

# Modern Slavery and Human Trafficking Statement

#### Introduction from the Board of Directors

This is our first modern slavery and human trafficking statement prepared in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act").

It continues to be a priority for Benchling Inc. to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement describes the actions taken by the Benchling Group and its subsidiaries during the year ending 2023, including the following United Kingdom (UK) subsidiaries that are governed by the Act:

- Benchling UK Limited; and
- Overwatch Research Limited.

Benchling Inc and its subsidiaries (the "Company", "Benchling", "us" or "we") are committed to upholding the highest standards, and ensuring that we comply with the relevant laws and regulations (including the Act). We are also committed to ensuring transparency in how we conduct our business, and the prevention of modern slavery in our supply chain.

Modern slavery is a crime and a violation of fundamental human rights. Benchling has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

#### **About Us**

We are a provider of cloud-based software in the Information Technology and Biology sectors. We include a number of subsidiaries, with the company headquartered in San Francisco, California. Benchling has over 800 employees worldwide and has operations in 4 countries.

All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave their employment with Benchling. Employees are free to serve notice at any time.

Benchling carries out verification of an employee's identity and ongoing right to work in the UK and does not seek to withhold any of an employee's identity documents or passport etc.

Benchling pays all its employees at least the national minimum wage and adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.



#### **Our business**

Our business is designed to unlock the power of biotechnology. We have a number of different teams focused on this goal including Engineering, Security, Sales, and General and Administrative. The entire focus of the business is to provide world leading services to our thousands of customers.

### Our supply chains

As a software company that primarily utilizes software and services to build our product and provide our own service we do not have a traditional supply chain. However, we ensure that all our providers and suppliers retain a commitment to relevant regulations and legislation. During the onboarding process we assess our potential supplier from a number of perspectives, including legal, compliance, human resources and security. This is designed to ensure that our suppliers all maintain the highest standards in the way that they do business.

### Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies,

Our modern slavery and human trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

# Due diligence processes for slavery and human trafficking

We understand that subcontractors and / or suppliers who operate in markets with less rigorous regulations with regard to human rights gives rise to the highest modern slavery risks. We vet suppliers and sub-contractors to ensure that they are committed to ethical labour practices. We only employ agency workers through reputable employment agencies that adhere to our anti-slavery and human trafficking policy (or equivalent policies).

We are in the process of ensuring that compliance with appropriate labour practices is an ongoing requirement of doing business with us.

We also have in place systems to:

- · Identify and assess potential risk areas in our supply chains.
- · Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains
- Protect whistle blowers .

#### Supplier adherence to our values

We have zero-tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

We have a dedicated compliance team, which ensures that any of our suppliers adhere to our standards.

With respect to the conduct of our suppliers, we expect our suppliers to comply with applicable laws, including the Act. Should Benchling become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our compliance team to ensure that



appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with the supplier.

### **Training**

We ensure that all new joiners to the company are made aware of the Act as part of their induction and a copy of this policy is included in the Company Handbook. To make colleagues aware of the Act, we share this statement with all colleagues through our internal communication channels and a copy of this statement is available on the Benchling website

## **KPIs and Next Steps**

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

With this in mind we have set the following aims:

## 1. Training and awareness within our business

Our management team will provide training on human rights and anti-modern slavery to our staff and we plan to set annual refresher training for staff going forward. Training will include what modern slavery is and indicators to look for, as well as details our expected standards of our staff.

### 2. Evolving and expanding Benchling's supplier assessment processes

We intend to implement a supplier questionnaire as part of its onboarding process for suppliers. The suppliers targeted will consist of those from the high-risk categories identified in this Statement as well as those with high spend.

This statement is made pursuant to section 54(1) of the Act and constitutes our slavery and human trafficking statement.

For and on behalf of Benchling UK Limited

Julie Hwang

Julie Hwang, Director

Date: 22 January 2024