



TWIST BIOSCIENCE CORPORATION

SUPPLIER CODE OF CONDUCT

Introduction

We are a rapidly growing life sciences company that has developed a disruptive DNA synthesis platform to industrialize the engineering of biology. The core of our platform is a proprietary technology that pioneers a new method of manufacturing synthetic DNA by “writing” DNA on a silicon chip. We are headquartered in South San Francisco, California, with offices in Portland, Carlsbad, Boston, Tel Aviv, Singapore, and China.

This Twist Bioscience Supplier Code of Conduct (“Code”) is the foundation for ensuring responsibility and ethical conduct throughout our supply chain. The principles outlined below serve as the cornerstone of Twist’s relationship with our partners. Twist will identify and engage in business with organizations that conduct their business according to principles that are consistent with the Code. We encourage supplier partners to develop policies defining the operating principles for their own organizations and supply chains and to share these in a transparent manner.

Our Business and Supply Chains

We have applied our unique technology to manufacture a broad range of synthetic DNA, RNA and protein-based products, including synthetic genes, tools for next generation sample preparation, and antibody libraries for drug discovery and development, all designed to enable our customers to conduct research and produce products more efficiently and effectively. We sell our products to a global customer base that includes thousands of customers across a broad range of industries.

Our supply chain includes distributors and manufacturers of materials in the following life science industry categories: chemical reagents, labware, packaging, life science automation equipment, IT equipment/software, contract manufacturing, among others. Twist also procures a wide range of services, such as consulting expertise, marketing services, transportation, facilities and construction, among others. Suppliers shall maintain accurate and up-to-date recordkeeping indicating their compliance with this Code and all applicable laws and regulations.

All Twist suppliers must conduct their employment practices in full compliance with all applicable laws and regulations and in compliance with Twist requirements, as outlined in this Supplier Code of Conduct which may exceed local legal requirements. In all cases in which Twist requirements are more stringent than local legal requirements, suppliers are required to meet the more stringent Twist requirements. Twist, along with our partners and independent third parties, will conduct audits to observe these principles in action. If there is a reasonable basis to believe a supplier partner is in violation of the Code, Twist will request that the violation is corrected in a satisfactory manner, and if not rectified in a defined period of time, may transition away from that relationship.

Applicability

This Supplier Code of Conduct applies to individuals, organizations, and companies, as well as their respective agents and subcontractors, who provide or intend to provide services to or on behalf of Twist Bioscience.

Human Rights and Labor

Everyone deserves to be treated with dignity and respect. Twist is an equal opportunity employer, and we expect all our suppliers to be as well. Suppliers who engage in commercial agreements with Twist Bioscience are expected to implement equal opportunity employment, as well as diversity, equity and inclusion practices.

Twist Bioscience values diversity and inclusion in our workforce and also in our suppliers.

Forced Labor and Human Trafficking

Forced, prison, bonded, indentured, or slave labor and all forms of human trafficking are prohibited as they take advantage of people who are not in a position to consent to their actions. Withholding of, or destruction of, employee identity or immigration documents, passports or work permits are prohibited.

Child Labor

Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development, as defined by the International Labor Organization, is inconsistent with Twist's values. Suppliers shall employ and use only workers who are at least the age of 15, have reached the age of completion of compulsory education, or meet the legal minimum age for employment, whichever is highest.

Working Hours

Suppliers shall not require workers to work more than the regular and overtime hours allowed by the law of the country and/or state / province where the workers are employed or perform work.

Wages and Benefits

Compensation paid to workers should comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Punitive deductions from wages as a disciplinary measure are prohibited.

Freedom of Association and Collective Bargaining

Suppliers must respect and uphold the right of workers to choose whether to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively. Suppliers shall refrain from any form of interference, discrimination, reprisal, intimidation, or harassment against workers exercising these rights. Furthermore, suppliers must establish and communicate an effective and accessible grievance mechanism that allows workers to openly communicate concerns regarding working conditions and management practices without fear of adverse action.

Employee Development and Training

Suppliers shall implement and maintain comprehensive employee development, including onboarding, ongoing training, leadership development courses, and clearly define career progression opportunities.

