the highest ethical standards and abide by our Supplier Code of Conduct.

Performing due diligence and responsible selection and management of our suppliers is important to how we do business.

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

WE EXPECT OUR SUPPLIERS TO:

- Act with honesty and integrity at all times in all our business dealings
- Provide a safe working environment where colleagues are treated with dignity and respect
- Seek to minimise and reduce our impact on the environment
- Provide transparency of the supply chain and improve standards throughout

If you have any concerns about our supplier management, please speak to your line manager or contact the Head of Procurement.



Treating people with respect

We place great emphasis on treating people with fairness, dignity and respect and are committed to promoting equality of opportunity for all colleagues and applicants.

We are committed to creating a working environment that is free of discrimination, harassment and bullying. Any behaviour that undermines this commitment is unacceptable.

We support each other in serving our customers and exceeding their expectations. We value and respect the contribution of every LGC Colleague and endeavour to optimise their potential.

We have policies in place to ensure that we are compliant with local employment laws. In some cases our Policy may go above and beyond what national laws require. For instance, our diversity policies prohibit all forms of discrimination based on age, disability, race, colour, ethnic or national origin, sex, sexual orientation, gender reassignment, marital or civil partner status, pregnancy, maternity, religion or belief, or any other basis protected by country, state or local regulations.

We do not tolerate any form of bullying or harassment in the workplace or in any work-related setting. We do not tolerate victimisation of a person making allegations of bullying or harassment in good faith.

If you see conduct that does not meet the standards set out here, it should be reported to your manager, HR and/or the Legal and Compliance Team.

Conflicts of interest

You are always expected to act in the best interests of LGC. When competing interests impair your ability to make objective, unbiased business decisions, you have a conflict of interest.

Even if you do not benefit directly from any particular action or decision in circumstances in which you may have an interest, a conflict can still occur if it appears to others that you may have influenced an action or decision.

The perception of competing interests, impaired judgment or undue influence can also be a conflict of interest. A conflict of interest may be financial in nature (for instance, when taking a particular action could result in a financial benefit to you) or non-financial (such as managing a close relative or partner or managing a business account with your former employer).

YOU ARE EXPECTED TO:

- Maintain the highest possible standard of integrity in all your business relationships
- Reject any business practice that might reasonably be considered improper
- Never use your authority or position at LGC for personal gain (save for when interests have been specifically aligned with LGC's, for instance a sales target established to motivate sales and marketing colleagues)
- Act with impartiality, independence and integrity at all times
- Avoid being, or giving the appearance of being, in a position that may result in actual or perceived harm to LGC's reputation and/or interests



You must disclose potential conflicts in a timely manner and seek direction from your line manager and/or the Legal and Compliance Team on any issues which may potentially conflict with your responsibilities to LGC. Further guidance is provided in our Conflicts of Interest Policy.

Personal conduct and social media

You should always be mindful of your responsibility to comply with this Code in public settings, including online and in web-based forums or networking sites. You are encouraged to be responsible, respectful, and honest at all times, including on social media platforms. You are prohibited from using or disclosing confidential, proprietary, or commercially sensitive LGC information on our social media platforms. Harassment of others through social media platforms will not be tolerated.

Further guidance can be found in our Social Media Policy.





Your responsibility and where to get help

We each have a responsibility to read and understand this Code and to make decisions and behave in a way that reflects LGC's commitment to the highest ethical standards.

If you have any concerns or queries, you should raise these with your manager.

If this is not appropriate, you should report your concerns to HR and/or the LGC Legal Team.

Alternatively, you can report a concern anonymously by using the LGC Whistleblowing Portal.

FURTHER GUIDANCE:

Contact the Legal and Compliance Team via **legal@lgcgroup.com**

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