Suppliers must ensure equitable access to all available training programs for all employees, regardless of department or location. Twist expects suppliers to monitor training participation and outcomes, establish measurable goals for employee development, and demonstrate how training achievements are linked to employee career progression, hereby fostering continuous learning and growth within their organization.

1. Health and Safety

Twist expects its suppliers to adopt and maintain Health and Safety Management Systems to limit exposure to occupational hazards, prevent emergencies, safeguard machines, manage physically demanding work, and provide access to clean and safe working environment and facilities. Suppliers shall comply with all applicable laws related to maintaining a healthy and safe working environment.

Environment

Twist and its suppliers must work to avoid any harm to the environment in all our activities. Twist suppliers are expected to adopt and maintain Environmental Management Systems to ensure compliance with all applicable environmental laws and regulations. Following principles of continuous improvement, partners shall take a proactive approach to reducing environmental and resource impacts in all areas of their business. This includes management of all waste, discharges, and emissions, and lead to more efficient use of water and energy resources.

Customer Well-being

Where applicable, suppliers must ensure all products and services are safe for use. This may include rigorous testing, risk assessment, clear labeling, and transparent information. Suppliers must meet all applicable safety standards and use commercial efforts to mitigate risks to consumers and their own personnel.

2. Business Practices and Ethics

Suppliers are expected to act in accordance with the values and principles enshrined in the Twist Bioscience Corporation [Code of Business Conduct and Ethics](#) on topics including, but not limited to: company records, communication, conflicts of interest, compliance with laws, rules, and regulations, insider trading, protection of confidential and proprietary information, and fair dealing.

3. Legal and Regulatory Compliance

All Twist suppliers are expected to comply with the applicable laws, regulations, and rules in all countries to which they travel, in which they operate, and where they otherwise do business. Suppliers should have compliance programs designed to ensure that their business activities with and/or on behalf of Twist are conducted in full compliance with all applicable laws and regulations, and must, without limitation, meet the following requirements:

Trade: Comply with all international and local rules, regulations, and controls on any technology transfers (physical and electronic), exports, re-exports, and imports, as well as country sanctions and denied parties list screening imposed by the applicable governmental entity.

Antitrust: Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.

Boycotts: Not participate in international boycotts that are not sanctioned by the United States (U.S.) government or applicable laws or take any action that has the effect of furthering or supporting a restrictive trade practice imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

Anti-Corruption: Conduct business in full compliance with the U.S. Foreign Corrupt Practices Act (“FCPA”), which prohibits directly or indirectly giving or offering anything of value to a government official to obtain or retain business or favorable treatment, and requires the maintenance of accurate books of account, with all supplier transactions being properly recorded.

4. Sustainable Procurement

Twist suppliers are expected to engage in sustainable procurement to achieve the appropriate balance between financial, environmental and social considerations when procuring goods, services or works at all stages of the value- transformation cycle, while considering their costs through the entire life cycle. Such considerations pertain, for instance, to the respect of core labor and safety standards in the production process, and the energy efficiency performance and innovative characteristics of purchased and/or provided products.

5. Environmental Responsibility

Environmental responsibility and sustainability are priorities for Twist.

Compliance with Environmental Laws: Supplier agrees to operate in accordance with a recognized Environmental Management System (EMS).

Sustainability & Climate Action: Supplier agrees to implement an environmental footprint reduction program or practices wherever possible.

Conflict Minerals: Supplier agrees not to utilize conflict minerals in manufacturing its products.

Waste Management: Supplier agrees to preserve natural resources, such as energy, water, forests, etc., and prevent the exploitation of such natural resources.

6. Non-compliance Reporting

Suppliers and their personnel may report any violations of, or activity inconsistent, with this Supplier Code of Conduct through any of the following methods:

Web: www.whistleblowerservices.com/TWST

Phone: Twist Whistleblower Hotline at: 866-203-1642

Mail:

Twist Bioscience Corporation
681 Gateway Blvd
South San Francisco, CA 94080
Attn: Legal Department